

# LION WORLD TRAVEL LIMITED PRIVACY POLICY

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## 1. ABOUT THIS POLICY

This is the Privacy Policy of The Travel Corporation are incorporated under the laws of Guernsey, Channel Islands. Our incorporation number is 50768 and our incorporation address or registered office is Travel House, Rue du Manoir, St Peter Port, Guernsey, GY1 2JH, Channel Islands. This document (our “privacy policy”) sets out information into how we use personal information relating to people we interact with including, for example, customers and website users. It serves as an expression of our commitment to protecting your personal information. It is important that you read this privacy policy together with any other privacy notices we may provide you on all occasions of personal information collection and processing, so you are fully aware of how and why we are using your information. This privacy notice supplements other notices and is not intended to override them. We collect, use, and disclose your personal information in accordance with applicable Canadian privacy requirements, including the Personal Information Protection and Electronic Documents Act (PIPEDA).

## 2. OUR COMMITMENT

We respect your right to privacy, and we aim to ensure 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 your personal information.

### 3. OUR LEGAL BASIS FOR PROCESSIN

We will process your personal information in accordance with all applicable laws and applicable contractual obligations. More specifically, we will not process personal information unless at least one of the following requirements are met

- You have given consent to the processing of your personal information for one or more specific purposes;
- The processing is necessary for the performance of a contract to which you are party (for instance, for booking you have made) or in order to take steps at your request prior to entering into a contract (for instance, when you request a quote from us)
- Processing is necessary for compliance with a legal obligation to which we are subject (for instance, for visa applications);
- Processing is necessary in order to protect your vital interests or of any other individual (for instance, if you have any issue during a trip);
- Processing is necessary for the reasonable purposes of the business activity pursued by us or by a third party Please find below an indicative, non-exhaustive list of processing activities.

#### PROCESSING ACTIVITY REASONABLE PURPOSE

<b><i>PROCESSING ACTIVITY</i></b>	<b><i>REASONABLE PURPOSE</i></b>
DIRECT MARKETING ACTIVITIES INCLUDING TRACKING, PROFILING, SEGMENTATION, AND COMMUNICATION ACROSS MULTIPLE CHANNELS, SEE SECTION 8.8	Promoting relevant services and products based on your relationship and interaction with us
RECORD KEEPING AND REPORTING, SEE SECTION 8.6	Understanding and improving our business
STATISTICAL ANALYSIS OF CUSTOMER INFORMATION, SEE SECTION 8.7 & 8.9	Understanding and responding to customer behaviour and preferences
PROVISION OF CUSTOMER INFORMATION TO INSURANCE PROVIDERS, BORDER AUTHORITIES & OTHER LAW	Protecting and maintaining the safety of our guests and employees; legitimate interest in taking

ENFORCEMENT AGENCIES, SEE SECTION 11.4 & 11.7	appropriate legal action in case of disputes
PROCESSING OF GUEST PREFERENCES AND OTHER INFORMATION VOLUNTEERED BY THE GUEST PRIOR TO A TRIP, SEE SECTION 8.3	Personalizing and improving the delivery of our services and products
PROCESSING OF CUSTOMER INFORMATION AS PART OF PRIZE DRAWS, COMPETITIONS, SWEEPSTAKES, AND SURVEYS, SEE SECTION 6.4 & 6.5	Engaging with our customers and promoting our products
PROCESSING OF CUSTOMER INFORMATION IN THE COURSE OF ADMINISTRATION AND MAINTENANCE OF OUR WEBSITES AND SYSTEMS, SEE SECTION 6.8 & 8.7	Running our business and improving our systems

#### 4. CHANGE OF PURPOSE

We will only use your personal information for the purpose for which we obtained it. If we reasonably need to re-purpose your personal information, we will ensure it is for a reason that is compatible with the original purpose. If you require an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. We may process your personal information for other reasonable purposes.

- There are some circumstances in which personal information may be processed for purposes that go beyond the original purpose for which the personal information was collected. When this is susceptible to be the case, we will make our best efforts to tell you in advance and request your consent when appropriate.

- For circumstances where we may have other secondary purposes, for processing already existing information which you have provided as part of a contract for example, booking information. The objective of further processing may include conducting marketing insights and data analysis to have a better understanding of our customers.

- We will adopt an aggregate data model that allows us to derive aggregated data from your personal information. Aggregated data is not considered personal data by law, as you will not be directly or indirectly identified. For example we may make use of aggregated data to see performance statistics of our travel consortia/consultants and to gain insights into customer demographics for improving marketing and customer service.

- However, if we combine or connect aggregated data with your personal data so that it directly or indirectly identifies you, we shall treat the combined data as personal information which will be processed as required under applicable Canadian law.

## 5. WHO OUR PRIVACY POLICY COVERS

### 5.1 Who this policy covers

Our privacy policy sets out how we process personal information relating to the following entities who are:

- individuals booking or enquiring about booking travel services with or through us; or
- 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);
- customers or potential customers or recipients of travel services that can be booked with or through us.
- a business or organisation, employees or individuals who are acting as representatives of that business or other organisation, and individuals connected to that business or other organisation, such as owners, partners, shareholders, and directors;
- (4) individuals whose personal information is obtained 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).

We understand personal information as any information relating to an identified or identifiable individual, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, services obtained or considered, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

### 5.2 When we are information processor only

Please however note that 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 and its privacy policy, who will be answerable for how we process that personal information on their instructions.

### 5.3 Terms used in this policy

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

When we refer to "processing" of your personal information, this includes obtaining, recording, storing or holding your personal information, and anything we do with it, such as organising, 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, transport and transfers (whether by air, coach, bus, train, ferry, taxi or other means), car hire, cruises, and charters,

and it includes both:

- (1) all such products and services which we supply or operate ourselves (including where we sub-contract); and
- (2) any such products and services provide by a third party which we book for you (acting as agent for you or that third party). Travel services also includes any services we or a third party provide in association with travel, such as obtaining visas, foreign exchange, and providing local representatives and support.

## **6. WHAT TYPES OF PERSONAL INFORMATION WE MAY PROCESS**

This section summarises the types of personal information about you that we process:

### **6.1 Information concerning you as an individual**

We may collect the following:

- name,
- age,
- gender,
- address,
- telephone,
- mobile,
- fax,
- e-mail,
- Social networking contact details, your social posts about any of our trips and travel experiences.
- photographs,
- proofs of identity and address, copies of passports, driving licences, 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 programme affiliation and member number.

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. In any e-mail you send we would ask you to insert "unsubscribe" as the subject heading.

### **6.2 Business Related Information**

If you are an individual associated with a business or other organisation that is our customer, then your personal information may include the following information that we link to you:

- business or organisation details (such as name, address, telephone numbers, payment arrangements, financial information, etc.),
- your relationship with that business or organisation (such as owner, partner, director, shareholder, employee, or agent), and
- your contact details within that business (such as work address, work telephone and mobile numbers, work fax number, and work e-mail address).

### **6.3 Enquiry and Booking information**

Information concerning enquiries and bookings made with or through us for travel services, including where you are making the enquiry or booking or are the recipient of the travel services to which the enquiry or booking relates. This information may include:

- records of enquiries and searches for holiday and travel products made by or on your behalf,
- details of your personal interests,
- needs and other information 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, or other requirements relevant to the service you are enquiring about or your contract with us.

### **6.4 Survey Information**

Information collected or generated out of any surveys we conduct.

### **6.5 Competition Information**

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

### **6.6 Account, Registration and Loyalty Information**

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

### **6.7 Correspondence**

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

### **6.8 Website Usage Information**

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 (as per our [cookie policy](#));
- identifiers assigned to you by third-party advertising providers and web beacons you interact with;
- 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.

Such information will be treated as personal information and processed according to this privacy policy.

## **7. 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.

### **7.1 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. This is more detailed in our [cookie policy](#).

## **7.2 Information you provide**

Your personal information will include data you provide (or later amend), whether:

- from correspondence with you;
- verbally to us over the phone or in person;
- by filing in any field or form on a website;
- by filling in any printed form we provide you with;
- by e-mail;
- from documents you provide us with; and
- from updates to any information you provide to us from time to time.

This includes when you:

- register or subscribe for any service, account, members, or loyalty program,
- make an enquiry or booking for a holiday 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.

## **7.3 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 [Brand Name] and 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 on our trips
- provide images to our trade partners to use on their websites, email marketing and other marketing initiatives
- make 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.

## **7.4 Information obtained from third parties**

We may obtain personal information concerning you from third parties, including from:

- providers of any holidays, accommodation, 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 organisations;
- Any business or organisation you are associated with; from telephone numbers identified by the telephone system when you telephone us.

## **7.5 Information 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 according to our cookie policy.

We may record telephone calls with you for training and quality purposes.

## 7.6 Cookies

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.

### Necessary

Cookie Name	Provider	Type	Expiry
CONSENT	youtube.com	HTTP	6098 days
COOKIECONSENT	lionworldtravel.com	HTTP	1 year
GUID	steelhousemedia.com	HTTP	3 years
HAS_JS	lionworldtravel.com	HTTP	Session
RC::A	google.com	HTML	Persistent
RC::C	google.com	HTML	Session
TT	steelhousemedia.com	HTTP	3 years

### Statistics

Cookie Name	Provider	Type	Expiry
AT.HIST.#	lionworldtravel.com	HTML	Persistent
_GA	lionworldtravel.com	HTTP	2 years
_GAT	lionworldtravel.com	HTTP	1 day
_GID	lionworldtravel.com	HTTP	1 day
P.GIF	typekit.net	Pixel	Session
VUID	vimeo.com	HTTP	2 Years

### Marketing

Cookie Name	Provider	Type	Expiry
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__ATUVC	lionworldtravel.com	HTTP	1 year
__ATUVS	lionworldtravel.com	HTTP	1 day
_AT.CWW	lionworldtravel.com	HTML	Persistent
_FBP	lionworldtravel.com	HTTP	3 months
_GCL_AU	lionworldtravel.com	HTTP	3 months
ADS/GA-AUDIENCES	google.com	HPixel	Session
AT-RAND	lionworldtravel.com	HTML	Persistent
FR	facebook.com	HTTP	3 months
IDE	doubleclick.net	HTTP	1 year
LOC	addthis.com	HTTP	1 year
PAGEAD/1P-USER-LIST/#	google.com	Pixel	Session
PAGEAD/LANDING	doubleclick.net	Pixel	Session
PAGEAD/LANDING	google.com	Pixel	Session
RUL	doubleclick.net	HTTP	1 year
TEST_COOKIE	doubleclick.net	HTTP	1 year
TR	facebook.com	Pixel	Session
UVC	addthis.com	HTTP	1 year
VISITOR_INFO1_LIVE	youtube.com	HTTP	179 days
XTC	addthis.com	HTTP	1 year
YSC	youtube.com	HTTP	Session
YT.INNERTUBE::NEXTID	youtube.com	HTML	Persistent
YT.INNERTUBE::REQUESTS	youtube.com	HTML	Persistent
YT-REMOTE-CAST-INSTALLED	youtube.com	HTML	Session
YT-REMOTE-CONNECTED-DEVICES	youtube.com	HTML	Persistent
YT-REMOTE-DEVICE-ID	youtube.com	HTML	Persistent
YT-REMOTE-FAST-CHECK-PERIOD	youtube.com	HTML	Session
YT-REMOTE-SESSION-APP	youtube.com	HTML	Session
YT-REMOTE-SESSION-NAME	youtube.com	HTML	Session

## 8. WHAT DO WE USE YOUR PERSONAL INFORMATION FOR?

This section sets out the uses which we make of your personal information and the legal basis on which we rely to do this.

### 8.1 Operate our website

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

### 8.2 Provide information and respond to enquiries

To provide information to you about our website, systems, and services, including to respond to booking enquiries and searches for holidays and travel, and to keep you updated generally. We process your information because you ask us to take the relevant steps in order to enter into a contract, or because we perform a service that you asked us to provide.

### **8.3 Bookings and other contracts**

To enable you to make bookings, and to fulfil, 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 authorised or made with us which relate to you. We process your information because you ask us to take the relevant steps in order to enter into a contract, or because we perform a service that you asked us to provide.

### **8.4 Payments**

To collect and make payments due and administer our accounts. This is necessary for the preparation of any contract between us.

### **8.5 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. We process your information because you ask us to take the relevant steps in order to enter into a contract, or because we perform a service that you asked us to provide.

### **8.6 Record Keeping**

To keep internal records and maintain reasonable archives, including concerning as to enquiries, bookings, contracts, travel services, and complaints. This is done on the basis of our legitimate interests in ensuring our business is protected or run efficiently, or because we have the legal obligation to do so.

### **8.7 Manage and improve our business**

To analyse, audit, provide, operate, administer, maintain and improve our business, website, systems, and services;

- to carry out surveys and analyse the results;
- to run promotions and competitions;
- undertake product or customer research/development;
- to assist us in and help us to improve our sales;
- to carry out other business development and improvement activities;
- to provide training to our staff, sub-contractors and suppliers;
- editorial, advertising, and marketing processes, including 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;

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. This is done on the basis of our legitimate interests in ensuring our business runs efficiently.

### **8.8 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 10.1 for the types of products we may market to you this way.

### **8.9 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.

### **8.10 Anything you have specifically consented to**

For any purpose which we have obtained your consent to. We will do this only where you have a choice whether to consent or not, you have control over that information and you have had to take an affirmative step to give consent on an informed basis. We will ensure that you can withdraw your consent at any time by providing simple mechanisms if you would like to do so.

### **8.11 Consequences of Not Providing your Information**

You are not obligated to provide your personal information, however, where the information is required for us to provide you with our services/deliver your products, we may not be able to offer some/all our services without it. Sometimes, providing your information to authorities when you travel is a legal obligation for us.

## **9. INFORMATION RETENTION**

We will only retain your personal information 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. We dispose of the information we collect in accordance with retention policies and procedures. However, if we need to retain your data 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.

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

We do not use or disclose your personal information for direct marketing purposes unless:

- we have obtained your consent to do so, such as through an opt-in box on any form or website of ours; and/or
- you have made a booking with us, and it is reasonable to inform you of similar products or services.

If you do not want to receive direct marketing activities anymore, you can manage your communications preferences by clicking “unsubscribe” at the end of every of our electronic communications.

### **10.1 Direct marketing by us**

We will use your personal information to send you marketing information (including adverts and details of promotions) about travel services:

- (1) offered by us;
- (2) which can be booked with third parties through us;
- (3) which can be booked with other companies within our group (i.e. the Travel Corporation Group); and
- (4) offered by third parties selected by us. However, we will not pass any of your details to third parties without your prior and specific consent.

Where applicable we will only send you marketing information about the categories of travel services you have selected. Also, we will only contact you in the manner you agreed to (e.g. by email or SMS).

### **10.2 Direct Marketing by Third Parties**

From time to time, we may disclose your contact details (i.e. your name, email address, postal address, telephone number, mobile number, fax number and preferences) to:

- (1) other companies within our The Travel Corporation, which are bound by the same requirements set in this privacy policy; and
- (2) other companies which offer services that may enhance your travel experience or be able to help you to finalise your travel arrangements (“third parties”). Such third parties may then contact you directly with marketing information about services and products offered by them. Such third parties are not part of The Travel Corporation and are not bound by this privacy policy. However, we ensure that our partners will only contact you in the manner you agreed to (e.g. email, text) when providing your consent.

### **10.3 Withdrawing from Direct Marketing**

You are free to stop receiving marketing information from us at any time by contacting us as detailed in this privacy notice or by following the instructions set out in our marketing communications. If you email us to withdraw your consent, it would be helpful if you could insert the word “Unsubscribe” as the subject heading.”

When you elect to stop receiving marketing information we will, from that point onwards, not share your information further with any other third parties.

You are also free, at any time, to notify any third party to whom we have previously passed your contact details to, that you no longer wish to receive marketing communications from them.

## **11. DISCLOSURE OF YOUR PERSONAL INFORMATION TO THIRD PARTIES**

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

### **11.1 Credit Checks etc.**

We may disclose your personal information to third parties (including intermediaries) as necessary to carry out any checks regarding your financial standing. The identities of these parties may change from time to time. They may include credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.

### **11.2 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.). The identities of these parties may change from time to time and are engaged so we can provide our services to you. We ensure that these third parties carry their tasks with the same level of protection on your personal information that you will expect from us.

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

We may disclose your personal information to any third party (e.g. supplier, contractor sub-contractor) 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 in order to perform our contract with 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.

### **11.4 Insurance**

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

### **11.5 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 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. We ensure that these third parties treat your personal information with the same level of care and duty as us.

#### **11.6 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 and to the terms of this privacy policy.

#### **11.7 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 or when required by a public enforcement body, or
- for the purposes of customs, visas and immigration.

We may disclose your personal information where otherwise required by or permitted by law.

#### **11.8 Direct Marketing by third parties**

We may disclose your personal information to third parties to carry out direct marketing to you, where you have given your prior consent. Please refer to the direct marketing section above for more information.

#### **11.9 Business Customers who are businesses (not individuals)**

If you are a business or organisation (“Business Customer”), and we are holding personal information of any authorised representative (such as an employee agent, employee, officer, owner, partner, or director), then we may disclose to them that personal information.

If a Business Customer is making a booking or booking enquiry on behalf of an individual, with that person’s authority, then we may disclose to our Business Customer that individual’s personal information as reasonably required in connection with such booking or enquiry, or the subsequent performance of or payment for any booking made.

#### **11.10 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. We will ensure that the acquirer is bound by terms similar to this privacy policy to protect your personal information.

#### **11.11 Cross border transfers**

We may transfer your to third parties outside of Canada. In the case of your data being transferred to such third parties, we will ensure that processing requirements set by PIPEDA are met. While your information is in third party jurisdictions, it may be accessed by courts, law enforcements and national security authorities. We ensure that the correct safeguards to keep your data secure are implemented, as set out in Section 14 ‘How we keep your data secure’.

## **12. 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:

### **12.1 Collecting, using and disclosing on our behalf**

In some cases, your personal information may be held and otherwise processed by others on our behalf. We have not included the names of our service partners as these will change over time. We will remain responsible for what they do with your personal information, and your personal information will only be held and processed by them in accordance with our instructions and this privacy policy. The sharing of your information is necessary for the performance of any contract with you and for the efficient provision of our services.

### **12.2 Collecting, using and disclosing 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 your personal information, subject to their own privacy policy, and we will not be responsible for what they do with it following disclosure. This will only be done to perform the contract. When this happens, you will be informed by the third party and they will provide their privacy policy to you.

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

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. 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 collect, use and disclose that information anywhere in the world. Based on the foregoing, some or all of the personal information we collect may be stored or processed on servers located outside your jurisdiction or residence, whose information protection laws may differ from those in Canada or the jurisdiction in which you live. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries. Subject to applicable laws in other jurisdictions, we will use reasonable efforts to ensure that appropriate protections are in place to require the information processor in that country to maintain protections on the personal information that are equivalent to those that apply in the country in which you live.

## **14. KEEPING YOUR INFORMATION SECURE**

## 14.1 Our security measures

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 organisational measures against unauthorised or unlawful collection, use and disclosure 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. We maintain administrative, technical and physical safeguards (appropriate to the sensitivity of such information) designed to protect against unauthorised use, disclosure or access of the personal information we collect on this website. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, while we are committed to protecting your personal information, we cannot ensure or warrant the security of any information you provide. The measures we implement to protect your personal information include:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secured servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to the information;
- using Secure Sockets Layer (SSL) and Transport Layer Security (TLS) software or other similar encryption technologies to encrypt your personal and payment transactions.

Unfortunately, transmission of information over email is not secure, and if you submit any information to us over the internet by email we will do our best to protect your personal information and have contractual processes in place with our service providers to do this. Once we have received your information, we will use relevant procedures and adequate security measures to prevent unauthorised access.

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 e-mails 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 your 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.

## 15. YOUR RIGHTS

You have certain rights under data protection laws, which we summarise below. If you contact us about these rights, we may ask for proof of your identity before we act on any request, and we may refuse to act if you do not provide this, or your identity is not established by you. This is to ensure that your information is protected and kept secure. More information about your rights and our obligations can be found on the website of the Office of the Privacy Commissioner of Canada: <https://www.priv.gc.ca/en/>

To exercise any of your rights below, please use a dedicated online form <https://ttc.com/privacy-policy/personal-data-request-world/>, or send your request via email to [compliance@ttc.com](mailto:compliance@ttc.com).

### 15.1 Right to know

You have a right to know about Lion World Travel Limited's policies and procedures with respect to the management of your personal information.

### **15.2 Access to your personal information**

You may request us to tell you whether we are collecting, using, and disclosing personal information about you, to tell you what personal information we are collecting, using and disclosing and for what purposes, and to provide you with a copy of your personal information that we hold. The law does allow us, in certain cases to refuse your request, and we will advise you at the time if this is the case. If we refuse to provide you with access to information, we hold about you, we will provide reasons for such refusal.

### **15.3 Use causing substantial distress or damage**

You have the right to ask us to stop using your personal information for any purpose in any manner that is causing you or is likely to cause you unwarranted and substantial damage or distress, subject to exceptions.

### **15.4 Use for direct marketing and electronic communications**

You have the right to ask us to stop using your personal information to carry out direct marketing to you as well as to engage in electronic communications with you.

### **15.5 Correction of inaccuracies**

You have the right to ask a court to order us to rectify, block, erase or destroy any inaccurate personal information we hold about you.

## **16. Enforcement**

Lion World Travel Limited process your personal data in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA). The Office of the Privacy Commissioner of Canada (OPC) oversees compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA), which sets out the privacy obligations many private sector organizations must adhere to when they handle personal information in the course of their commercial activities. For federally regulated organizations, PIPEDA also applies to the personal information of employees as well as applicants for employment.

## **17. CONTACTING US**

If you have any questions about our privacy policy or about how we process your personal information, including any requests or complaints, please contact us either by e-mail to [compliance@ttc.com], telephone on 416-322-8468, or by post to Privacy Officer, 33 Kern Road, Toronto, ON M3B 1S9.

## **18. ABOUT US**

This is the privacy policy of Lion World Travel (referred to as "we", "us" or "our"). We are incorporated under the laws of Ontario, Canada. Our incorporation number is 449471 and our incorporation address or registered office is 33 Kern Road, Toronto, Ontario, Canada M3B 1S9. We are a member of TICO (Wholesale Registration #: 1004818, Retail Registration #: 1031815) and USTOA.

## **19. COPYRIGHT NOTICE**

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