

# Samurai Snow Privacy Policy

Samurai Snow Limited is committed to protecting your privacy and promise to collect, process and share your data safely and securely. Our Privacy Policy tells you how we do this and what your rights are. Any personal data processed in line with our Privacy Policy is controlled by us.

## **Your personal data**

This refers to a combination of information such as your name, contact details, travel preferences and special needs/disabilities/dietary requirements that you supply us or is supplied to us, including any information about other persons on your booking ("your information"). Your information is collected when you request information from us, contact us (and vice versa) or make a booking. You are responsible for ensuring that other members of your party are aware of the content of our Privacy Policy and consent to your acting on their behalf in all your dealings with us.

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

## **How we use of your personal data and our legal basis for doing so.**

1a) How: For the purpose of providing you with our services, including your flight, holiday or insurance, etc., we may disclose and process your information outside the UK/EU. In order for you to travel abroad, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your information for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate.

1b) Legal Basis: Necessary for our legitimate interests (to ensure that we are able to provide the best service to you) and for compliance with a legal obligation.

2a) How: We may collect and process your information for the purposes set out in our registration with the Office of the Information Commissioner, and disclose the same to our group companies for business purposes and also to companies and our service providers who act as "data processors" on our behalf, or to credit and fraud agencies (some of whom are located outside the UK/EU). These business purposes include administration, providing services (and contacting you where necessary), customer care, service quality, business management and operation, re-organisation/structuring/sale of our business (or group companies), risk assessment, security, fraud and crime prevention/detection, monitoring, research and analysis, marketing, customer purchasing preferences and trends, dispute resolution, credit checking and debt collection.

2b) Legal Basis: Necessary for compliance with a legal obligation.

3a) How: Information (such as health or religion) may be considered "sensitive personal data" under the Data Protection Act 1998. We collect it to cater to your needs or act in your interest,

and we are only prepared to accept sensitive personal data on the condition that we have your positive consent. By booking with us you also agree for your insurers, their agents and medical staff to disclose relevant information and sensitive personal data to us in circumstances where we need to act on your behalf or in the interest of passengers or in an emergency.

3b) Legal Basis: Your consent.

**If you do not agree to Our Use of Your Information above, we cannot do business with you or accept your booking.**

### **Direct Marketing Material**

1. We may from time to time contact you with information on offers of goods and services, brochures, new products, forthcoming events or competitions from our holiday divisions and our group companies. Our websites will assume you agree to e-communications when you make a booking.
2. Samurai Snow will not pass onto third parties, apart from Suppliers directly involved in your holiday.
3. If do not wish to receive such information or would like to change your preference, please refer to point (2) of "Your Rights" below.

### **How long we keep you personal data**

We will only keep 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.

At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you) for research or statistical purposes.

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.

In some circumstances you may be entitled to ask us to delete your data: see 'Your rights' below for further information.

## Your Rights

You have the right:

1. to request from us access to personal information held about you
2. to ask us not to process your personal data where it is processed on the basis of legitimate interests, if there are no compelling reasons for that processing;
3. to ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
4. to ask that we stop any consent-based processing of your personal data after you withdraw that consent;
5. to ask, in certain circumstances, to delete the personal data we hold about you;
6. to ask, in certain circumstances, for the processing of that information to be restricted; and
7. to ask, in certain circumstances, for data portability.
8. You have the right to ask in writing not to receive direct marketing material from us. If available, you can amend your previous preference on our website(s), use our "unsubscribe email", contact us via our website ([www.samuraisnow.com](http://www.samuraisnow.com)) or refer to our literature containing instructions. Once properly notified by you, we will take steps to stop using your information in this way.
9. For a list of our group companies or brands, please send us your request.
10. Please write to Samurai Snow Limited, Legal Department, 61 Blewbury Road, Didcot, OX11 9LE.

## Foreign Controls

Outside the European Union, note that controls on data protection in such countries may not be as strong as the legal requirements in the UK.

## Cookies

### What is a cookie?

Cookies are small files that are sent to your browser, for example Internet Explorer, Google Chrome or Firefox. They are stored on your computer's hard disk and only identify your computer, and not you personally.

The default location for these files is:

Windows: c:\Documents and Settings\{your\_username}\Cookies

Mac: Users\{your\_username}\Library\Cookies

There are two main purposes to cookies. The first is to add functionality like shopping carts, logging in as a particular user, remembering preferences and sharing links via social media.

Secondly, cookies are used by website owners to collect usage data and provide personalised suggestions and information.

### **How do we use cookies?**

We collect information relating to customer use and patterns. We use cookies and software tools to capture, measure and analyse site usage and related information.

When you are online but not using our website, to help us deliver advertising effectively and avoid repeating adverts, we work with carefully selected third parties who we allow to employ cookies on our site, on our behalf. These cookies allow us to provide advertising on other websites that are more relevant to a user's interests. The information that we collect and share is anonymous and not personally identifiable. It does not contain a user's name, address, telephone number or email address.

Specifically, on our website, we use a Javascript cookie to determine if the user has Javascript, in order to run certain elements of our website.

For more information about cookies set by our display advertising partners please visit [www.youronlinechoices.com](http://www.youronlinechoices.com).

More information about cookies, including instructions to amend your browser settings to refuse them can be found at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Monitoring**

To ensure that we carry out your instructions accurately, improve our service and for security and fraud, we may monitor and/or record:

1. telephone calls; and
2. transactions and activities at all points of contact. All recordings are and shall remain our sole property.

### **Security Statement**

We have taken all reasonable steps and have in place appropriate security measures to protect your information.

## **Changes to this Policy**

Any changes to this Policy will be either posted on our website, brochure and/or made available on request.

## **Third-Party Web Beacons**

We use third-party web beacons from Facebook & Google to help analyze where visitors go and what they do while visiting our website. Facebook & Google may also use anonymous information about your visits to this and other websites in order to improve its products and services and provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by Facebook & Google, please contact us at [info@samuraisnow.com](mailto:info@samuraisnow.com).

Privacy Policy was last updated on: 23<sup>rd</sup> May 2018