

PRIVACY POLICY

1. Who are we

1.1 At Japan Journeys Limited we care about your privacy and we are committed to protecting this, whilst striving to provide the very best user experience. We work very hard to keep your information safe and we want our services to be safe and enjoyable for everyone. We follow strict security procedures on how personal information is stored and used and who sees it to help stop any unauthorised person getting hold of it. We also recognise that it is important for you to understand how we use your personal information.

1.2 This Privacy Policy (and any other documents referred to in it) describes the way we will process and use any personal information about our customers, potential customers, visitors to our website and any other individuals whose data we process in the course of our business. Please read this Privacy Policy carefully to understand our practices regarding your personal information and how we will treat it.

1.3 We have a legal duty to protect personal information that we collect under the Data Protection Act 1998 (and any law which replaces it, including the new UK Data Protection Bill) (the “**DPA**”) and the General Data Protection Regulation (EU) 2016/679, (the “**GDPR**”). For the purpose of the DPA and GDPR, we (Japan Journeys Limited) are the data controller (in other words, the organisation that determines how your personal information is used) and are located at Cameo House, 11 Bear Street, London WC2H 7AS. Our contact details are set out in part 10 below.

2. Personal information we collect, how we use it and our lawful basis for processing

2.1 We may collect and use various types of personal information about you. Details of this information, together with an overview of the way that we use it and our lawful bases for the processing in each case are set out below:

Enquiries and bookings

a) We will collect personal information from you when you make an enquiry or request a brochure from us. This includes your name and contact information, details about the what you are most interested in, the brochures that you request and any additional details of your travel plans which you voluntarily give to us. We may also collect details about the best time to contact you and any in-person appointments that you request as well as what prompted you to contact us and any other requests or comments that you may make.

We will use this information so that we can provide you with information that you have requested or contact you if you have indicated you want to hear from us. We also collect personal information from you when you make a booking through a travel agent, if that is how you come to us.

- We have a legitimate interest to use your information in this way to make sure that we are able to help you find the right destination and start to plan the best holiday for you. Where we rely on our legitimate interests, we'll always ensure that your rights are protected.

b) If you book trips with us, we will ask you to provide certain details about your travel arrangements. This is likely to include details of your passports, emergency contacts, travel insurance arrangements, preferences and special requirements, frequent flier club membership, visa requirements and flights (if you arrange your own flights). This will also include details of any other friends, family, staff or students who are accompanying you as part of your booking.

We will use this information to help us organise your trip, make bookings on your behalf and ensure that you (and any other friends or family, staff or students accompanying you) receive the products and services set out in your itinerary.

- We collect this information so we can fulfil our contract with you and provide you with the quality of service we strive to provide.

Where you are a regular customer we may retain some of this personal information so that we can use it when you next book with us as we have a legitimate interest to improve our customer journey and ensure we look after our regular customers.

c) If you have made an enquiry with us, or booked a trip with us, we will send you information through the post and/or via email.

- We send you this on the basis of our legitimate interests, but you always have a right to object to direct marketing (see further below).

Websites, marketing and advertising

d) We will collect certain technical information about you when you visit our website. This is likely to include: the internet domain you use, your IP address or other device identifier, your browser type and version (e.g. Chrome or Internet Explorer), the operating system and platform that you are using (e.g. Windows or Mac), the screen resolution of your device, the dates and times when you access our website, the full URLs of the pages you visit and the websites or links that you use to access our website, login information, details of products or services that are viewed and the length of visits to certain pages of the website.

We use cookies to collect this information; for more information about what cookies are and how we use them, please refer to our Cookie Policy.

We use this information for site management and security purposes (such as troubleshooting and testing) as well as to help us improve our website. We do not try to identify individual users or their usage habits from this data. Raw data logs are retained temporarily as required for security and site management purposes only.

- We collect this information so we can fulfil our legitimate interests as a business to ensure that our website is fit for purpose and promotes our services appropriately for our customers, including by displaying information that our customers are interested in. We also rely on our legitimate interest in measuring customer satisfaction and troubleshooting any website issues. Where required by law, we may also seek and rely on your consent.

e) We may collect and use information from various sources in connection with the marketing and advertising of our services. This may include your contact details (and your marketing preferences) to contact you with certain marketing messages (e.g. marketing e-mails). We may also use data we collect from you (either directly or via our website or advertising) to help us to measure the effectiveness of our advertising and to establish what interests you and what doesn't.

- We rely on your consent to contact you directly about our offering. In other scenarios in carrying out efficient and appropriate marketing and advertising for our services, we will rely on our legitimate interests, whilst always ensuring that your rights are protected. You can withdraw your consent or opt out of our direct marketing at any time through our marketing preference center or through the 'unsubscribe' option in any marketing email.

f) We may collect your contact details when you enter into competitions or promotions, or complete surveys.

- We will rely on your consent or on our legitimate interests (depending on whether we are marketing or carrying out market research), whilst always ensuring that your rights are protected.

g) We may collect details about you, such as your user name, when you engage with us on social media (by mentioning or tagging us in a post or contacting us directly) this is so that we can respond to any comments and queries you have.

- We rely on our legitimate interests to do this as we want to ensure our customers have the best possible experience, whilst always ensuring your rights are protected.

Wedding Gift List Service

h) We may collect information if you register to use our Wedding Gift List Service. Guests can make a general contribution or buy a particular extra that's on your itinerary. We use this information to administer our Honeymoon Gift Service.

- We rely on our legitimate interests to provide you with added value service whilst celebrating your big day and we will also process this information so we can fulfil our contract with you.

i) If you make a contribution to a honeymoon of friends or family members through our Wedding Gift List Service either online or by calling us; we will collect and use your payment information (including credit or debit card details) in order to process the payment.

- We collect this information so we can fulfil our contract with you and process the payment.

Administrative or other business purposes

j) We may collect and use certain other personal information when we correspond with you (whether by telephone, e-mail or otherwise). For example, we may record both in-bound and out-bound telephone calls to ensure quality of service and for training purposes.

- We collect this information so we can fulfil our legitimate interests as a business to ensure that our Specialists are trained to the highest level so that our customers receive the very best travel advice.

k) We may collect certain other information that you give us, for example, when you contact us for a particular reason other than those set out above such as to report problems with our website.

- It is in our legitimate interests as a business to use your data in this way, for example, we have a clear interest in ensuring that our website works properly and in ensuring that we operate our business efficiently. We will always ensure that your rights are protected.

2.2 As well as collecting personal information directly from you, we also collect some from third parties such as Google Analytics.

2.3 We may also collect and use certain **especially sensitive personal information** about you, namely specific details of any relevant health conditions, disabilities, access requirements and special dietary requirements that you may have. We collect this information directly from you to try to ensure that your trip is appropriate for your needs and to try and keep you safe during any trip that you plan through us. We may need to ask for your explicit consent in order to process this information.

2.4 To the extent you provide us with information about third parties (such as other travellers, guests, staff or students on your trips) we ask you to confirm that you have obtained consent from the relevant third parties to do this. Please also tell them about this privacy policy and give them

our contact details if they have any queries. Please make sure you let us know if any of these third parties would like to speak to us directly, either about the trip or about our use of their data.

3. How we share personal information

3.1 In order to make sure that we run our business efficiently, and to make sure that you get the service that you expect, we will need to share your personal information, from time to time, as necessary, with the following third parties:

(a) Members of our group, which means our subsidiaries, our ultimate holding companies and their subsidiaries (including Eclipse of the Century.), as we share operations with some members of our group.

(b) Selected trusted third party business partners (such as the local businesses we partner with in the locations our customers travel to) and service providers to perform services related to the contracts we enter into with you.

(c) Prospective buyers of our business or assets, which may include your personal information.

(d) Any other third parties if necessary to comply with legal obligations or enforce agreements, for example, we are required to provide airlines with a passenger mobile phone number and email contact details under IATA Resolution 830d for the airline to inform the passenger of any operational difficulties.

(e) Any other third parties if this is necessary to protect our or your rights, property, or safety and/or those of others.

3.2 We do not share your personal information with third parties for them to use for the purposes of sending you marketing information or for those third parties to use your information for their own purposes.

Automated decisions and profiling

4.1 We do not make automated decisions or profile you using your personal information.

5. Where we transfer and store personal information

We may process (or ask or permit a third party to process) your personal information outside of the European Economic Area (EEA) where local laws may not provide legal protection for your information in the same way as is applicable in the EEA.

For example, when you book a trip, we will need to provide your information to local accommodation or service providers. In other cases, we may need to share your information with an overseas service provider such as our local partners who host you, the provider of a cruise or experience of a train journey.

Whenever we send (or permit a third party to send) your personal data outside of the EEA, we will make sure that we take steps necessary to protect your data as required by applicable laws. For example, we may require the overseas recipient to enter into particular contract terms, or we will make sure that the information that we give to them will be limited to what is needed to perform our contract with you.

If you wish to learn more about the safeguards in place to protect your personal information when we transfer it outside of the EEA, please contact us using the details in section 10 below.

The personal data that we collect from you will also be processed by staff operating outside the EEA who work for us or for one of our suppliers. This includes staff involved in, among other things, providing support services.

6. Security of your personal information

6.1 We take the security of your information very seriously and have put physical, technical, operational and administrative strategies, controls and measures in place to help protect your personal information from unauthorised access, use or disclosure as required by law and in accordance with accepted good industry practice. We will always keep these under review to make sure that the measures we have implemented remain appropriate.

7. Retention of personal information

7.1 We will keep your personal information for limited and appropriate periods of time only and the applicable retention periods will always be linked to our purposes for processing your personal information. This means that the retention periods will vary according to the type of personal information. For example, some transaction information will be kept for a number of years in order to comply with various finance and tax related obligations. If you need more information on this, please contact: dataprotection@audleytravel.com

8. Your rights in your personal information

8.1 You have certain rights in respect of the personal information that we hold about you. Details of these rights are set out below. To exercise any of these rights, please contact us (see the "Contact and Complaints" section of this Privacy Policy below).

8.2 Your rights:

(a) Access: We will confirm to you whether or not we are processing and using personal information about you, at your request and, if so, provide you with access to and a copy of such personal information and the other details to which you are entitled.

(b) Rectification: We will correct any inaccurate personal data and complete any incomplete personal data (including by providing a supplementary statement) that we hold about you.

(c) Prevention of processing likely to cause damage or distress: We will respect your rights to require us to cease or not to begin processing your personal information for a specific purpose, or in a specific way, that is likely to cause you or any third parties unwarranted damage or distress.

(d) Erasure: We will erase your personal information at your request without undue delay where there is no good reason for us to continue to use it.

(e) Restriction: We will restrict the processing of your personal information in certain circumstances, if you ask us to do so.

(f) Data portability: We will provide you or third parties on your behalf with a copy of any personal information that we hold about you which you have provided to us in a structured, commonly used and machine readable format.

(g) Objection (including objection to direct marketing): We will respect your general rights to object to the processing of your personal information in certain circumstances, including for direct marketing purposes.

(h) Automated decisions and profiling: We do not make automated decisions or profile you based on your data.

9. Changes to our policy

9.1 We reserve the right to modify this Privacy Policy from time to time – for example, if we need to reflect changes to the way that we use your personal information. Any changes we make in the future will be posted on the following website: www.japanjourneys.co.uk and, where appropriate, notified to you by e-mail. You should check back frequently to see any updates or changes to our Privacy Policy.

10. Contact and complaints

10.1 We are very keen to hear from you, including if you have any questions, concerns, comments, requests or complaints regarding this Privacy Policy, our website and/or our use of your personal information. Please contact info@japanjourneys.co.uk

10.2 If you have any complaints regarding this Privacy Policy or the way that we use your personal information, you may also contact the UK Information Commissioner at telephone number 0303 123 1113 or <https://ico.org.uk/>.