



OUR PRIVACY POLICY

OUR DATA PROTECTION COMMITMENT

Here at Adventurous Ewe we understand the concerns about how data may be stored, sent and used by companies. We are committed to complying with all data protection laws and want you to feel confident in the measures we are taking to uphold your data privacy rights.

This privacy policy explains how we, Adventurous Ewe, collect and use your personal information. In it we explain the types of information we collect, how we collect it, what we use it for and who we may share your personal information with. We also let you know what rights you have over your information.

HOW TO NAVIGATE THIS DOCUMENT

Privacy policies don't need to be confusing and we don't think you should have to read through lots of complicated paragraphs to understand how we handle your data. For this reason we have created our '*Privacy Policy Quick Guide*'.

We think this document highlights the most important points to be aware of. However, if you want more details, please see the information below.

WHAT INFORMATION MIGHT WE COLLECT ABOUT YOU?

We do our best to keep the information we collect about you to the minimum necessary. The information we collect depends upon how you are interacting with us. For example, if you're booking an expedition or event with us we are likely to ask for more information than if you're only subscribing to our newsletter or browsing our website. We may collect, use, store and transfer different kinds of personal information about you, which we have summarised below:

Details about you: Your first and last name, marital status, title, gender, e-mail address, telephone number, date of birth, loyalty membership details, your reasons for travel, meal and other travel preferences, dietary requirements, allergies and next of kin details.

Payment details: Your bank details and payment card details when making a booking with us. Details about payments to and from you and other details of products and services you have purchased from us.

Identification documents: If you are travelling on a route requiring advance passenger information, your passport or identity card details including your passport number, the country in which your passport was issued and the expiry date.

Details about your booking with us: Details such as where you are flying from and to, your booking information (including anyone else on the booking), any onward travel details if relevant, details of experiences or excursions booked through us, baggage requirements, upgrade information, lounge visits, seat preferences, meal preferences or requirements, details of

any special assistances required and any other relevant information so that we can provide you with the travel or other service you have arranged with us.

Details from your interactions with us: Information about interactions or conversations with us and our staff, including when you make enquiries, comments, complaints or submit feedback to us. This could also include username and password and your interests, marketing preferences and survey responses.

Your use of our systems and services: This includes how you use our site, telephone calls and/or social media pages, IP addresses and information you may post on social media.

Job applications: If you apply for a job with us, your CV, work history, educational details and the role you are applying for.

Special types of data: In some circumstances we may need to collect information from you that is deemed sensitive. For example, we might collect:

Data about your health: Knowing your dietary requirements, any medical conditions and any allergies you have will ensure that the trip is suitable for you and any necessary adjustments are made.

Information about your religion: For example if you specify a meal preference that indicates a particular religion, such as a kosher or halal meal.

We try to limit any sensitive personal data we collect to the minimum possible. Unless we have a specific lawful reason to use this information, we will ask for your consent to collect it.

HOW DO WE COLLECT YOUR INFORMATION AND WHY?

Depending upon your interactions with us, we might collect information in the following ways:

Direct Interactions: You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone and email or otherwise. This includes personal data you provided when you:

- book or search for an expedition or event via our websites, e-mail or telephone;
- fill in part of the booking information on our site but do not complete the booking;
- sign up to receive email updates, participate in any of our competitions, promotions (for example via any social media channels, email or our site), surveys or market research;
- create an account on our website and enter information onto online forms;
- provide us with information about an accident, illness or incident that occurred or some other feedback;
- apply for a job with us by email or via the site;
- contact us via our telephone lines, social media, post, email or instant messenger. Our interactions with you may be recorded and monitored for the purposes of improving customer service, quality assurance, training, security and general business purposes; or
- attend any of our events.

Automated technologies or interactions

- As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our *Cookie Policy* for further details.

Third parties or publicly available sources

We may receive personal data about you from various third parties as set out below:

- a. Bookings made through third party providers of whom Adventurous Ewe are the expedition or event supplier or provider

- b. Bookings made charity or corporate organisations
- c. Airlines, hotel providers or other parties we work with if you make a complaint to them;
- d. Analytics providers

WHAT DO WE USE YOUR INFORMATION FOR?

Under data protection laws we are allowed to use personal information only if we have a proper reason to do so such as:

- to fulfil a contract we have with you or;
- when it is our legal duty or;
- when it is in our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interested or
- when you consent to it

Generally we do not rely upon consent as a legal basis for processing your personal data other than in relation to sending our own or third party direct marketing communications to you via e-mail or text message. You have the right to withdraw consent to marketing at any time by contacting us.

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

To manage your booking with us: We will use your information to provide you with any travel or event services that you request or purchase. This entails booking your flights, accommodations, organising tours, transportation and car hire and providing you with your tickets (on the basis of performing our contract with you) and providing you with any special assistance you require (where you give us your consent).

To contact you with information about your bookings and support services: We will use your contact details to send you communications which relate to your booking or services you have requested. The types of information usually included would be: e-mails responding to enquiries, providing you with tickets, alerting you to changes in itineraries or responding to any complaints you have. We do these things in order to fulfil our contract with you and on the basis of our legitimate business interest of providing you with customer service.

To provide assistance with online bookings: We may collect information when you enter it into forms on our websites but do not complete your booking. We do so in order to offer assistance in case you are experiencing difficulties using our websites.

To enable you to partake in a prize draw, competition or complete a survey: We do this to perform our contract with you or for our legitimate events of studying how customers use our services, develop them and grow our business.

To send you marketing communications: We will use your information to contact you in order to keep you up to date with the latest news, offers, events, sales, promotions and competitions that we consider may be of interest or relevant to you. We will usually only do this when we have your consent to do so or on the basis of our legitimate interest to provide you with customer service. Please see the Marketing section below for more information.

To personalise your customer experience and improve our service: We use your information to provide you with a more personalised service. This might include personalising the communications we send to you with preferences, sending you only with advertising that we

think you might like and/or enhancing your expedition or event experience (on the basis of our legitimate interests to present you with the right kinds of products and services). We may also record and/or monitor calls in order to improve our customer service.

To ensure security and protect our business interests: In certain circumstances, we use your information to ensure the security of our services, buildings, and people, including to protect against, investigate and deter fraud, unauthorised or illegal activities, systems testing, maintenance and development (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so);

To process your job applications: We will use your information to process any job applications that you submit to us, whether directly or via an agent or recruiter (speculatively or in response to any ad) (on the basis of our legitimate interest to recruit new employees or contractors);

To optimise our site: If you use our site, we will use your information to ensure that the content from our websites are presented in an effective manner for you and your device, to provide you with access to our site in a manner that is effective, convenient and optimal, and to provide you with content that is relevant to you, using site analytics and research and in certain circumstances combining that with other information we know about you (on the basis of our legitimate interests to operate and present an effective and convenient website to our website users);

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences: This is necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To conduct research: We use your information to carry out aggregated and anonymised research about general engagement with our services and systems, or if you choose to participate in customer surveys, consumer focus groups and research (on the basis of our legitimate interests to improve our products, services and customer service); and

To comply with our legal obligations: In certain circumstances, we will need to use your information to comply with our legal obligations, for example to comply with any court orders or subpoenas (on the basis of our legitimate interests to comply with a legal obligation).

WHAT ABOUT OUR MARKETING PRACTICES?

When we will get in touch with you

One of the other reasons we sometimes collect your information is so that we can form a view on what we think you may want or need, or what may be of interest to you. With this information we decide which products, services and offers may be relevant for you and what marketing you may be interested in.

We keep you up to date with our latest offers, partnerships, sales, promotions, competitions that we think might be of interest/relevance to you.

We will only contact you in this way if:

- You have signed up to receive marketing communications from us or and have not later told us that you don't want to hear from us.
- You have made a booking with us and have not told us that you do not want to hear from us.

What if I don't want to receive marketing?

We never want to send our marketing to someone who isn't interested in receiving this content. If you have decided that you no longer wish to hear from us, you can unsubscribe from marketing by clicking on the 'unsubscribe' link included in all of our e-mails or by contacting us.

Third parties and marketing

We do not pass your information to other parties for marketing purposes unless you agree to us doing so. We will get your express opt-in consent before we share your personal data with any company outside Adventurous Ewe for marketing purposes.

Sometimes we may use 3rd parties to send the communication to you on our behalf. We use a third-party provider Mail Chimp to deliver our email marketing. However, these companies do not have the right to send marketing to you for their own purposes.

The marketing material we send to you we may occasionally also include information about selected business partners who provide services closely related to our own product.

WHEN DO WE SHARE YOUR PERSONAL DATA?

In order to provide you with the services and on the lawful grounds described above, we may share your personal information with third parties such as:

- **Third party suppliers we work with to provide your booking and our other services to you.** We may share your information with parties such as travel agents, booking agents, airlines, ground handling agencies, hotels, tour operators, transport companies, excursion providers, airport authorities, insurance companies and car hire companies.
- **Other suppliers that we work with in connection with our business.** We share your information with third party suppliers that we use to provide services in connection with the experiences we offer to you. This might include marketing agencies and/or companies that run our marketing campaigns, IT developers, service providers and hosting providers, third parties that manage promotions or competitions, third party software companies ground agents, site analytics providers, our chief medical officer, medical service providers and credit card screening companies;
- **Airports, immigration / border control and/or other government authorities.** Sometimes we have to provide 'Advance Passenger Information' about you to border or immigration authorities of the country of your travel destination. This would usually be the basic information contained in your passport but the laws of certain countries may require additional information. We will provide this information when we are required to do so.
- **Third parties for marketing.** We share your information with any third party that you consent to our sharing your information with for marketing purposes;
- **Credit references and fraud prevention agencies.**
- **Courts or advisors.** We may have to share your information with other third parties (such as legal, accountants or other advisors, regulatory authorities, courts and government agencies) to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law; and
- **Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets.** Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

WHEN DO WE SEND YOUR DATA OUTSIDE THE EEA?

We will only send your data outside the European Economic Area ("EEA") to:

- follow your instructions
- comply with a legal duty
- work with our suppliers and third parties who we use to help deliver our services
- Some of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA. If we do transfer information to parties outside of the EEA, we will make sure that it is given a similar degree of protection.

YOUR PERSONAL DATA RIGHTS

What are your rights?

We want you to feel reassured that you have control of your personal information. With this in mind, we have explained below the rights you have in relation to the personal information we hold about you:

- The right to be advised of how we will use your personal information. This is set out in this privacy policy and we do our best to provide you with as much information as we can at the point at which you pass us your data.
- The right to ask us to correct any information you believe is incorrect.
- The right to ask us to not to use your information for marketing purposes.
- The right to receive a copy of the personal data we hold about you or to request that we transfer this to another service provider.
- In certain circumstances, the right to ask us to stop using information about you.
- The right to ask us to limit or cease processing or erase information we hold about you in certain circumstances.
- The right to withdraw consent that you have provided to us to use your personal information.

How can you exercise your rights?

You can exercise these rights over your data by contacting us or by checking the applicable boxes on forms where we collect your information or to tell us that you don't want to participate in marketing. You can also unsubscribe from any marketing circulation lists you are on by scrolling to the bottom of the e-mail and clicking the 'unsubscribe' link.

We will comply with your requests, unless we have a lawful reason not to do so. We may need you to provide additional details to confirm your identity in order to process your request.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

HOW LONG DO WE KEEP YOUR DATA FOR?

We will only keep your personal data for as long as necessary to fulfil the purpose we collected it for, including for the purpose of satisfying any legal accounting or reporting requirements.

We operate a data retention policy and look to find ways to reduce the amount of information we hold and the length of time we hold it for.

By law we have to keep basic information about booking and our customers for six years for legal claims and tax purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

OTHER PRIVACY INFORMATION

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Third-party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Changes to this privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 16th January 2019.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

HOW TO CONTACT US

We have appointed a Data Champion who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Champion using the details set out below.

Data Champion
Adventurous Ewe Ltd
52 Ty Mawr Road, Deganwy, LL31 9UB
data@adventurousewe.co.uk

Please contact us in the first instance if you have any concerns. If we are unable to resolve your concern, you have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or the relevant data protection authority where you live.