

1. **About this policy**
2. **Our commitment**
3. **Who our Privacy Policy covers**
4. **Information We Collect**
5. **How we collect or generate your personal information**
6. **What do we use your personal information for**
7. **Use of your personal information for Direct Marketing**
8. **Information retention**
9. **Disclosure of your personal information**
10. **Your rights and choices**
11. **How third parties will handle your personal information**
12. **Location of your personal information**
13. **Keeping your data secure**
14. **How long do we keep your personal information?**
15. **"Do not track"**
16. **Changes to this privacy policy**
17. **Contacting us**
18. **Copyright Notice**
19. **Enforcement**

## **1. ABOUT THIS POLICY**

This is the privacy policy of Evan Evans Tours Ltd. (referred to as "we", "us" or "our"). We are incorporated under the laws of the United Kingdom. Our company number is 00573747, and our incorporation address or registered office is EVAN EVANS TOURS, 258 Vauxhall Bridge Road, SW1V 1BS, LONDON, UNITED KINGDOM.

This document sets out our privacy policy in respect of consumer personal information, which will govern the way in which we process any personal information that you provide us with. It serves as an expression of our commitment to protecting your private personal information. We adopt this policy to comply with the California Consumer Privacy Act of 2018 ("CCPA") as amended by the California Privacy Rights Act of 2020 ("CPRA"). Any terms defined in the CCPA/CPRA have the same meaning when used in this notice. Please see Section 9 below for the rights which the law provides you with in relation to your personal information.

We will provide a link to this privacy notice when you are using our website, providing any personal information to us, or booking any travel services with us and we will ask you to read and confirm you have read this document where we collect your personal information.

## **2. OUR COMMITMENT**

We respect your right to privacy, and we aim to ensure that you have a trustworthy experience with us, including when using our websites or shops and booking with or through us. We understand that you care about how your personal information is used by us, and we want to share with you the policies and practices we've adopted. This way, you can feel confident about how we handle the personal information that you entrust to us.

### **3. WHO OUR PRIVACY POLICY COVERS**

#### **3.1 Our customers**

Our privacy policy sets out how we process personal information relating to individuals who are booking or enquiring about booking travel services with or through us or who are the recipients of any travel services booked with or through us (e.g. you are the passenger for a booking or booking enquiry made by someone else for you), or who are customers or potential customers or recipients of travel services that can be booked with or through us.

#### **3.2 Examples of who this policy covers**

We include in this privacy policy personal information we process relating to: (1) individuals who are making any enquiry or booking with us or through us, and individuals in respect of whom any enquiry or booking is made (such as friends, family members, and tour group members, and officers and employees of businesses and organizations booking with or through us); (2) individuals in respect of whom any enquiry or booking is made with us by an agent; (3) where our customer is a business or organization, employees or individuals who are acting as representatives of that business or other organization, and individuals connected to that business or other organization, such as owners, partners, shareholders, and directors; (4) individuals who visit our website or other online sites operated by us or our contractors or affiliates; (5) individuals who create an online account (if applicable); (6) individuals whose personal information from other companies in our group (such as where you have consented to your personal information being disclosed to other group companies for marketing purposes); and (7) individuals or businesses from any other arrangement with us.

#### **3.3 When we are an information processor only**

This privacy policy does not apply where we are processing personal information strictly as a sub-contractor or information processor on behalf of a third party, and not on our own account. In this case, you should look to that third party, who will be answerable for how we process that personal information and its privacy policy.

#### **3.4 Terms used in this policy**

When we refer to "you" and "your" in this privacy policy, we refer to you, any such individual whose personal information we process from time to time.

When we refer to "process" or "processing" of your personal information, this includes collecting, recording, storing or holding your personal information, and anything we do with it, such as organizing, adapting or altering it, retrieving, consulting or using it, disclosing it or otherwise making it available to others, combining it with other information, and blocking, erasing or destroying it.

When we refer to "travel services" this covers all products and services which may be booked with or through us, such as bespoke holidays, package holidays, accommodation, tours, etc.

***Category***

***Examples***

***Collected***

A. IDENTIFIERS.

A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, account name, Social Security number, driver's license number, passport number, age, photographs, gender, address, telephone, mobile, fax, e-mail, social networking contact details, proofs of identity and address, copies of passports, driving licenses, and utility bills, card and other payment details, and financial information, health information relevant to your planned travel, and travel insurances held, results of searches carried out against you (such as to verify your identity, address, and credit status), your preferences, frequent flyer or travel partner program affiliation and member number, and any other information provided to us by or in relation to you which concern you as an individual or other similar identifiers.

YES

B. PERSONAL INFORMATION CATEGORIES LISTED IN THE CALIFORNIA CUSTOMER RECORDS STATUTE (CAL. CIV. CODE § 1798.80(E)).

A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card

YES

	number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
C. SENSITIVE PERSONAL INFORMATION (CPRA 2020)	Government-issued identifiers (such as social security, driver's license, state identification card, or passports), account log-in and financial information (such as payment card details), precise geolocation, Racial or ethnic origin, religious or philosophical beliefs , or union membership, genetic data, biometric information that may identify consumer's health or sexual orientation. Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. PROTECTED CLASSIFICATION CHARACTERISTICS UNDER CALIFORNIA OR FEDERAL LAW.	Information concerning enquiries and bookings made with or through us for travel services, including where you are making the enquiry or	YES
E. COMMERCIAL INFORMATION.		

booking or are the recipient of the travel services to which the enquiry or booking relates. Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, records of enquiries and searches for holiday and travel products made by or on your behalf, details of your personal interests, needs and other data relevant to your enquiry; details of results, quotes, proposals, estimates and other information given in response to enquiries; details of the holiday, accommodation, travel, car hire, and other travel services booked or enquired about; details of the passengers / holidaymakers travelling; details of the provider of the travel services (e.g. tour operator); dates and times of travel; price; payment details (including card details); passport information and visa information; foreign exchange requirements and arrangements; and sensitive information such as health, medical, dietary, mobility, disability, religious or other special conditions or requirements.

F. INTERNET OR OTHER SIMILAR NETWORK ACTIVITY.

Browsing history, search history, information on a consumer's interaction with a website,

YES

application, or  
advertisement.

Information generated  
concerning the  
performance of any  
booking or other contract  
made with or through us,  
including information  
relating to anything  
arising during any holiday  
or other travel services,  
and information relating to  
payments to be made.

Information collected or  
generated out of any  
surveys we conduct.

Information collected or  
generated out of any  
competitions or  
promotions we run.

Information concerning  
any accounts,  
registrations, or  
memberships with us, or  
participation in any  
loyalty program.

Correspondence,  
communications and  
messages, including  
between you and us, and  
between us and third  
parties, including relating  
to any booking or booking  
enquiry, or performance  
of any contract.

We may collect  
information about your  
visits to, browsing of, and  
use of our website, unless  
your web browser blocks  
this. The range of  
information we collect  
will depend on how you  
interact with our website.

This information may include: your IP address (a unique identifier allocated to your computer for your connection to the internet); your computer device details (PC, tablet, smartphone, watch etc.); the make and version of web browser (e.g. Internet Explorer, Firefox, Safari, Opera, Chrome) you are using; your operating system (e.g. Windows, Windows Phone, OSX, iOS, Android, Linux etc.); your time-zone; your browser plug-ins; any web-page you came from, identified as the referrer web page address by your web browser; cookies; page response times; download error; pages and parts of pages you visit; usage you make of our website, including enquiries and searches undertaken, and registrations for accounts, forums etc.; services and products you viewed; length of visit to website and pages; page interaction information (such as scrolling, keys pressed, mouse clicks, touches, and mouse-overs). This will normally be collected and used anonymously and aggregated for analysis, with your name and any characteristics identifying you remaining anonymous, but our privacy policy will apply, and it will be treated as your personal information

if this information is in any way linked to you personally. This information may also include: information inputted into forms and fields; registrations for any accounts, forum, feedback mechanism, social functionality, newsletters or other features of our site; usernames and passwords, log-in/out history, and settings; actions taken within any account or other registration, including view and update and changes to settings; and posts to any forum, feedback, review or other social functionality on our website.

#### **4. INFORMATION WE COLLECT**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA/CPRA's scope, like:
  - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

#### **5. HOW WE COLLECT OR GENERATE YOUR PERSONAL INFORMATION**



This section sets out the ways in which we may collect or generate personal information concerning you. We obtain categories of personal information listed above from the following categories of sources:

### **5.1 Visiting our website**

By visiting and using our website, you or your computer may provide personal information. This includes: information which is automatically provided by your browser to our servers; information recorded on our web servers about your interaction with our website and pages viewed; information we capture or place on your computer or generate using cookies or other technologies on our website; and information you input into forms and fields on our website.

### **5.2 Data you provide**

Your personal information will include information you provide (or later amend), whether: from correspondence with you; verbally to us over the phone or in person; by filling in any field or form on a website; by posting on our social media channel; by posting on any forum referencing us; by filling in any printed form we provide you; by email; from documents you provide us; and from updates to any information you provide from time to time. This includes when you: register for or subscribe to any service, account, members or loyalty program, or make an enquiry or booking for a vacation or other travel services whether in person, by phone, through our website, or otherwise; send us your comments or suggestions; subscribe to any newsletter or other publication; and request sales and advertising information, including brochures.

If you do not provide us with your personal information, we will be unable to provide you with information or book travel services for or on your behalf.

### **5.3 USER-GENERATED CONTENT (UGC)**

We may process information or content provided by you in relation to your feedback or experience on a past, current, or future trip with us. We will only use such content and images you have submitted to our social media channels or websites if you have given consent to let Evan Evans Tours Ltd. and The Travel Corporation (TTC) subsidiary companies to process this information in various initiatives. These could include any marketing activities such as:

Print materials; on our website; email activities; social posts; images of our trips; images provided to our trade partners to use on their websites, email marketing and other marketing initiatives; UGC made available in our content feeds—we would share imagery in our content feeds, image repositories, via email, and share with our trade partners via these methods; any other information provided to us by or in relation to you which concerns you as an individual.

### **5.4 Data obtained from third parties**

We may obtain personal information concerning you from third parties, including from: people making enquiries or bookings on your behalf; providers of any vacations, holidays, accommodation, or other travel services which are enquired about or booked, and their intermediaries; credit, fraud, identity, and other searches we may undertake, including searches with public records and regulatory and private organizations; from any business or

organization you are associated with; from telephone numbers identified by the telephone system when you telephone us.

Under the CCPA/CPRA, Evan Evans Tours Ltd. ensures it will take any reasonable and appropriate steps to ensure that the third-party service provider, or contractor provides the level of privacy protection required by the CCPA/CPRA. The service provider will only use the personal information transferred in a manner consistent with the CCPA/CPRA. If the service provider is unable to meet these requirements, Evan Evans Tours Ltd. will be notified by the such service provider and take appropriate actions to protect your data in accordance with the CCPA/CPRA.

## 5.5 Cookies

A cookie is a small text file that is stored on a computer for record-keeping purposes. Our third-party analytics providers use cookies to record information about your activities on the Site and to “remember” you when you return to the Site. Some cookies remain on your computer until you delete them. Others, like session ID cookies, expire when you close your browser. We do not control the use of cookies by third parties. We typically use the following types of cookies :

- **Session cookies:** temporary cookies that identify and track users within our website. These are automatically deleted by your browser when you close your browser or end the session; and
- **Persistent cookies:** cookies which enable our website to ‘remember’ who you are and your preferences within our website. These cookies are stored in your browser (the specific location depends on the browser and version) for a period of time.

Cookie	Domain	Description	Duration	Type
AWSALB	evanevanstours.com	AWSALB is an application load balancer cookie set by Amazon Web Services to map the session to the target.	7 days	Performance
AWSALBCORS	evanevanstours.com	Amazon Web Services set this cookie for load balancing.	7 days	Necessary
_ga_*	.evanevanstours.com	Google Analytics sets this cookie to store and count page views.	1 year 1 month 4 days	Analytics
_ga	.evanevanstours.com	Google Analytics sets this cookie to calculate	1 year 1 month 4 days	Analytics

		visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.		
_gid	.evanevanstours.com	Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.	1 day	Analytics
_dc_gtm_UA-179875-1	.evanevanstours.com	No description	1 minute	Other
__lc_cid	.accounts.livechatinc.com	This is an essential cookie for the website live chat box to function properly.	1 year 1 month 4 days	Functional
__lc_cst	.accounts.livechatinc.com	This cookie is used for the website live chat box to function properly.	1 year 1 month 4 days	Functional

__oauth_redirect_detector	accounts.livechatinc.com	This cookie is used to recognize the visitors using live chat at different times in order to optimize the chat-box functionality.	less than a minute	Functional
---------------------------	--------------------------	---	--------------------	------------

Please see Evan Evans Tours Ltd. [Cookie Policy](#) for more details and a list of the cookies used by our website.

## 5.6 Data generated by us

We and any suppliers or sub-contractors working for us may generate personal information relating to you, including in connection with responding to and dealing with any enquiry, booking, or complaint; or in performing any booking or other contract with you; or through the analysis of your personal information or information gained from your use of our website. We may record telephone calls with you.

## 6. WHAT DO WE USE YOUR PERSONAL INFORMATION FOR

We commit to use your personal information only for the purposes listed below and for as long as it is necessary to achieve these purposes.

### 6.1 Operate our website

To operate and provide the search, booking, accounts, review, forums, and other services, facilities, and functions of our websites. This includes customizing your online experience by providing you with more relevant online offers and updates, managing any accounts or registrations you have with our websites, and making changes to your settings and profile at your request.

### 6.2 Provide information and respond to enquiries

To provide information to you about our website, systems, and services, including responding to booking enquiries and searches for vacations and travel, and to keep you updated generally.

### 6.3 Bookings and other contracts

To enable you to make bookings, and to fulfill, provide, perform, administer, manage, and enforce all bookings, orders, and other contracts which relate to you (including if you are a passenger in a booking made by someone else), and to process any transactions authorized or made with us which relate to you.

### 6.4 Payments

To collect and make payments due and administer our accounts.

## **6.5 Communication with customers**

To communicate with you concerning any enquiries, bookings, travel services provided, problems, and complaints, and to respond to any submissions, enquiries, or requests from you.

## **6.6 Record keeping**

To keep internal records and maintain reasonable archives, including concerning as to enquiries, bookings, contracts, travel services, and complaints.

## **6.7 Manage and improve your business**

To analyze, audit, provide, operate, administer, maintain, and improve our business, website, systems, and services; to carry out surveys and analyze the results; to run promotions and competitions;

To undertake product or customer research/development; to assist us in and help us to improve our sales, editorial, advertising, and marketing processes, including by sharing of photographs which you have voluntarily participated in during our Trips. Such photos may be shared across our social media channels, such as Facebook, Instagram, Twitter, or LinkedIn. These images will not be shared for any use other than to promote our travel experiences. Please remove yourself from group photos organized by Trip Directors if you do not wish to be photographed;

To carry out other business development and improvement activities; and to provide training to our staff, sub-contractors, and suppliers. For example, we may use your personal information to help us profile how our customers generally are using our websites and booking travel services with (or through) us. We may also use this information to ascertain interests so that we can better tailor our business offerings.

## **6.8 Direct Marketing**

To carry out direct marketing to you, in particular, to identify you as a customer and to identify your product and service preferences and to provide personalized content and ads informing you of new or additional products, services, and/or promotions that may be of interest to you. We may engage in direct marketing via the following means depending on the details you have provided to us: text messages, phone calls, targeting you on social media platforms on your personal computer and mobile device, direct mail, post, web advertising, in third-party apps, in our apps. See Section 7 for the types of products we may market to you this way.

## **6.9 Advertising**

To report aggregate information concerning usage of our websites to our advertisers. We normally create anonymous statistical data about browsing actions and patterns, and do not identify any individual.

## **6.10 Advertising**

For any purpose for which we have obtained your consent.

## **7. USE OF YOUR PERSONAL INFORMATION FOR DIRECT MARKETING**

As a part of our commitment to your privacy, Evan Evans Tours Ltd. supports and adheres to the guidelines and best practices adopted by the Direct Marketing Association's "Privacy Promise to American Consumers." We have agreed to (1) honor customers' requests not to share their data with other marketers; and (2) honor customers' requests not to receive mail, telephone, or other solicitations from Evan Evans Tours Ltd.

We may use your personal data to carry out direct marketing and send you marketing messages, materials, advertisements, and promotions relating to travel services we provide or which can be booked with third parties through us.

We may also use your personal data to carry out direct marketing and send you marketing messages, materials, advertisements, and promotions relating to travel services which are offered by or which can be booked through any other company in the same group of companies as us (i.e. within The Travel Corporation group) or third parties selected by us.

You will be free to withdraw your consent to this at any time, by contacting us by phone at (800) 257-2407 or by email at [compliance@ttc.com](mailto:compliance@ttc.com).

### **7.1 Direct Marketing by us**

We may use your personal information to carry out direct marketing and send you marketing messages, materials, advertisements, and promotions relating to travel services that we provide or which can be booked with third parties through us.

We may also use your personal information to carry out direct marketing and send you marketing messages, materials, advertisements, and promotions relating to travel services which are offered by or which can be booked through any other company in the same group of companies as Evan Evans Tours Ltd. and The Travel Corporation (TTC), or third parties selected by us. We may also collect your contact information through the use of cookies and pixels on our websites and may share this information with trusted third-party partners to send you relevant marketing communications, including via direct mail.

You will be free to withdraw your consent to this at any time, by contacting us as detailed in this Privacy Policy or as detailed in any direct marketing that you receive or by clicking the 'unsubscribe' button or text link at the bottom of any of our emails. In any unsubscribe request you send us via email, we ask that you insert 'unsubscribe' as the subject heading.

### **7.2 Direct Marketing by third parties**

We may disclose your personal information that is contact information (such as name, email, postal address, telephone, mobile, or fax number) to any other company in the same group of companies as Evan Evans Tours Ltd. and The Travel Corporation (TTC), or to third parties selected by us. They will use this to carry out direct marketing in their own right and will use

it to send you marketing materials, advertisements, and promotions relating to products and services they offer or which can be booked through them. You will be free to withdraw your consent to our disclosure of your personal information for this purpose at any time, by contacting us as detailed above. If you withdraw your consent, this will not affect any disclosures we have already made (i.e. we will not be able to remove your personal information from anyone we have disclosed it to), but we will tell you who they are upon request, and you should contact them directly concerning this.

## **8. INFORMATION RETENTION**

We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We dispose of the information we collect in accordance with retention policies and procedures. However, if we need to retain your data for analytics purposes or trend analysis, we will anonymize and de-identify your personal information. If you would like to know more about our data retention policy, please ask us.

## **9. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and to not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

1. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
2. Protected classification characteristics under California or federal law.
3. Commercial information.
4. Internet or other similar network activity.
5. Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have sold personal information for direct marketing purposes.

We transfer your personal information to third parties in the following circumstances:

### **9.1 Credit checks**

We may disclose your personal information to third parties (including intermediaries) as necessary to carry out any checks concerning you or enforce any booking or contract with you (including credit, security, fraud, and identity checks). This may include credit reference agencies and other companies for use in credit decisions, for fraud prevention, and to pursue debtors.

## **9.2 Bookings and performance of contracts**

We disclose your personal information to third parties (including intermediaries) as necessary to deal with any booking enquiry being made by or for you, to make any booking requested by or for you, to perform and administer any booking for you or other contract with or in respect of you. This may include: to apply for visas on your behalf, to collect payments to be made by you, to investigate and respond to complaints, and to enforce any booking or other contract with you. Such third parties may include any suppliers or sub-contractors and their agents (e.g. airlines, coach, ferry or train companies, hoteliers, hire companies, cruise companies, tour operators etc.).

## **9.3 Suppliers of travel and other services**

We may disclose your personal information to any third party (e.g. supplier, contractor, sub-contractor) to whom we make any enquiries with concerning or engage or sub-contract to perform any booking or other contract, including to provide any travel, tour, or other products or services we have agreed to provide to you. We may disclose your personal information to any supplier with whom we make any enquiry concerning or book any travel or other products and services for you as agent (whether as agent for you, someone representing you, or the supplier), such as a tour operator. Details of any third-party tour operators or other third parties who will be responsible for or supply you with the travel services booked or enquired about, may be obtained from us on request, and may be stated in any tour or other brochure provided by us.

## **9.4 Insurance**

If any application is made through us for any travel or other insurance coverage for you, we will pass your personal information on to the insurer. Information provided by you may be put onto a register of claims and shared with other insurers to prevent fraudulent claims.

## **9.5 Business function outsourcing**

Where we use third parties to host, provide, operate, or supply any part of our websites, databases, systems, business, or services, or to carry out on our behalf any of our business functions or actions (including sending mail, processing payments, providing marketing assistance, providing customer and advertising analysis through third-party ad-tech vendors, and providing customer services), then we may provide your personal information to them as required for use for or processing as part of those purposes.

## **9.6 Public forums, etc.**

Where any facility on our website is clearly designed to make certain of your personal information public (e.g. posts you make to any public forum or reviews facility), then any personal information you provide in relation to that forum or other facility, which is provided



in circumstance where it is clear that it is intended to be published, will be disclosed to the public accordingly, subject to moderation by us.

## **9.7 Legal requirements**

We may supply personal information to a government authority or regulator where required to comply with a legal requirement, for the administration of justice, for the purposes of customs, visas, and immigration, or where reasonably required to protect your vital interests or enforce any booking or other contract. We may disclose your personal information where otherwise required by or permitted by law.

## **9.8 Direct Marketing by third parties**

We may disclose your personal information to third parties to carry out direct marketing to you. See the direct marketing section above.

## **9.9 Customer representatives**

If our customer is a business or organization, and we are holding your personal information in your capacity as an associate of that business or organization (including as agent, representative, contact, employee, officer, owner, partner, or director), then we may disclose to them that personal information. If our customer is making a booking or booking enquiry on your behalf, with your authority, then we may disclose to our customer your personal information as reasonably required in connection with such booking or enquiry, or the subsequent performance of or payment for any booking made.

## **9.10 Business Acquirers**

If our business is ever transferred to a third party, then your personal information will be transferred to the acquirer to enable them to continue our business.

# **10. YOUR RIGHTS AND CHOICES**

The CCPA/CPRA provides California residents with specific rights regarding their personal information. This section describes your CCPA/CPRA rights and explains how to exercise those rights.

## **10.1 REQUEST INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA AND ACCESS IT**

This enables you to receive information on the processing of your personal data and a copy of personal information we hold about you in a commonly used format. This applies to information we have processed over the last 12 months.

## **10.2 REQUEST RECTIFICATION OF YOUR PERSONAL INFORMATION**

This enables you to correct and rectify inaccurate data that may be held about you. You can also request Evan Evans Tours Ltd. to complete any incomplete data, or to record a supplementary statement.

### **10.3 REQUEST DELETION OF YOUR PERSONAL INFORMATION**

This enables you to ask us to delete personal data where there is no good reason for us to keep it, unless the law allows us to. This applies to information we have processed over the last 12 months.

### **10.4 REQUEST INFORMATION ABOUT THE PROCESSING OF YOUR PERSONAL DATA IN RELATION TO OUR DATA SELLING AND DISCLOSURE PRACTICES**

This enables you to receive information on the personal data we have collected about you and shared with our service providers. You are also entitled to know which of your personal information has been sold and to whom. If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt-out”). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt-in”) from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt out of future sales at any time. You can manage your communication preferences at any time from your account or by contacting Evan Evans Tours Ltd. You (or your authorized representative) may also exercise the right to opt-out by submitting a request to us by visiting the following page: <https://ttc.com/privacy-policy/us/usa-personal-data-request-us/>, or sending us an email at [compliance@ttc.com](mailto:compliance@ttc.com).

### **10.5 REQUEST INFORMATION ON THE DISCLOSURE OF PERSONAL DATA FOR DIRECT MARKETING PURPOSES**

This enables you to receive information on the third parties to whom we have disclosed your information and the categories of disclosed personal data, which has been shared for direct marketing purposes.

### **10.6 REQUEST TO OPT-OUT OF SHARING YOUR SHARING PERSONAL INFORMATION WHETHER OR NOT MONEY OR SERVICE IS EXCHANGED AS A RESULT OF YOU SHARING THIS INFORMATION**

Opt-out requests specifically to email direct marketing must be fulfilled within ten business days of receiving the request as, per the CAN-SPAM Act. No further direct marketing emails should be sent after this time.

### **10.7 REQUEST TO OPT-OUT FROM THE SALE OF PERSONAL DATA TO OTHER COMPANIES**

This enables you to cease any selling of your personal information. Please note that we are not engaged in selling any of your personal information to other companies. You can opt-out to any sale of your personal data through the following link: [Do Not Sell My Personal Information](#).

### **10.8 REQUEST NOT TO BE SUBJECT TO DECISIONS BASED SOLELY ON AUTOMATED PROCESSING (INCLUDING PROFILING)**

This enables you to cease being subject to processing based on automated processing. If the decision produces legal effects concerning you or similarly significantly affects you, Evan Evans Tours Ltd. shall make all attempts not to conduct automated decision-making. However, if such automated decision making occurs, you will be allowed to opt-out in accordance with the CCPA/CPRA.

## **10.9 NOT TO BE DISCRIMINATED AS OUR CONSUMER WHEN YOU EXERCISE ANY OF THE AFOREMENTIONED RIGHTS**

This means that, in an event of any of your requests to us, we will not engage in or suggest any discrimination against you. In particular, we will not deny our services to you, we will not charge you differently, and we will not provide a different level or quality of services to you, unless such difference is reasonably related to the value provided to you or you have agreed to enter into a financial incentives program with us.

## **10.10 CONSUMERS' RIGHT TO LIMIT USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION**

This enables you to direct Evan Evans Tours Ltd. to limit its use of any Sensitive Personal Information that you may have provided. We will not discriminate against you for exercising your rights. We will not deny you services, charge different prices or rates, or provide a different level of service. Some services require the usage of personal information to function, so compliance with your request may impact those experiences.

## **10.11 EXERCISING YOUR RIGHTS**

To exercise any of the privacy rights described above, please submit a verifiable request to us by either:

- Email to [compliance@ttc.com](mailto:compliance@ttc.com).
- Telephone on 1300 228 546.
- Post to Evan Evans Tours LTD., 258 Vauxhall Bridge Road, SW1V 1BS, LONDON, UNITED KINGDOM

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an

account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## **10.12 RESPONSE TIMING AND FORMAT**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **10.13 NON-DISCRIMINATION**

We will not discriminate against you for exercising any of your CCPA/CPRA rights. Unless permitted by the CCPA/CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **10.14 COMPENSATION**

You have the right to claim compensation for damage and (in certain cases) distress you suffer if we do not comply with the laws referred to above.

## **10.15 COMPLAINTS TO APPLICABLE AUTHORITY**

The laws we comply with are regulated by the US Department of Consumer Affairs. In addition to your rights above, it is open to you, if you have a complaint or concern, to seek assistance from such government regulator, who has power to compel us to comply with applicable laws and fine us for non-compliance. However, before you do so, we would hope that you will contact us first to discuss any complaints or concerns you have.

## **11. HOW THIRD PARTIES WILL HANDLE YOUR PERSONAL INFORMATION**

Where we provide your personal information to a third party, one of the following two circumstances will apply:

## **11.1 PROCESSING ON OUR BEHALF**

In some cases, your personal information may be held and otherwise collected and used by them on our behalf, in which case we will remain responsible for what they do with your personal information, and your personal information will only be held and collected and used by them in accordance with our instructions and this Privacy Policy.

## **11.2 PROCESSING ON THEIR OWN ACCOUNT**

In other cases, your personal information may need to be provided to them to be held and processed by them in their own right and on their own account. In such case, they will have their own responsibility for that personal information, subject to their own privacy policy, and we will not be responsible for what they do with it following disclosure.

## **12. LOCATION OF YOUR PERSONAL INFORMATION**

### **12.1 TRANSFER OF PERSONAL INFORMATION OVERSEAS**

We (and any affiliate, subcontractor or other person processing your personal information on our behalf) may transfer, store and otherwise process your personal information anywhere in the world to fulfill the purposes set out in this policy, for example to: (1) our overseas offices; (2) information processors (including operators of global travel distribution systems); (3) airlines, hotels, and other travel service products; and (4) information technology and business service providers.

In many cases, the transfer is necessary to initiate or complete a booking or other transaction on your behalf in response to a request by you or for the purpose of entering a contract with a third party on your behalf.

Where we disclose your personal information to third parties, that disclosure may also involve a transfer of your personal information anywhere in the world, and those third parties may themselves transfer, store, or otherwise process that information anywhere in the world.

In each case, we will comply with any legal requirements concerning the transfer of your personal information by us to any third party outside the country where we are established, and where your personal information is still controlled by us or is being stored or otherwise processed on our behalf, our security measures (as detailed below) will also apply.

### **12.2 COUNTRIES TO WHICH YOUR PERSONAL INFORMATION IS TRANSFERRED**

The countries to which we transfer your personal information depend on your booking. Generally, such countries include those in Asia Pacific, Africa, North and South America, and Europe.

## **13. KEEPING YOUR DATA SECURE**

### **13.1 OUR SECURITY MEASURES**

#### **13.1.1 OUR GENERAL COMMITMENT**

We are committed to doing what we reasonably can to keep your personal information secure, and we are obliged by law to put in place appropriate technical and organizational measures against unauthorized or unlawful processing of your personal information and against accidental loss or destruction of, or damage to, your personal information. We have accordingly implemented security policies, rules, and technical measures with a view to achieving this.

### **13.1.2 TRANSMISSIONS BETWEEN YOUR WEB BROWSER AND OUR SERVERS**

We use Secure Sockets Layer (“SSL”) software in order to encrypt the personal information that you provide to us while it is in transit over the internet. This will work if your browser is SSL enabled (which most are). You can verify that this is working by looking for the symbol of a closed lock or solid key in the browser address bar or on the bottom bar of your browser window and by checking that the prefix for the web address in the browser address bar has changed from “http” to “https.”

### **13.1.3 STORAGE OF YOUR PERSONAL INFORMATION**

The personal information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology, and other reasonable security measures.

## **13.2 YOUR SECURITY MEASURES**

For your own privacy protection, we encourage you to maintain anti-virus and other malware protection software on your computers and other devices, and to maintain your own measures to protect your personal information. Please do not include sensitive personal information in any emails you may send to us, including payment card information.

We also encourage you to be careful about who you give personal information to. We never contact you to ask you for sensitive personal information, such as payment card information, or sensitive personal information such as passport numbers or log-in details, and we will only ask you for such information in person or through our website, or by telephone in connection with a booking you are making or have made. Please let us know if you someone purports to contact you in our name.

## **14. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?**

We keep your personal information for as long as is reasonably necessary for the purposes for which we use it, and if longer, for any duration required by law, and for statutory claims limitation periods where your personal information may be relevant to any possible liability we may have to you.

## **15. “DO NOT TRACK”**

We are required to let you know how we respond to web browser Do Not Track (DNT) signals.

We do not respond to such signals at this time.

## **16. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to amend this Privacy Policy at our discretion and at any time without notice to you, including by publishing a new version on our website. You can check the top of the document to see the date of the latest version in force. Any change will be prospective only, and we will not make any changes that have retroactive effect unless legally required to do so.

## **17. CONTACTING US**

If you have any questions about our privacy policy or about how we process your personal information, including any requests, queries of complaints, please contact us either by:

- Email to [compliance@ttc.com](mailto:compliance@ttc.com).
- Telephone on 1300 228 546.
- Post to Evan Evans Tours LTD., 258 Vauxhall Bridge Road, SW1V 1BS, LONDON, UNITED KINGDOM

## **18. COPYRIGHT NOTICE**

This document, and all content of our websites is Copyright © 2023 Evan Evans Tours Ltd. ALL RIGHTS RESERVED.

## **19. ENFORCEMENT**

Our privacy policy is subject to the law of the state of California, County of Orange, and disputes can be determined by the courts of the state of California, County of Orange. The CCPA/CPRA is enforced by the California Privacy Protection Agency for enforcement and guidance. As the data subject, you have a private right of action for breach of information.