

# PRIVACY POLICY

RIGHTFOOT, Unit 1, Burnt Oak Business Park, Waldron, East Sussex, TN21 0NL  
E. ben@rightfoot-uk.com P. +44 (0)1892 750900 [www.rightfoot-uk.com](http://www.rightfoot-uk.com)

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**This privacy policy explains how we, RightFoot Adventures, 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.**

## What Information We Might Collect About You?

We do our best to keep the information we collect about you to the minimum necessary. We may collect, use, store and transfer different kinds of personal information about you – including:

- Details about you: Your first and last name, title, gender, e-mail address, telephone number, date of birth, meal and other travel preferences or dietary requirements.
- 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, 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.
- 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 and any medical conditions you have will ensure that the trip is suitable for you and any necessary adjustments are made.

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?

We may collect identity and contact data you give us 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 a holiday or other service (such as a flight, hotel, transportation or special assistance) via our website, by phone or email;

- fill in part of the booking information on our site but do not complete the booking;
- 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;

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.

We may receive personal data about you from various third parties, such as airlines, hotel providers or other parties we work with if you make a complaint to them.

## What Do We Use 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 direct marketing communications to you via e-mail. 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 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, brochures, 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 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).

## When You Might Receive Marketing Communications From Us

One of the other reasons we sometimes collect your information is so that we can contact you about products, services and offers that 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 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.

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.

We do not pass your information to other parties for marketing 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 charity partners, travel agents, booking agents, airlines, hotels, tour operators, transport companies, excursion providers, airport authorities, insurance companies, car hire companies, ground handling agencies, and cruise companies.
- Other suppliers that we work with in connection with our business. We share your information



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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 party software companies ground agents, site analytics providers, and medical service providers;

- 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.
- 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 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 Of 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

You have control of your personal information, and below are 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.

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?

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 1 March 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.

**RightFoot Adventures Ltd**  
Unit 1, Burnt Oak Business Park  
Waldron  
East Sussex  
TN21 0NL  
[rf@rightfoot-uk.com](mailto:rf@rightfoot-uk.com)

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](http://www.ico.org.uk)) or the relevant data protection authority where you live.

## Cookies

When you visit our websites we use cookies. Cookies allow us to identify the computer or device you're using to access our websites - but we can't identify you personally. You can set up your web browser to refuse cookies, but this means you won't be able to book on our website or use all of its features. We use cookies for collecting information: This means we can learn more about how you use our website so we can improve our products and online experience.

