



## Privacy Policy - Full Version

### Our privacy commitment to you

#### Why you should read this

We are committed to looking after the data you have given us, making sure it's used responsibly, and that it is only shared in the ways you expect. Your personal details are in safe hands: we will only use them for the purposes of providing our travel-related services to you, to improve the services we offer, and to provide you with latest news and updates via our group partners. We will never share your personal details with other companies for marketing purposes unless you've given us explicit permission.

This Privacy Policy will inform you as to how we look after the personal data that you provide to us or we collect from you when you visit our website, make an enquiry and/or purchase services from us. This Privacy Policy tells you about your privacy rights and how the law protects you.

This is the full version of our Privacy Policy you can read the plain English version here. This Privacy Policy forms part of your terms and conditions of booking with Globus Family of Brands companies.

#### Who we are

It's important that you know who actually holds your personal data.

Tourwise of London Ltd. (Tourwise) is part of the Globus Family of Brands, an international group of companies providing escorted tours and river cruises to customers around the world. These brands include Globus, Cosmos, Monograms and Avalon Waterways. Tourwise facilitates the provision of service for these Brands in the UK & Ireland. Tourwise holds your personal data on behalf of all of our Globus Family of Brands companies (and is a 'data processor' for the purposes of relevant data protection law).

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact us using the details set out below.

#### Contact details

Our full details are: Tourwise of London Limited, a company registered in England and Wales (company registration number: 1165000) with its registered address at Avalon House, 72 Lower Mortlake Road, Richmond-upon-Thames, Surrey. TW9 2JY

Email address: [gdpr@globusandcosmos.co.uk](mailto:gdpr@globusandcosmos.co.uk)

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

#### What personal data do we receive about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may use, store and transfer different kinds of personal data about you which we have grouped together follows:



- **Identity Data** includes first name, last name, marital status, title, date of birth, gender and passport information.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes payment card details.
- **Special Categories of Personal Data** (or sensitive personal data) may include any relevant information about your health, medical conditions, disabilities and/or religious dietary or other requirements (if applicable).
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Profile Data** includes purchases made by you, your interests, preferences, feedback and survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical data for evaluation purposes. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your tour feedback to evaluate the performance of a particular tour. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

### **Third party personal data that we collect**

When you book a holiday with our Globus Family of Brands companies, we will need to ask for personal data (including Identity Data and Contact Data) for your emergency / next of kin contacts for while you are on holiday. We need this information to comply with our obligations in providing the holiday you've booked. It is your obligation to ensure that you make such third parties aware of this Privacy Policy.

### **How is your personal data collected?**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - book an excursion.
  - complete questionnaires or surveys; or
  - give us some feedback.
- **Automated technologies or interactions.** When you make your holiday booking with one of our Globus Family of Brands companies then the data we require to fulfil our contractual obligation to facilitate the provision of your holiday, is securely transmitted to us.

**How we use your personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to perform the contract we have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we need to comply with a legal or regulatory obligation;
- in the case of Special Categories of Personal Data, where you have provided your explicit consent to such processing of that data. You have the right to withdraw your consent to such processing at any time, but please aware that this may mean that we are unable to provide some or all of the services that you have booked with us (and our standard cancellation terms will apply).

**Purposes for which we will use your personal data**

We have set out below, in a table format, 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. We have also identified what our legitimate interests are where appropriate.

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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Data subject	Purpose of processing / activity	Type of data	Legal basis for processing the data	Retention period
Customer	Performance of contract for services, including: (a) making arrangements for the holiday; (b) managing payments, fees and charges; (c) collecting and recovering money owed to us (d) evaluating our services and those of 3 <sup>rd</sup> parties in the	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Special Categories of Personal Data (f) Travel information	(a) Necessary to fulfil our contractual obligations to the customer (b) Necessary for our legitimate interests (to recover debts due to us) (c) Legal requirement (to collect passport details government bodies and to share personal data with government authorities in the UK and in other countries, such as those responsible	7 years after return from holiday in the event of a customer complaint.

	provision of the holiday		for immigration, border control, security and anti-terrorism) (d) Customer's explicit consent (to process health information)	
Other traveller(s) on a holiday	Performance of contract for services, including making arrangements for the holiday.	(a) Identity (b) Contact (c) Special Categories of Personal Data (d) Travel information	(a) Necessary for the traveller's legitimate interests (to provide the holiday for them) (b) Legal requirement (to collect passport details government bodies and to share personal data with government authorities in the UK and in other countries, such as those responsible for immigration, border control, security and anti-terrorism) (c) Traveller's explicit consent (to process health information)	7 years after return from holiday in the event of a customer complaint.
Customer and other traveller(s) on a holiday	Processing of emergency contact / next of kin information	(a) Identity (b) Contact	Necessary to protect the vital interests of the customer and/or other travellers	Destroyed after return from holiday
Customer	To provide the requisite booking office with additional data for the potential facilitation of future holidays.	(a) Identity (b) Contact (c) Profile (d) Usage  Marketing and Communications	Necessary for our Globus Family of Brands companies legitimate interests (to study how customers use our products/services, to develop them and grow our business)	Destroyed as soon as transmitted to relevant booking office.

### Tailoring your communications

Globus Family of Brands always want communications to be relevant, useful and inspiring, to help you choose your next dream holiday.



Tourwise does not perform any marketing communications. We provide this data to our Globus Family of Brands companies with whom you booked your holiday.

Tourwise does not share your personal data with any company outside the Globus Family of Brands group of companies for marketing purposes.

We transmit the information you have provided to the booking office, such as the destinations you prefer to travel to, where you live and your age, to tailor communications they send you. We do this to ensure you always get a great service fully tailored to your preferences, but if you would prefer we do not use these kinds of profiling techniques you can opt-out [here](#). If you opt-out, you may find your communications from us become less relevant to your interests.

### **Opting out**

You can ask request to stop receiving any marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting the booking office.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to, or collect by, us as a result of the purchase or provision of any services.

### **Keeping your data safe**

We promise we'll do all we can to keep your data safe. We will store your data securely, encrypt it when we share it, and only hold it for as long as we need to. 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 and why we would share your personal details**

First of all, we'd like to make a promise. We will never sell your information to anyone, and we will only share it with a partner organisation if you've given us explicit permission to do so or if it is necessary for the performance of the contract that you have with us (e.g. in order to provide your holiday). That means you won't end up with junk emails or intrusive phone calls when you trust us with your personal data.

### **When we have to share your details**

So that we can meet our obligations to you, such provide the holiday you've booked, we will pass your personal details onto our suppliers as we need to. This allows them to meet your requests, ensure you have a hassle-free holiday, and that they can get in touch if you need assistance.

In addition to the above, we may also share your personal data with the following third parties in the following circumstances:

- with 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.
- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request;



- to enforce or apply the Terms and Conditions or to investigate potential breaches; and/or
- to protect the rights, property or safety of Tourwise, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

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.

### **International Transfers**

Many of our booking entities are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Organisations that are based outside of the EEA may not be subject to data protection laws which offer the same rights and protections to you as is the case within the UK and the EEA.

Wherever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en);
- where we transfer data to Globus Family of Brands companies, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en); or
- where we transfer data to the US booking entity, they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

### **Your personal details when you book through a travel agent**

If you have booked through a travel agent, they may have separately asked for your permission for them to contact you or send you marketing information. Please refer to the travel agent's own privacy policy to understand how they process your personal data. If you believe a travel agent is using your data in a way you have not consented to, you should contact the agent directly.

### **How long will you use my personal data for?**

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



To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set out in the table above. For further information, please contact us.

### **Your legal rights (UK/EU & EEA citizens only)**

Under certain circumstances, you may have the following rights under data protection laws in relation to your personal data:

- Right to request access to your personal data.
- Right to request correction of your personal data.
- Right to request erasure of your personal data.
- Right to object to processing of your personal data.
- Right to request restriction of processing your personal data.
- Right to request transfer of your personal data.
- Right to withdraw consent.

You should be aware that, in some cases, if you ask us to delete or transfer your personal data, or if you withdraw your consent to processing (other than in respect of direct marketing), this may mean that we will not be able to continue with any booking you hold with us, and our standard cancellation terms will apply.

To find out more about data protection and your privacy, the Information Commissioner's website has information on all current data protection laws and your rights. Find out more at [ico.org.uk](http://ico.org.uk)

We're always happy to answer any questions as well. If you have any concerns or would like questions answered then [get in touch](#).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights set out above). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.