



## PRIVACY POLICY

### 1.0 Introduction

Themba Travel Ltd understands and respects the importance of your privacy. We are committed to safeguarding your personal information under the GDPR law of 2019. In providing our service to you, we need to collect personal information from you. This policy explains how we use any personal information we collect about you through our website and other interactions with you:

#### **Information we collect about you.**

We collect information from you from the start of our interaction with you when:

- Apply and book with us
- Manage the arrangements for your travel experience
- Communicate with our team on the ground in South Africa
- Subscribe to our newsletter
- Provide feedback including complaints

### 2.0 Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes;
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about;
- kept securely.



### 3.0 The kind of information we hold/process about you

Themba Travel Ltd will collect, store and use the following categories of personal data about you:

- Personal contact details such as name, title, address, telephone numbers and personal email.
- Age if you are under 18 years old and parental consent.
- Emergency contact information.
- Dietary requirements
- Motivation and background for Educational, Wildlife and Conservation and Volunteering experiences.
- Photographs.
- Details of websites visited using company-provided internet access, emails and messages sent and received, other correspondence, and work-related social media.
- Your contact preferences.
- We also collect, store and use the following "special categories" of more sensitive personal information:
  - Information about your health, including any relevant medical conditions.
  - Declaration of any criminal convictions

### 4.0 How we collect this information

You may volunteer this information when you request information from us, contact us (and vice versa), make a booking, register interest for and/or enter a competition, subscribe to one of our newsletters, use our website, link to or from our website, connect with us via social media, by speaking to a travel agent or any other engagement our business partners or we have with you. We may also receive the information from a third party, for example:

People making travel bookings on your behalf. Market research and data companies contracted by us to obtain information so that we may improve and market our products and services. Partners are performing services on our behalf. Your insurer, their agents or medical staff may disclose relevant information and sensitive personal information with us in circumstances where we/they need to act on your behalf or in the interest of passengers or an emergency.

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



You represent and warrant to us that you have obtained all required consents and are fully authorised to disclose all personal information you provide to us, including, without limitation, personal information of your friends and family members provided in connection with making travel bookings.

#### 5.0 What we use information about you for?

We use your personal information and details to complete your booking with us, manage the arrangements for your tour or volunteer placement, seek feedback, send you notifications and communicate with you generally.

We do not store customers' credit or debit card information.

To arrange your tour/volunteer placement, we will need to share some of your information with our overseas staff and partner organisations, who are the providers of the services making up your arrangements. These are mostly in South Africa.

We would also like to store and use your details for future marketing purposes, email updates/newsletters. If you have consented to receive marketing, we will only use your name and email address for marketing purposes. We will never sell your details to third parties for marketing.

You can opt out of receiving further information from us at any time. You will be given a fast and easy option to opt out of all newsletters. If you no longer wish to be contacted for marketing purposes, please let us know by contacting us.

Occasionally, the information we hold may include sensitive data relating to your health and data held for equal opportunities monitoring purposes.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- where we need to perform the contract we have entered into with you;
- where we need to comply with a legal obligation;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- where we have gained your specific consent.



We may also use your personal information in the following situations, which are likely to be rarer:

- where we need to protect your interests (or someone else's interests); and
- where it is needed in the public interest or for official purposes.

## 6.0 What are the legal grounds for our processing of your personal information

As a data controller, we have to have a lawful basis or bases for processing your personal data, and have to inform you of the fact that your data is being processed.

Themba Travel Ltd processes personal data on the following bases:

1. Where it is necessary to protect vital interests: We keep and process data of emergency contact details and any particular medical conditions, or your whereabouts, or related travel in order to ensure that your vital interests are protected in the event of an emergency.
2. We process data based on consent: where you agree to it, for example, if you agree to provide consent to a medical report or concerning the use of photographs during your trip. We also provide additional information on our work, such as our campaigns, on this basis.

## 7.0 Sharing Your Information

We may disclose your personal information as follows:

We may share your personal information inside Themba Travel Ltd for the purposes of providing products or services to you, research and marketing purposes. Any marketing purposes will be conducted in accordance with our 'Marketing and privacy' statement below.

We may disclose your personal information to our employees, contractors or third party service providers located in the UK or overseas for the purposes of the operation of our website or our business, fulfilling requests by you, managing your bookings, responding to your enquiries and to otherwise provide products and services to you, including, without limitation, to airlines, tour companies, travel agencies, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants.

We may share information with third parties in limited circumstances without your consent where we reasonably believe the disclosure is necessary to lessen or prevent a threat to life,



health or safety, or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), where disclosure is authorised or required by law or disclosure is otherwise permitted by applicable privacy laws.

In order for you to travel abroad, we may disclose your personal information where disclosure is required by government authorities at the point(s) of departure and/or destination to process your information for immigration, border control, security and anti-terrorism purposes.

Where you provide us personal information for the purposes of booking travel related services on your behalf or on behalf of another person, we must provide such personal information to the travel providers you have selected for the purposes of completing the booking. We have no control over how travel providers use, disclose or store personal information. Please ensure you agree with the privacy practices of the travel providers you select prior to providing us your personal information for the purposes of booking travel related services with such travel providers. You acknowledge and agree that we provide your personal information to such travel providers solely as your agent and not as the principal holder and we will not be required to ensure their compliance with applicable privacy laws, this privacy policy or otherwise be liable or accountable for your personal information including without limitation their use and disclosure of your personal information.

## 8.0 How long we retain your personal information

Themba Travel Ltd follows recommended retention periods, and you should treat the following as guidelines for retention times in the absence of a specific business case supporting a longer period.

<b>Information</b>	<b>Retention Period</b>
Registration form including medical information, emergency contacts	Duration of volunteering/trip plus 3 years
Photographs, Audio, Video	Permanently



## 9.0 Your rights

We respect your right to control your data. Your rights include:

a) The right to be informed

This privacy notice outlines how we capture, store and use your data. If you have any questions about any elements of this policy, please contact us.

b) The right of access

If you wish to obtain a record of the personal data we hold about you through a [Subject Access Request](#), we will respond within one month.

c) The right to rectification

If we have captured information about you that is inaccurate or incomplete, we will update it.

d) The right to erase

You can ask us to remove or randomise your personal details from our records.

e) The right to restrict processing

You can ask us to stop using your personal data.

f) The right to data portability

You can ask to obtain your personal data from us for your own purposes.

g) The right to object

You can ask to be excluded from marketing activity or activity based on our legitimate interests.

h) Rights in relation to automated decision-making and profiling

We respect your right not to be subject to a decision that is based on automated processing.

You also have the right to complain, which can be done directly to Themba Travel Ltd's Data Protection Officer through our Complaints Procedure or you can complain to the Information Commissioner's Office.

For more information on your individual rights, please see the Information Commissioner's Officer's website – [www.ico.org.uk](http://www.ico.org.uk)



## 10.0 Further Information / Data Protection Officer

If you have any questions about this privacy notice or how we handle your personal information or if at any time you want to update or amend your personal data, please contact the Data Protection Officer. Themba Travel Ltd is registered as a data controller with the ICO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Themba Travel Ltd reserves the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.