

SENDEROS Y PUEBLOS PRIVACY STATEMENT

PRIVACY STATEMENT EXPLAINED

Senderos y Pueblos understands and respects the importance of your privacy. We are committed to safeguarding your personal information and this statement outlines our commitment to you;

- we will be transparent about the information we collect and what we will do with it;
- we will use the information you give us only for the purposes described in our Privacy Statement;
- we will use the information to help understand your needs and provide more relevant offers;
- if you tell us to cease marketing messages, we will stop sending them (albeit we will continue to send important information relating to a product or service you have purchased to keep you informed about your booking and travel itinerary);
- we will put in place measures to protect your information and keep it secure;
- we will respect your data protection rights and aim to give you control over your own information.

We have appointed a Data Privacy Manager (jaime@senderosypueblos.com) who is responsible for responding to questions you may have.

INFORMATION WE COLLECT FROM YOU

We may collect information about you when you, or someone acting on your behalf, contact(s) us by phone, email, post or otherwise, and when you correspond with us via our website and online forms. Information that you provide us with can take many forms, including;

- when booking holiday arrangements, we will ask you to provide information such as;
 - your name, gender, date of birth, contact details (postal address, email address and telephone number) and marketing preferences;
 - your preferred rooming arrangements and other special requests.
 - the name and telephone number of an emergency contact person (whom we will only contact in urgent circumstances while you are away);
 - your travel insurance details;
 - where necessary, we may also request your passport details and other information directly required to provide your holiday arrangements;
- when you make a payment to us, we will receive information from you including details of your payment card or your bank account (this information is processed using a third party payment services provider and is not stored by us);
- on your return from holiday we e-mail or post a satisfaction survey to you. This gives us specific feedback on any issue you may have experienced, and statistical data we can amalgamate in order to monitor the quality of our holidays;
- when you participate in one of our surveys, competitions or prize draws, we may ask for information, such as your name, contact details, interests and marketing preferences;

- you may also provide us with written or photographic content for us to load on to our website, including reviews and articles.

INFORMATION WE MAY COLLECT FROM OTHER SOURCES

We may also collect information from publicly available sources and third parties, including:

- from a Travel Agent acting on your behalf in the sale of a travel arrangement to you, and sharing some information about you and your purchase with us;
- payment information from our payment services provider including debit/credit card numbers, bank account and other details in order to issue refunds;
- information relating to your use of any of our social network applications, pages or plugins.

INFORMATION WE MAY COLLECT WHEN YOU USE OUR WEBSITE

Our websites provide us with information about your use, including:

- details of the content that you view and interact with during a browsing session;
- technical information such as, but not limited to, service, product or server logs, IP address, time and location, domain, device and application settings, errors and hardware activity etc;
- interests and preferences that you specify during the curation of your holiday arrangements;
- email/chat communications you have with us may be monitored and logged.

SPECIAL CATEGORIES OF PERSONAL DATA

We may collect, use and share the following special categories of personal data about you only where it is strictly necessary in order to deliver the travel arrangements you have purchased (for example, to ensure appropriate food for those with serious/life threatening allergies);

- dietary requirements which may disclose health matters or your religious or philosophical beliefs;
- health, including information about any disability or medical condition which may affect the chosen holiday arrangements.

HOW WE USE THE INFORMATION THAT WE COLLECT

We may use the information we collect for a wide range of purposes to ensure we give you the best possible customer experience and ensure the appropriate performance of the contract, including;

GENERAL

- to share your data with third party service providers used in the delivery of your purchased holiday arrangements. These providers include;
 - accommodation, restaurants and transport providers;
 - equipment hire operators, including our cycling partners;
- to provide you with information on our products and services, and also to deal with your requests and enquiries regarding holiday arrangements;
- to contact you if we need more information or if there are changes to your travel arrangements;

- to provide customer care and to deal with any questions or issues that you have prior to, during, or on your return from holiday;
- to ask for your opinions on our products and services;
- to conduct prize draws, contests and other promotional offers;

MARKETING COMMUNICATIONS

We may use your information to send you brochures, newsletters and other communications if you have provided your prior consent or we are permitted under an identified and assessed legitimate interest.

STATISTICS

We may use your information to create anonymous, aggregated statistics about the use of our websites, products, and services, which we may share with third parties and/or make available to the public.

PRODUCT IMPROVEMENT

We may use your information to develop and improve new and existing products and services, recommendations, advertisements and other communications and learn more about our customers' holiday preferences in general.

PUBLISH YOUR REVIEWS, COMMENTS AND CONTENT

Where you provide us with product reviews, comments or content to our websites that are publicly visible, we may link to, publish or publicise these materials elsewhere including in our own advertisements.

SHARING INFORMATION ABOUT YOU

We will not use information about you in ways that are not explained in this Privacy Statement. We may share information about you in the following circumstances:

LEGAL AND BUSINESS PURPOSES

- to share your data with third party service providers used in the delivery of your purchased holiday arrangements;
- to government bodies and law enforcement agencies to prevent fraud, to comply with the law and to meet a reasonable request from such bodies;
- to third parties (including professional advisors) to enforce or defend the legal rights of Senderos y Pueblos or the terms and conditions of any Senderos y Pueblos product or service.

ANONYMOUS STATISTICS

We prepare anonymous statistics for a number of purposes. As we consider that you cannot reasonably be identified from this information, we may share it with trusted third parties such as our partners, advertisers, industry bodies, the media etc.

SHARING OF INFORMATION BY YOU

Some of our online services allow you to upload and share messages, reviews, photos, video and other content and links with others. We will obtain consent if we publish this information on our websites, marketing or social media profiles.

You should not expect any information that you make publicly available to others via our online services to be kept private or confidential and you should always exercise discretion when using such services.

MARKETING COMMUNICATIONS

BROCHURES AND OTHER PRINTED MATERIALS

We sell our holidays directly to customers and so sending out brochures and other marketing communications by post from time-to-time is very important to the way we do business.

We use data we have collected from bookings, brochure requests and other forms of engagement to decide what marketing information our customers may like to receive, and we have identified and assessed this as our Legitimate Interest.

We do however provide an opportunity to opt-out of this direct marketing during the booking or enquiry process and in subsequent communications. You may contact our Data Privacy Manager (jaime@senderosypueblos.com) at any time to opt-out of this direct marketing. We have found over the years that the majority of people welcome these communications and, those who do not, are happy to let us know so we can ensure no more are sent.

EMAIL COMMUNICATIONS

When we communicate with you, we will give you the opportunity to stop receiving our news and promotions:

- to unsubscribe from an email sent to you, follow the 'unsubscribe' link and/or instructions placed (typically) at the bottom of the email;
- Should you receive other marketing such as brochure mailings, you will need to opt-out separately by contacting us to change your marketing preferences.

GENERAL

You can contact us using the details in the following address:

jaime@senderosypueblos.com in order to change your marketing preferences at any time.

If you ask us to stop sending marketing communications, we will retain your personal information for the purposes of indicating that you do not want to receive marketing communications.

WHAT IS OUR LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION?

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the reason or reasons we collected and need to use your information. Under EU data protection laws in almost all cases the legal basis will be:

- because we need to use your information to process your booking, fulfil your travel arrangements and otherwise perform the contract we have with you;
- because there is a Legitimate Interest to use your personal information to operate and improve our business as a tour operator and travel provider (a Legitimate Interest assessment is performed prior to making this determination);

- because we need to use your personal information to comply with a legal obligation;
- because you have consented to us using your information.

HOW LONG DO WE KEEP PERSONAL INFORMATION?

We will keep your personal information for only as long as needed to fulfil the purposes described in this statement.

By law we have to keep basic information about our customers for legal and tax purposes (including identity, contact, financial and transaction data) for up to 7 years after they cease being customers.

SECURITY OF YOUR INFORMATION

We take a number of steps to protect your information from unauthorised access, use or alteration and unlawful destruction, including where appropriate:

- we are Payment Card Industry compliant when processing your payments;
- we put in place physical, electronic, and procedural safeguards in line with industry standards to limit access to the information we collect about you;
- we monitor our system for possible vulnerabilities and attacks to identify ways to further strengthen our security.

ACCESS TO YOUR INFORMATION AND YOUR RIGHTS

For a copy of the personal information that we store about you in our customer databases, please contact us at jaime@senderosypueblos.com. You will be asked to provide some proof of identification so that we can verify that it is you making the request.

This is in addition to your legal rights including;

- the right to access a copy of your personal information;
- the right to request the deletion or updating of any inaccurate personal data;
- and the right to object, in certain circumstances, to our processing of your personal data for direct marketing.

If you are concerned that we have not complied with your legal rights or applicable privacy laws, you may report it to the local data protection authority in the country where you are located.

CONTACT US

If you need further assistance or would like to make a comment, you can contact us in a number of ways:

1. By postal mail to Data Privacy Manager, Senderos y Pueblos, La Losa, 40420, Segovia, Spain.
2. By telephone on 0034 921447098
3. By email on jaime@senderosypueblos.com