# RED SAVANNAH

# **PRIVACY POLICY**

We take our responsibilities as a data controller seriously; this Privacy Policy explains how we ("Red Savannah Ltd") will use your personal information. For the purposes of data protection legislation, we are the data controller and also use third parties to process your data on our behalf.

# STORAGE AND USE OF INFORMATION

Red Savannah require personal information to interact with our clients, produce quotations/proposals, respond to our clients' enquiries and fulfil the bookings made with us. As such we process the following information:

# Information that you provide voluntarily

Red Savannah require personal information to interact with our clients, produce quotations/proposals, respond to our clients' enquiries and fulfil the bookings made with us. We ask you to provide certain information voluntarily. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information	Why we collect it
Contact information	To communicate with clients regarding their requirements and preferences, send quotations/proposals, organise subsequent booking arrangements and send any official booking documentation to the client. Contact information is also stored to identify inbound communications, to authenticate clients when they contact us and may also be used in emergency situations if necessary.  E-newsletters are sent out to those who have submitted an enquiry, specifically expressed interest in receiving information from Red Savannah, or signed themselves up, unless they actively choose to opt out.  From time to time, we may send out direct mail (such as our brochures, leaflets or other Red Savannah collateral) to those who have submitted an enquiry, specifically expressed interest in receiving information from Red Savannah, or signed themselves up, unless they actively choose to opt out.  Information is collected online to enable us to expedite the information requested. This may include a request to join our e-newsletter list, receive a brochure, create a 'Wish List', enter a competition or prize draw, make an enquiry or submit a booking form.
Payment information	In order to take payments at various stages of the booking, to hold as security deposit and to make refunds if required
Disability, dietary and medical requirements. We treat this information with sensitivity and will only share this with your agreement.	In order to provide relevant support and tailor the booking arrangements around accommodating the disability, dietary or medical requirements.
Passport information	In order to fulfil your travel arrangements where required by providers which form part of the booking.
Details of additional passengers (including passport and contact information)	In order to confirm accommodation numbers, book flights and enable person-specific travel arrangements.
Information regarding any membership of loyalty schemes	To provide the best value package for your booking.



Any other details you provide about yourself and your party that you deem important for us to know in the process of delivering your booking	To ensure your booking is tailored to your requirements.
Travel preferences	Information is collected online and over the phone to enable us to expedite the information requested. We use your information to provide you with a more personalised service, for example by tailoring the communications that we send to you with your preferred destinations and ensuring the best possible travel experience, booking after booking, serving you only with advertising that we think you might like and/or ensuring you have all the information you have requested from us. We do this on the basis of our legitimate interests to present you with the most suitable and interesting products and services.
Job applicant information	If you are applying for a role at Red Savannah, any personal information that is provided as part of the recruitment process will only be used for the purpose of processing your application.  We will use your contact details to get in touch with you to progress the application and any other information provided by you to assess your suitability for the role for which you have applied.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

## Information that we collect automatically

We may also collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

### Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including information about your booking from travel agents and other travel service providers), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include contact details, preferences, interests, passport details and we use the information we receive from these third parties to operate bookings and maintain and improve the accuracy of the records we hold about you.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

# **LEGAL BASIS**

The legal basis upon which we use your information varies depending on the services we are providing for you. The primary basis is to satisfy our role as a tour operator acting on behalf of our clients to plan and make travel arrangements. We use the information in order to fulfil our contractual obligations to you in providing our services. We also process it in accordance with our legitimate interests (such as maintaining a record of the requirements and preferences our clients have communicated in order to deliver a truly bespoke travel experience for them, preventing fraud, and direct marketing). We sometimes (such as in relation to some direct marketing activities) rely on consent.



Please note that when you make a booking via a travel agency, your travel agency will have different privacy policies from our own and we advise you check what these are. When they send your information to us, we process them as described in this privacy policy.

### **SHARING PAGES**

We use sharing functionality to enable visitors to our website to conveniently share pages which they may find of interest via their preferred social media communications, such as Facebook and Twitter. When you do this, we collect the metadata that indicates that this has happened (which we use to understand how our website is being used and what products users are interested in) but do not gain any access to your social media accounts. Please note that social media sites have their own privacy and security features and we urge you to ensure your privacy settings on these sites are appropriate to your requirements before sharing pages.

#### COOKIES AND SIMILAR TRACKING TECHNOLOGY

We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice redsavannah.com/cookie-policy.

#### SHARING YOUR INFORMATION

We may disclose your personal information to the following categories of recipients:

- to our group companies, third party services providers and partners who provide data processing services to us (for
  example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who
  otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when
  we collect your personal information. We require these service providers to process your personal information for two
  reasons:
  - a. for the purpose of delivering a service necessary for the operation of your booking with us. This requirement to process your information does not extend beyond the scope of the booking and we request that providers do not retain the information for any longer than it is needed;
  - b. for the purpose of delivering direct mail fulfilment services, data cleansing and general data management services;
- to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to an actual or potential buyer (and its agents and advisers) in connection with any actual or proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Notice;
- to any other person with your consent to the disclosure.

If you would like to know about the third parties specific to your booking, please contact us to find out more (Telephone: +44 (0)1242 787800 or E-mail: <a href="mailto:inspired@redsavannah.com">inspired@redsavannah.com</a>).

# **INTERNATIONAL DATA TRANSFERS**

Red Savannah are based within the United Kingdom but work with a number of suppliers and third parties that fall outside of the European Economic (EEA) and will have different regulations determining how personal information is handled (and, in some cases, may not be as protective). For some bookings, it is necessary that information that we have collected about you will be sent to and held in countries outside of the EEA who form part of the booking. Where we do transfer your information to suppliers based outside of the EEA, we will take all steps we can to ensure that it is adequately protected and used in accordance with this Privacy Policy.

Our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

We have implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.



#### YOUR DATA PROTECTION RIGHTS

You have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the "To contact us" heading below.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "To contact us" heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using: (Telephone: +44 (0)1242 787800 or E-mail: <a href="inspired@redsavannah.com">inspired@redsavannah.com</a>).
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

# HOW DOES RED SAVANNAH KEEP PERSONAL INFORMATION SECURE?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include:

- Your personal information, as listed above, is held in a password protected database on a secure server only accessible to relevant, authorised employees of Red Savannah Ltd. When details are submitted online, they are received in a format only accessible by Red Savannah employees and our web-site support team with the necessary authorisation levels and password(s) to access the information. The confidentiality of your information is vital to us so we follow internal policies regarding the handling, storage and retention of information that seek to ensure your information is kept secure.
- Your information is collected and stored securely together as part of a booking file relating to your trip.
- For recruitment purposes, ensuring that only those involved in the recruitment process are able to access information.

## **DATA RETENTION**

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

We want the booking experience to be as easy and convenient as possible, as such we retain the personal information you provide for up to a duration of up to five years following your most recent trip so that it can be used to get in touch with you and for any future bookings you make. Your passport details will be automatically deleted from our systems two years after the return date of your latest booking.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Applicants to Red Savannah are added to our Talent Pool, enabling them to be considered for similar roles that may open up within a three year period. If the applicant is not interested in any other roles other than the specific one they have applied for, their data will be retained for the duration required to make a recruitment decision about the specific role. Otherwise, all applicant data is kept for three years, where after it is deleted due to being out of date.



# **TO CONTACT US**

If you have any queries or concerns about our use of personal information, please do not hesitate to contact us. We want to make sure that the personal data we hold about you is up to date and accurate. If any of your details need changing please let us know by calling or emailing us and we will amend them for you. Under the terms of the current Data Protection legislation, you can request a copy of the details we hold and process about you on our internal systems and that is being processed by Third Parties on our behalf. To request a copy of your information, please write to us (stating your name, the purpose of your request and a contact address and telephone number) at:

Red Savannah Ltd Eagle Tower Montpellier Drive Cheltenham Gloucestershire GL50 1TA United Kingdom

Telephone: +44 (0)1242 787800 E-mail: <a href="mailto:inspired@redsavannah.com">inspired@redsavannah.com</a>)

Please be aware, we may need you to provide additional information (such as to confirm your identity and/or to confirm what information you wish to access) in order to process your request.

If you believe Red Savannah has not adequately addressed your concerns in a timely and satisfactory manner, you have the right to complain to the Regulator (Information Commissioner's Office).

This is the latest version (v.3.0 – 17/01/2024) of our Privacy Policy, it supersedes any previous versions. We reserve the right to amend our Privacy Policy from time to time.

