



Privacy Policy of the Travel Agency Mountains Group d.o.o.

The travel agency Mountains Group d.o.o. (hereinafter referred to as the "Agency") takes the protection of your personal data seriously and takes all necessary measures in accordance with professional practices and obligations prescribed by the Personal Data Protection Act, the General Data Protection Regulation (EC 2016/679) – GDPR, and other applicable regulations.

The purpose of this Policy is to provide all parties with the necessary information regarding the processing and protection of personal data, as well as the rights that data subjects have in relation to the processing of their personal data. This Policy applies to all personal data of clients processed by the Agency and data processed by the Agency's partners on behalf and for the purposes of the Agency.

1. Key Information

Data Controller:

Mountains Group d.o.o.
Zagrebačka avenija 104, 10 000 Zagreb
VAT ID: 73924493303

Contact for Inquiries:

info@mountainsgroup.hr

2. Purpose of Personal Data Processing

The Agency, as the data controller, protects your privacy and processes only the personal data that is necessary and has been obtained in the course of its business activities, whether the data was obtained from you, third parties, or publicly available sources, for the following purposes:

Execution of contractual obligations – when processing is necessary for the performance of a contract to which you are a party or for taking steps at your request before entering into a contract.

Satisfaction of legitimate interests – if necessary, we process personal data outside the specific contractual relationship to protect our legitimate interests, such as: conducting legal proceedings and maintaining records of them; identifying perpetrators of criminal offenses and preventing fraud; protecting individuals and property, etc.

Fulfilling your requests – to help us develop, deliver, and improve our products and services, or for our internal purposes such as audits, data analysis, and research to enhance our products, services, and communication with customers.

Responding to your inquiries and comments.

Compliance with legal obligations – processing is necessary for compliance with legal obligations to which the Agency is subject.

If we need to process your personal data for purposes not described here or outside the purposes for which you provided consent, we will provide you with information regarding the new purpose and any other relevant information before such processing takes place.

3. Principles of Personal Data Processing

Lawful, Fair, and Transparent Processing

We process data in compliance with applicable laws governing the processing of personal data and in accordance with the best business practices for data protection. The principle of transparency is reflected in the fact that we inform interested clients about how their personal data is collected, used, disclosed, or otherwise processed, as well as to what extent the personal data is or will be processed. According to the principle of transparency, every piece of information and communication regarding the processing of personal data

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should be easily accessible and understandable, and it should be presented in clear and simple language that is understandable to the end user. This principle particularly applies to informing the client about the identity of the data controller, the purposes of the processing, and further information to ensure fairness and transparency in the processing with respect to individuals, as well as their right to receive confirmation and notification about the personal data being processed, which relates to the client.

We process personal data with respect for security and confidentiality, which includes preventing unauthorized access to personal data and the equipment used in the processing of the data or its unauthorized use.

Processing in Line with the Purpose for Which the Data Was Collected

We process the collected data only in line with the purpose for which it was gathered. Personal data is collected to improve the quality of content, functionality, and service offerings, in order to meet your desires and needs, and to inform you about existing and new content and services offered by the Agency that may be of interest to you. Access to the website is free, and registration is not necessary.

Data Minimization

We collect and process only the data that is necessary to achieve the purpose of processing.

Limiting the Duration of Data Processing and Retention

We process and store data only as long as necessary to fulfill the purpose for which the data was collected or as required by applicable laws.

Certain personal data is kept for the period prescribed by law or regulations that obligate us to retain the data. If we process data based on the consent of the data subject, we will retain the data until the data subject withdraws their consent. You may withdraw your consent at any time by sending a request:

to the email address: info@mountainsgroup.hr

addressed to: **Data Protection Officer**

The retention periods for the data depend on the interest of our clients in being contacted using the contact details, which are also personal data of the data subject.

Data Accuracy

We pay special attention to the accuracy of the collected data. You have the right to access your data and correct it at any time.

We take all necessary steps to ensure that inaccurate personal data is corrected or deleted without delay.

4. CLIENT RIGHTS

In accordance with the General Data Protection Regulation (GDPR), the client has the following rights:

Right to Access Data

The client has the right to obtain confirmation of whether or not their personal data is being processed, and if it is, they have the right to access their personal data and the following information: the purpose of processing, the categories of personal data being processed, the recipients or categories of recipients of the data, the retention period for the data or the criteria used to determine that period, the right to request rectification, erasure, or restriction of processing, the right to object to such processing, the right to lodge a complaint with the supervisory authority, information about the source of the data if it was not obtained from the data subject, information about automated decision-making systems including profiling, and the protective measures if the data is transferred to a third country.

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The Agency ensures the provision of a copy of the personal data being processed. If the client submits a request electronically, and unless the client requests otherwise, the information will be provided in a commonly used electronic format.

Right to Rectification

The client has the right to request the correction of inaccurate data concerning them.

Taking into account the purpose of processing, the client has the right to supplement incomplete personal data, and the Agency is required to act on their request without undue delay.

Right to Erasure

The client has the right to request the deletion of personal data that concerns them, if one of the following conditions is met:

The personal data is no longer necessary for the purposes for which it was collected or otherwise processed.

The client has withdrawn their consent on which the processing is based and there is no other legal basis for processing.

The client has objected to the processing, especially if the client is a minor.

The personal data has been unlawfully processed.

The client also has the right to obtain a restriction of processing if one of the following applies:

The client disputes the accuracy of the personal data, for a period enabling the data controller to verify the accuracy of the personal data.

The processing is unlawful, and the client opposes the deletion of personal data and instead requests the restriction of its use.

The data controller no longer needs the personal data for processing, but the client requests it for the establishment, exercise, or defense of legal claims.

The client has objected to the processing, awaiting verification of whether the legitimate grounds of the controller override the client's grounds.

Right to Data Portability

The client has the right to receive the personal data they have provided to us in a structured, commonly used, and machine-readable format and to transmit it to another data controller without hindrance from the Agency.

Right to Object

The client has the right to object to the processing of their personal data at any time if the processing is based on legitimate interests of the Agency or if the processing is for direct marketing purposes. If you believe the Agency has no legal grounds for processing your personal data, you can object to the Data Protection Officer or the national supervisory authority, i.e., the Personal Data Protection Agency (AZOP). In such cases, we will no longer process your personal data, nor will we be able to provide our services or continue the business relationship with you.

Automated Decision-Making, Including Profiling

The client has the right not to be subject to decisions based solely on automated processing, including profiling.

5. METHOD OF COLLECTING PERSONAL DATA

We collect personal data through our website via the contact form and cookies, as well as via email or through service contracts and consents as mandatory parts of the travel agreement. Primarily, we process the personal data that we collect during the business relationship, such as name, surname, address, email address, mobile number, and so on.

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By signing the Travel Agreement, you are deemed to have given consent for the processing of personal data for the purpose of entering into and fulfilling the Agreement, and for communication as well as conducting the basic commercial activities related to the travel provided by the organizer. By accepting the General Terms and Conditions, you simultaneously give consent to the Agency for the transfer of personal data to third parties for the purpose of performing the travel service, and you consent that your personal data may be used for the following purposes: direct sales, market research, business analysis, customer segmentation, statistical processing, and notifications regarding the Agency's and its business partners' offerings.

If you do not wish to give such consent, you must express this when registering for the trip. You are not obligated to provide your personal data; however, please be aware that if you refuse to provide the requested data, the Agency will not be able to conclude a contractual relationship with you or fulfill its legal and contractual obligations.

Client's Consent

Client consent means any voluntary, specific, informed, and unambiguous indication of the data subject's wishes, by which they express their consent for the processing of personal data concerning them, either by a statement or a clear affirmative action. Without the consent of the data subject, we will never use personal data for any purpose for which consent is required according to applicable regulations.

The data subject has the right to withdraw consent at any time by sending a request to:

Email address: info@mountainsgroup.hr

Addressed to: Data Protection Officer

Such withdrawal will not affect the lawfulness of processing based on consent before its withdrawal. For all inquiries, the data subject should contact the Agency's contact details.

6. TYPES OF PERSONAL DATA WE COLLECT

We collect personal data based on the legal grounds previously mentioned. The data we collect includes, for example, name and surname, date of birth, phone number, email address for contact purposes, residential address, gender, nationality, passport number or other relevant personal documents when required for fulfilling legal obligations (e.g., when crossing borders).

Due to the nature of tourism services, there may be a need to process special categories of personal data that reveal, for example, religious or philosophical beliefs, and data related to the health of the data subject. This is done strictly for the purpose of fulfilling the Agreement between the Agency and the client or performing actions that precede the conclusion of the Agreement. It will be considered that the client who has provided the Agency with data from a special category of personal data has explicitly consented to the processing of such data.

We may process special categories of personal data when:

Processing is necessary for the performance of obligations and the exercise of special rights of the data controller or the client in the field of labor law and social security and protection to the extent authorized.

Processing is necessary to protect the vital interests of the client or a third party if the data subject physically or legally cannot provide consent.

Processing concerns personal data which the client has manifestly made public.

Processing is necessary for the establishment, exercise, or defense of legal claims or whenever courts act in their judicial capacity.

Processing is necessary for reasons of substantial public interest based on EU or national law, which is proportionate to the objective pursued and respects the essence of the right to data protection, providing suitable and specific measures to protect the fundamental rights and interests of the client.

Processing is necessary for reasons of public interest in the area of public health, such as protection against serious cross-border health threats or ensuring high standards of quality and safety in healthcare, medicines, and medical devices, based on EU or national law which

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provides suitable and specific measures to protect the rights and freedoms of the client, especially the confidentiality of professional secrets.

7. STORAGE OF PERSONAL DATA

We will process the collected data only for as long as necessary for the above-mentioned purposes or until you withdraw your consent. If legal, administrative, or judicial procedures are initiated, personal data may be stored until the completion of such procedures, including any period for filing legal remedies. Certain personal data will be stored for the time period prescribed by law.

8. DATA TRANSFER

We will transfer the client's data to third parties in the following cases:

For the purpose of executing the Agreement or preparing for the execution of the Agreement with the client – when necessary to provide the contracted service or requested information (e.g., employees of accommodation facilities, airline staff, tourist guides, tour leaders, embassy or consulate employees in the case of visa issuance, insurance company employees, etc.).

When the client has given consent – if necessary for the purpose for which the data subject has given explicit consent.

When engaging subcontractors as data processors for performing certain tasks.

There is a possibility of keeping records of passengers both in the home country and abroad, all for the purpose of realizing the trip itself. The only way personal data of the passengers will be disclosed is in the case of a court order or prevention of a criminal act by a competent state authority.

The Agency reserves the right to use your data (email) for its own promotional purposes (sending new programs, etc.) until you inform us in writing (via email) that you no longer wish to receive promotional offers by email.

9. DATA PROTECTION

To ensure the protection of personal data of our clients, we use the best business practices in tourism and information-communication technologies. Only authorized personnel, who understand the need for data protection and security and are subject to confidentiality obligations, have access to the data. Personal data will never be sold or unlawfully disclosed to third parties.

Our website contains links to other websites of our partners and advertisers. Privacy protection and personal data policies on those sites may differ from ours. If you access those sites, please familiarize yourself with the privacy policies they apply before providing personal data, as this Privacy Policy applies only to the Agency's website. The Agency is not responsible for the content, products, services, or practices of other companies. The links do not represent sponsorship or affiliation with those companies.

We or our service providers, in some special cases, may transfer your personal data outside the European Economic Area to the United States, using the prescribed security measures through the Privacy Shield Agreement.

The Agency takes all available measures to prevent unauthorized access to your personal data but cannot guarantee that some data will not be disclosed accidentally. To the maximum extent permitted by law, the Agency excludes liability for any damage caused to users or third parties. All unauthorized attempts to alter data on the Agency's website are strictly prohibited.

10. CONTACT

If you suspect a violation of your personal data or wish to exercise your rights under the General Data Protection Regulation, you can contact us at the following address:

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If you believe your rights have been violated, you have the right to file a complaint with the Personal Data Protection Agency.

By using the Agency's website, you grant us the right to obtain and use your personal data as outlined here. If we make changes to the privacy terms, we will post these changes on this page, so you will always have access to the way we use your entrusted data.

If you find that any links on the site lead to third-party websites with inappropriate content or unfavorable privacy protection policies, please contact us so we can remove such links. If you disagree with the Agency's Privacy Policy, please do not use our website or provide your personal data.

11. AMENDMENTS, SUPPLEMENTS, AND TRANSITIONAL PROVISIONS OF THE POLICY

This Policy comes into effect and applies from the date of publication and is available on the website. Clients will be timely informed about any amendments or supplements to this Policy, including via publication on the website. The right to data portability, deletion, and restriction of the processing of personal data is granted to the data subject at the latest from the commencement of the General Data Protection Regulation.

In Zagreb, 20.10.2025.