



## **Privacy Policy**

At Adventure Coordinators we understand that how we collect, use, disclose and protect your information is important to you.

This Privacy Policy sets out the types of personal information we receive and collect when you use our services, how we collect it, and what we do with it, as well as some of the steps we take to safeguard information. We hope this will help you make an informed decision about sharing personal information with us. In all your dealings with us you must ensure that others you represent are aware of the content of our Privacy Policy and consent to your acting on their behalf.

This Privacy Policy may be updated from time to time. You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes to this Privacy Policy.

References to 'Adventure Coordinators', 'we', 'our' and 'us' include Adventure Coordinators Inc and Vision Travel Solutions and its related entities.

References to 'related overseas entities' refer to overseas travel companies and destination management specialists we choose to work with.

### **The data we collect**

Depending on the circumstances, in the course of providing a service to you, Adventure Coordinators may collect and hold personal information such as:

- your name, date of birth, gender, postal address, telephone number, email address, passport details, medical information and travel insurance details (where applicable);
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries; and
- any additional information relating to you that you or a third party has provided to us directly or indirectly through our travellers' or agents' phone enquiry lines, websites, online presence, customer surveys or to our in-store or other representatives.

If you visit our website or use our mobile applications, we may also collect information that is not personal information to improve the experience for our customers. This information may include the pages you visit, browser type and language, and the date and time of your visit. We cannot identify you individually from this information. Some of this information is collected using cookies.

When you are travelling with us, we may take video and images of you that could be used in brochures, in our advertising, and on our website. Adventure Coordinators will not use such images (such as photograph, videotape, film or pictorial representation or recorded voice) without your express consent in writing.

### **How we collect the data**

You may volunteer this information when you request information from us, contact us (and vice versa),

make a booking, register interest for and/or enter a competition, subscribe to one of our newsletters, use our website(s)/apps, link to or from our website(s)/apps, connect with us via social media or any other engagement we or our business partners have with you.

We may also receive the information from a third party, for example:

- from people making travel bookings on your behalf;
- from market research and data companies contracted by us to obtain information so that we may improve and market our products and services;
- from other companies such as Vision Travel solutions and our related overseas entities;
- from partners performing services on our behalf; and
- your insurer, their agents or medical staff may disclose relevant information and sensitive personal information with us in circumstances where we/they need to act on your behalf; or in the interest of passengers or in an emergency.

We will update your information whenever we can to keep it current, accurate and complete.

You represent and warrant to us that you have obtained all required consents and are fully authorized to disclose all personal information you provide to us including without limitation personal information of your friends and family members provided in connection with making travel bookings.

### **How the data is used?**

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of customer service.

We may collect, hold, use and disclose your information for the following purposes:

- administering services we are providing to you such as arranging your tour booking
- some countries will only permit travel if you provide your advance passenger data. These requirements may differ depending upon your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate
- manage our relationship with you, including updates about your tour booking and handling complaints
- to contact you in the event of an emergency
- combining information collected from you at different times for the purpose of audit, research and analysis to provide a better customer experience, including customising online content for you to identify and tell you about services we think you may be interested in, including sending email newsletters or sending printed materials to your postal address
- providing relevant information, which may include sensitive personal information, to insurers, their agents and medical staff in circumstances where we/they need to act on your behalf or in the interest of passengers or in an emergency.
- to make improvements to our site(s) and make it easier to find the information you are looking for for identification of fraud or error or for regulatory reporting and compliance

We are only permitted to store your personal information for as long as necessary having regard to the purposes for which it was collected or as otherwise required by law. We may therefore delete your personal information after a reasonable period of time and, if you have not used our services for some time, you may have to re-enter or re-supply your personal information to us.

We will not disclose your personal information otherwise than as described in this Privacy Policy

without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), disclosure is authorised or required by law or disclosure is otherwise permitted by applicable privacy laws.

### **Personal information disclosed to third parties**

We may disclose your personal information as follows:

- We may share your personal information with our related overseas entities for the purposes of providing products or services to you, research and marketing purposes. Any marketing purposes will be conducted in accordance with our 'Marketing and Privacy' statement below.
- We may disclose your personal information to our employees, contractors or third party service providers located in Canada or overseas for the purposes of the operation of our website or our business, fulfilling requests by you, managing your bookings, responding to your enquiries and to otherwise provide products and services to you, including, without limitation, to airlines, tour companies, travel agencies, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants.
- We may share aggregated non-personal information with third parties, such as our travel industry partners to analyse trends and further improve our service to you.
- We may share information with third parties in limited circumstances without your consent where we reasonably believe the disclosure is necessary to lessen or prevent a threat to life, health or safety, or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), where disclosure is authorised or required by law or disclosure is otherwise permitted by applicable privacy laws
- In order for you to travel abroad, we may disclose your personal information where disclosure is required by government authorities at the point(s) of departure and/or destination to process your information for immigration, border control, security and anti-terrorism purposes.
- Where you provide us personal information for the purposes of booking travel related services on your behalf or on behalf of another person, we must provide such personal information to the travel providers you have selected for the purposes of completing the booking. We have no control over how travel providers use, disclose or store personal information. Please ensure you agree with the privacy practices of the travel providers you select prior to providing us your personal information for the purposes of booking travel related services with such travel providers. You acknowledge and agree that we provide your personal information to such travel providers solely as your agent and not as the principal holder and we will not be required to ensure their compliance with applicable privacy laws, this privacy policy or otherwise be liable or accountable for your personal information including without limitation their use and disclosure of your personal information.

### **Trans-Border Data Flows**

When you provide, or otherwise allow us to collect, your personal information, you consent to your personal information being disclosed to certain overseas recipients, as set out below.

In providing our services to you, it may be necessary for us to disclose personal information to relevant overseas entities. For instance, we may need to disclose personal information to our related overseas entities in order to respond to your enquiry. We may also need to disclose personal information to overseas recipients other than our related overseas entities (third party overseas recipients), such as relevant overseas travel service providers for the purpose of arranging your booking with them.

Where we disclose your personal information to a third party overseas recipient, your personal information will generally be received in the country in which the recipient will provide the services to you or in which their business is based. Unless otherwise contemplated herein or otherwise permitted or required by applicable law, we will only disclose your personal information to these overseas recipients in connection with facilitation of your travel booking and/or to enable the performance of administrative and technical services by them on our behalf.

We deal with many different service providers all over the world, so it is not possible for us to set out in this Policy all of the different countries to which we may send your personal information. However, unless otherwise provided for herein, all your personal information will be protected in accordance with this Privacy Policy. Please note that when your personal information is located outside of Canada it will be subject to the laws of the country in which it is situated. If you have any specific questions about where or to whom your personal information will be sent, including our use of service providers outside Canada, please contact us in writing using the contact details below.

Companies to whom personal information is disclosed which are registered in the United States may be required to provide information under the USA PATRIOT Act H.R. 3162.

### **Security of Information**

Adventure Coordinators has implemented various physical, electronic and managerial security procedures in order to protect personal information from loss and misuse, and from unauthorized access, modification, disclosure and interference. Adventure Coordinators regularly reviews security and encryption technologies and will strive to protect your personal information as fully as we protect our own confidential information.

### **Access to your information**

To access the information, we hold about you, or to make corrections or updates to your personal details, please contact us in writing using the contact details on our website. We will need to verify your identity before disclosing personal information. Please allow up to 20 business days for us to process your request, however we will endeavour to deal with your request sooner.

We offer you choices when we ask for personal information, whenever reasonably possible. You may decline to provide personal information to us and/or refuse cookies in your browser, although some of our features or services may not function properly as a result. For example, if you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

We will provide you access to your personal information upon request, within reason, and to let you correct such data if it is inaccurate and delete it.

You can ask us to update any inaccurate, incomplete or out-of-date information we hold about you using the contact details on our website. There is no fee to make an enquiry or request in relation to your information, or for us to add to, correct or update our records.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

### **Marketing and privacy**

We may from time to time wish to use your personal information to identify new or existing products that we believe may be of interest to you. We may communicate this via email, phone or your postal address. In accordance with the specific requirements of the Canadian Anti-Spam Legislation we will obtain your express consent prior to sending commercial electronic messages.

If you no longer wish to receive these updates via email, you may opt-out by clicking the unsubscribe link contained in the message. You can also contact us using the contact details below to opt-out of receiving phone and postal updates. You can provide your express consent in future if you wish to receive these updates again.

### **Use of TOOLS/"COOKIES" and links to other websites**

If our contact and dealing with you is via our website(s), we may use cookies. To find out more about the types of cookies on our website(s), how we use cookies, to disable them or to change your preference and more, please refer to the information provided on our website(s). By using our website(s), you consent to our use of cookies.

Our website(s) may contain links to third party websites, micro-sites or analytical tools (eg Google) not controlled or owned by us, such as reference, review, ancillary products and services sites or websites owned by our sister companies. It is your responsibility to check the status of these sites before using them. Please read their applicable privacy policies and terms of use carefully.

### **Statement on cookies**

What are cookies?

When you visit our websites we use cookies. Cookies are small text files placed on your computer by us or our partners. Cookies allow us to identify the computer or device you're using to access our websites - but we can't identify you personally. This information is sent back to our systems as you move around our website.

Cookies are unique to the web browser you're using - so if you're using a desktop computer as well as a mobile, different data will be collected for each. You can find more information on the About Cookies website [www.aboutcookies.org/](http://www.aboutcookies.org/)

Cookies can be set by the owner of the website you're on. These are known as 1st Party Cookies. There are also 3rd Party Cookies that can be set by partner websites. Only the owner of the cookie can see the anonymous information it collects.

You can choose to accept all cookies, reject 3rd Party Cookies or reject all cookies by changing your internet browser settings. If you don't accept cookies, some features of our website won't work.

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.

By using our websites, you agree to us using cookies as set out in this statement.

### **Types of cookies we use**

Third party vendors use cookies to help us evaluate the effectiveness of our marketing and deliver more tailored advertisements to you on other sites. When you visit certain sections of the website, Google Analytics, a website analytics service provided by Google, Inc (“Google”), will place cookies on your computer’s browser. The information generated by the cookies about your use of the website is transmitted to Google. This information is then used for the purpose of compiling statistical reports to enable us to measure and analyse the number of visits to the site and its pages, the average time spent on the site and the pages viewed. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personal data of visitors to our website. We will not associate any data gathered via use of cookies with any personal data from any source as part of our use of Google Analytics. For further information about Google Analytics please visit

[www.google.com/analytics](http://www.google.com/analytics) and for details of Google Analytics’ Privacy Policy  
<http://www.google.com/intl/en>.

You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on which you may access at <https://tools.google.com/dlpage/gaoptout/>.

### **Refusing cookies**

You can change your browser settings to accept or refuse all cookies, choose which cookies you want or don't want, or ask to be notified when a cookie is set. Use the help feature in your browser to see how.

### **Changing your mind after you've accepted our cookies**

If you change your mind after you've accepted our cookies, you'll find an option within your internet browser to clear cookies that have already been set. Use the help feature in your browser to see how. You'll then need to change your browser settings to refuse cookies in future.

Just so you know, you won't be able to benefit from all the features of our website and email newsletters or book online with us if you refuse cookies.

### **Lodging a complaint**

If you believe that your privacy has been breached, please contact us using the contact information on our website and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.