

Package Travel Bundling Policy

Owner: Operations / Compliance — LIMITLESS SKY & SEA LLC **Scope:** Any quote, proposal or booking targeting customers in the EEA, Switzerland, the UK or Monaco.

1. Why this matters

Directive (EU) 2015/2302 ("Package Travel Directive", "PTD") imposes organiser-grade obligations — including a **mandatory insolvency-protection guarantee** — on any trader who, vis-à-vis the same traveller and the same trip, combines a passenger-transport service with at least one other "travel service" (accommodation, vehicle rental, or an essential tourist service worth 25% or more of the package). Recital 22 makes self-designation irrelevant: a broker can be re-classified as an organiser by reason of conduct alone.

A pure, stand-alone charter sale escapes the PTD entirely (Recital 15). Our policy is therefore to ring-fence the charter from any other service we offer, unless we have deliberately taken on organiser status.

2. Default rule

The default deliverable from Limitless Sky to a EEA / CH / UK / MC customer is a **stand-alone single-entity charter**. Hotel, yacht, ground transport and concierge requests are referred to independent third-party suppliers with whom the customer contracts directly. Limitless Sky does not invoice these services, does not present them under a single total price, and does not market them as "all-inclusive", "combined deal" or "package".

3. Linked Travel Arrangement (LTA) avoidance

To avoid inadvertently creating an LTA under Art. 3(5) PTD when a customer books a hotel through a partner referred from our site or from a booking confirmation, the following safeguards apply:

- Partner links open in a new tab and are clearly identified as third-party offers.
- We never share customer payment data with the partner for the purpose of facilitating the second booking.
- We do not present a combined price.
- Tracking pixels that would otherwise establish "targeted manner" data sharing within 24 hours of the first booking are disabled for EEA customers.

4. Deliberate organiser bookings

Where the customer specifically asks for an organised package and our commercial answer is yes, we contract on the **Limitless Sky Organiser Addendum** (separate template), which:

- 1 Identifies us as organiser within the meaning of the national PTD transposition (BGB §651a / Code du tourisme L.211-1 / Codice del Turismo / Pauschalreisegesetz).
- 2 Attaches the mandatory pre-contract standard information form (PTD Annex I).
- 3 Discloses the insolvency-protection mechanism we have put in place for the booking (bond, trust account or guarantee fund) — accessible to the customer where the customer is located.
- 4 Triggers the cancellation, performance liability and refund regime of the PTD.
- 5 For French residents, evidences the financial guarantee required of non-EEA traders directing activity at France (Code du tourisme).

Organiser bookings require Compliance Officer sign-off before quotation.

5. Marketing review

The marketing team reviews website, newsletter, social and proposal templates quarterly for language that could re-classify us as an organiser (e.g., "weekend package", "all-in", "from arrival to departure we take care of everything"). Findings are remediated within 30 days.

6. Country specifics

- **Germany:** BGB §651b — substance over form; Reiseveranstalter vs Reisevermittler turns on economic risk and single-price presentation.
- **France:** Code du tourisme — non-EEA traders directing activity at France must maintain an insolvency guarantee even without Atout France registration.
- **UK:** ATOL Reg. 16 whole-plane private chartering exemption applies to pure charter; bundling can trigger ATOL — confirm with CAA-savvy counsel.
- **Switzerland and Monaco:** national equivalents exist; the same ring-fencing logic applies.

7. Contact

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