

# iHA Travels Privacy Policy

In this privacy policy we explain how we collect and use your personal information. This privacy policy applies to all personal information we process about you when you book with us, purchase or use our services, visit our websites, use our mobile applications or otherwise interact with us. We have divided this privacy policy into different sections. Please click on the relevant section below for further information.

## ● 1. Who we are

- We are iHA Travels (also known as Amsterdam Guías & Tours), a Dutch company with offices at Oudezijds Achterburgwal, Amsterdam, The Netherlands.
- Amsterdam Guías & Tours is part of the iHA Travels Group. For more information, please see our website under 'About us'.
- iHA Travels is responsible for the collection and use of your personal data described in this privacy policy.
- We have determined our respective responsibilities for compliance with the obligations under applicable privacy legislation for processing your personal data. In summary, we have arranged that if you want to exercise your rights, such as your right to access, correct, erase, restrict, object or port personal data or to withdraw your consent, or if you have any questions or complaints about the processing of your personal data, you can either contact us in accordance with 'Your rights' (please see below). iHA Travels will assist each other where necessary to ensure that you can exercise your rights and your questions and complaints will be handled. Furthermore, we have arranged that we will inform you about the processing of your personal data our privacy policies.

## ● 2. The types of personal data we process

- 2.1 General. We may collect and process the following categories of personal information:
  - a. Name, passport number and other identifying information
  - For example, we may record your name, title, gender and date of birth, your nationality, country of residence and passport or ID number.
  - b. Your contact details and personal account or registration details
  - Your contact details may include your address, telephone number and email address. When you create a personal account, or register for a service, we may also record your sign in details and other information you fill out on your personal account or registration form. For business travelers, we also collect information relating to your company such as company name and business location.
  - c. Information about your reservations, bookings and purchases
  - When you make a reservation, or book a service with us, we process your reservation and booking information. This information may include details about your service, prices and the date of your reservation or booking. In addition, we process information in relation to ancillary services and products you purchase.
  - d. Information about your service arrangements

- When you book with us, we process information in relation to your journey. Such as your travel itinerary and your travel companions. We may also record any specified medical needs or dietary requests you have and any additional assistance you require.
- e. Your membership of our loyalty programs
- When you become a member of our loyalty programs, we process your membership number, credits balance, awards and benefits, type and level of membership and other information in relation to your membership.
- f. Our communication with you
- When you send us an email or chat with us online or via social media, we register your communication with us. We also register your communication preferences. For example when you unsubscribe from one of our newsletters or when you choose to receive your booking related communication (such as confirmation or check-in notification) via other channels than email (such as WhatsApp, Facebook Messenger or WeChat). When you call us, our customer support will register your questions or complaints in our database. We may also record telephone calls for training purposes or to prevent or combat fraud.
- g. Information we collect when you use our websites, apps and other digital media
- • When you visit our websites, or use one of our mobile apps, we may register your IP address, browser type, operating system, referring website, web-browsing behavior and app use. We also collect information via cookies and similar technologies when you visit our websites or use our mobile apps. For more information please read our cookie policy on the website or the mobile app you use. • We may receive an automatic notification when you open our emails or click on a link in such emails.
- • With your permission, we may also receive your location data.
- • You can also agree to provide us with access to certain data stored on your mobile phone (such as photos and contacts).
- h. Information in relation to social media
- Depending on your social network settings we may receive information from your social network provider. For example, when you sign in for our services using a social network account, we may receive your social network profile including your contact details, interests and contacts. For more information on the personal data that we receive from your social network provider and how to change your settings, please check the website and privacy policy of your social network provider.
- i. Information you choose to share with us
- You may choose to share information with us, for example when you share your interests and preferences with us, leave a comment for us on Facebook, fill out a customer survey or submit an entry for a contest.
- 2.2 Special categories of data. Certain categories of personal information we collect and use, such as data revealing racial or ethnic origin or data concerning health, can be considered 'special categories of personal data' under applicable data protection law.
- We may be required to collect, use and share your special categories of data with third parties for the purposes as described in this privacy policy (please see below). For example, to provide you with assistance or facilities during your travel, which are appropriate to your medical needs.

- 2.3 Cookies and similar technologies. When you use our website or mobile apps we collect information via cookies and similar technologies. For more information please read our cookie policy on the website or mobile app you use.
- 2.4 Specific services, apps or events. For specific services, apps or events, we may collect other types of data and use such data for different purposes than described in this privacy policy. We will inform you about this when you register for the specific service, event or download the specific app.

### ● 3. How we collect your data

- 3.1 We collect the aforementioned categories of personal data in the following ways:
  - a. We collect data you provide to us
    - When you book a service with us, create an online account, register for one of our loyalty programs, contact our customer support, subscribe to receive our emails or mobile push notifications, register for one of our events or participate in a promotional contest.
  - b. We receive your personal data from your travel agent, our airline partners and other companies involved in facilitating your travel arrangements
    - We receive your data from these parties to handle your reservations and bookings and to fulfil your travel arrangements and purchases. For example, when you book a tour through a travel agent, we receive your identifying information and booking details from your travel agent. And if you use a third party platform to search and book a flight, we may receive those details from that provider.
  - c. When you use our website or mobile apps, we collect information via cookies and similar technologies
    - For more information please read our cookie policy on our websites or the mobile app you use.
  - d. Depending on your social network settings, we may receive information from your social network provider
- Please see 'The types of personal data we process' above.

### ● 4. For which purposes we use your data

- 4.1 The main purposes for which we use your personal information are:
  - a. To provide our services to you
    - To handle your reservations and bookings and to fulfill your travel arrangements and purchases, we need to process most of the information described above. For example, we need your name, passport number and other identifying information to issue your ticket. To confirm your booking and to inform you about changes in your booking status, we need your contact details. And, to ensure that you receive the required care, we require your specified medical needs.
  - b. To facilitate our loyalty programs
    - To let you or your company benefit from the discounts and rewards under our loyalty programs, we use your membership information, your booking information and your purchases.
  - c. To provide our online services and mobile apps to you

- • For example, we use your name and booking details when you check-in for your booking with our app.
- • Some of our online services and apps use your location, for example to show you the nearest location of your interest.
- • To ease your use of our online services or apps, we may analyze the data we collect when you use our digital media and combine it with information collected via cookies and similar technologies (please see above). For example, to understand which digital channel (email, social media) or device (desktop, tablet or mobile) you prefer, so we can restrict our communication to that channel or device.
- d. For statistical research
- • General. We use automatic tools to perform statistical research into general trends regarding the use of our services, loyalty programs, websites, apps and social media and the behavior and preferences of our customers and users.
- • Categories of data. To perform our research, we may use the categories of personal data described above, including your booking data (such as date of booking, origin, number and age of passengers), purchased ancillaries (seats, upgrades) and personal details (gender, postal code). We combine this data with the data we collect with cookies and similar technologies when you visit our websites or use our apps. And we merge it with (aggregated) data collected by third party providers using analytical or marketing cookies or similar technologies. For more information on cookies and similar technologies, please check the cookie policy on our website. We only use aggregated data for our analysis and do not use your name or e-mail address. Without your consent, we will not use special categories of data for this statistical research.
- • Examples. We use your booking data and the ancillaries you purchase (upgrades, extra luggage) to improve our services and provide more relevant offers. We also use customer surveys to measure customer satisfaction and to understand what is important for our customers so we can improve our service. And we use cookies and similar technologies to evaluate how our website visitors navigate our website so we can make it more intuitive.
- • Legal basis. We process your personal data for our legitimate interests to develop better services and offers for our customers, to improve our loyalty programs, to provide more responsive customer support and to improve the design and content of our websites and mobile apps.
- • Right to object. You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data for statistical research (please see below 'Your rights').
- e. To send you updates and special offers tailored to your interests
- • Communication. When you book a service with us, we send you personalized ads and special offers for airline related products and services in our booking related emails (unless you opt-out during the booking procedure). For example, before your booking we will send you an email to remind your booking. In this email we may include special offers for your stay or transport at your destination. You may also subscribe to receive emails or mobile push notifications from us with updates and special offers tailored to your interest. For example, you can subscribe to the Amsterdam Guías & Tours newsletter which keeps you informed on attractive fares, inspiring destinations, package deals and the latest news. With your consent, we

may also send you emails on specific occasions, such as a special offer on your birthday or personalized offers for your next trip within a few months after you return.

- We may also use other communication channels to send you personalized ads and special offers, such as postal mail or, with your consent, social channels (such as Facebook Messenger or WhatsApp).
- • Categories of data. We use your contact details to communicate with you. To understand what is relevant to you, we use automatic tools to analyze your personal data. For this purpose, we may use the categories of personal data described above, including your booking data (such as date of departure, origin, number and age of people in the booking), purchased ancillaries (seats, upgrades), information about you (gender, zip code) and the interests and preferences you shared with us. We combine this data with data that we collect with cookies and similar technologies when you visit our websites or use our apps. And we merge it with (aggregated) data collected by third party providers using analytical or marketing cookies or similar technologies. For more information on cookies and similar technologies, please check the cookie policy on our website. Without your consent, we will not use special categories of data.
- • Personalized offers. In our communication (see under above), we include personalized offers from iHA Travels and our partners relating to our services and products. For example, we may include offers for our own ancillaries (upgrades, special offers) or for bike rentals or special offers offered by third parties. We tailor these offers to your interests. For example, with your consent we may send you an email after your booking from a trip with offers based on your booking history to inspire you for your next trip. More information on our partners and the products and services they offer is provided when you subscribe and can be found on our websites.
- • Legal basis. We process your personal data as described in this paragraph for our legitimate interest and the interests of third parties to provide you with relevant updates and offers.
- • Opt-in and opt-out, unsubscribe and right to object. We only send you emails and mobile push notifications with updates and special offers with your prior opt-in. You can opt-out from receiving booking related commercial emails during the booking procedure. You can unsubscribe from these booking related commercial emails and the emails and mobile push notifications with updates and special offers, any time by clicking the unsubscribe link in the email, by adjusting your communication preferences in your account (if available), by changing your smart phone settings (for mobile push notifications) or by contacting us (please see 'Your Rights' below). When you unsubscribe, you will still receive our booking related and loyalty program service emails (such as your booking confirmation, e-ticket and membership welcome mail). You may object to the use of your personal data for direct marketing purposes anytime (please see below 'Your rights').
- f. For other direct marketing purposes
- • General. This paragraph describes specific examples of our use of your data for other direct marketing purposes.
- • Marketing cookies. Our websites use marketing cookies which are typically placed by advertising networks. These networks are companies which act as intermediaries between iHA Travels and advertisers. These marketing cookies are amongst others used to show relevant, personalised advertisements or offers (based on your visit to

and click behaviour on our websites) when you visit those networks or connected websites. For more information on these marketing cookies and how you can withdraw your consent for these cookies, please check the cookie policy on our website or the mobile app you use.

- **Linked site behaviour.** If you log on to our website using your iHA Travels account or if you visit our websites via a link in an email, we will link your site behaviour to your booking data on our data management platform. We mainly use this data to exclude you from further advertising once you have booked a service. For example, when you search for a tour on our main website, marketing cookies will be used to show you relevant advertisements (see previous paragraph). When you book a ticket through one of our other websites (such as our corporate portal) or with one of our group companies, we will stop showing you further advertisements via marketing cookies based on your search behaviour on our main website.
- **Abandoned cart.** When you break of your booking procedure on our website, we will send you a personalized email with a link to your booking procedure so you can continue where you left of. We will only send you such email at your request or if you have agreed to receive updates and special offers from us by email. You can withdraw your consent for such emails anytime by clicking the unsubscribe link in the email, by adjusting your communication preferences in your account (if available) or by contacting us (please see 'Your Rights' below).
- **Custom audience targeting.** We may participate in Facebook's Custom Audience program, which enables us to display personalized ads on your timeline. For that purpose, we may share your email address with Facebook to enable Facebook to determine if you have a Facebook account. To determine our audience, we may use your booking data. [Learn more](#) about how Facebook uses your data for this purpose and how you can [control](#) how information about you is used by Facebook to personalize the ads you see. You can also check the Facebook [privacy policy](#) . We may also use similar programs from other social networks. You may opt-out for participation in our Facebook Custom Audience program and similar programs by sending us an email (please see 'Your Rights' below) from the email address you are opting out of. You may also have provided consent for receiving personalized ads on your Facebook timeline or as part of your use of other social networks via our cookie policy. Please check the cookie policy on our website how you can withdraw your consent.
- **g. To communicate with you**
- We use your contact details to communicate with you in relation to our services or loyalty programs, to answer your questions or to handle your complaints.
- **4.2 Legal basis.** We collect, use and store your personal data to provide services and our loyalty program to you, to comply with the legal obligations we are subject to, if necessary for our legitimate interests or the interests of a third party or on the basis of your consent.
- You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent. For example, by clicking the unsubscribe link in the email, adjusting your communication preferences in your account (if available) or by changing your smart phone settings (for mobile push notifications and location data). You may also contact us to withdraw your consent (please see 'Your Rights' below).

- If you refuse to provide personal data that we require for the performance of the contract or compliance with a legal obligation, we may not be able to provide all or parts of the services you have requested from us. For example, we may have to cancel your flight or we may not be able to provide you with the ancillary services requested by you (such as special meals). If you provide incomplete or inaccurate information, we may be forced to deny you boarding or entry into a foreign territory under applicable Dutch or international laws.
- When we process your personal data for our legitimate interests or the interests of a third party, we have balanced these interests against your legitimate interests. Where necessary we have taken appropriate measures to limit implications and prevent unwarranted harm to you. Our legitimate interests may for example include security and safety purposes or to provide better services and offers to you. For more information on these interests, please see the 'For which purposes we use your data' above. Where we process your personal data for our legitimate interests or the interests of a third party, you have the right to object at any time on grounds relating to your particular situation (please see 'Your Rights' below).
- 

## ● 5. Disclosing or sharing data with third parties

- 5.1 General. We may disclose or share your personal data with our group companies, our operator partners, your travel agents, loyalty program partners, service providers or subcontractors for the following purposes.
  - a. To facilitate your bookings and travel arrangements
    - To handle your reservations and bookings and to fulfill your travel arrangements and purchases, we must share your personal data with our group companies, partners and other companies involved in facilitating your travel arrangements. For more information on our group companies and the partners we work with, please see our website under 'About us'. When you purchase our services through a travel agent or other third party, we also share your personal information data with these parties.
  - b. For support services
    - We use third parties to provide our services, such as IT suppliers, social network providers, marketing agencies, credit and charge card companies and anti-fraud screening service providers. All such third parties will be required to adequately safeguard your personal data and only process it in accordance with our instructions.
  - Within the iHA Travels group, business activities are carried out (and business efficiencies are achieved) by processing or consolidating information (including personal data) in centralized databases and systems. These central databases and systems may be hosted or managed by one group company for other group companies. In addition, for efficiency purposes certain operational functions may be performed by one group company for other group companies. This means that our group companies may have access to your personal data for these purposes. Our group companies may only process your personal data as required for the relevant business function and in accordance with this privacy policy.
  - c. For our loyalty programs and benefits
    - We offer our loyalty programs together with our group company iHA Travels (see also above, 'About us'). The participating companies and loyalty partners are

responsible for processing your personal data. For more information on how they handle your personal data, please check their privacy policy.

- d. Statistical research and direct marketing
- We may share your personal data with group companies and third parties for statistical research and direct marketing. Please see above 'Statistical research', 'To send you updates and special offers tailored to your interests' and 'Other direct marketing purposes' for more information.
- e. To let you benefit from the services of our partners
- With your consent, we may share your information with our partners to let you benefit from the services of these partners that we integrate or offer in our own services and apps. For example, we may share non-personalized information (travel date and duration of the trip) with a hotel booking platform so it can provide you with an offer for a hotel tailored to your trip. Although we select our partners with care, these partners have their own privacy policies that apply to the way they use your personal data.
- 5.3 Third party websites. Our websites and mobile apps contain links to third-party websites. If you follow these links, you will exit our websites or mobile apps. This privacy policy does not apply to websites of third parties. iHA Travels cannot accept liability for the use of your personal data by these third parties. Your use of these websites is at your own risk. For more information on how these third parties treat your personal information, please check their privacy policy (if available).

## ● 6. Security and retention

- 6.1 iHA Travels will take appropriate technical and organizational measures to protect your personal data against loss or unlawful use.
- 6.2 Your personal data will be retained for as long as required for the purposes described in this privacy policy or in so far as such is necessary for compliance with statutory obligations and for solving any disputes.

## ● 7. International transfer of your data

- 7.1 iHA Travels may transfer your personal data to countries other than your country of residence (including countries outside the European Economic Area). This occurs in the course of providing your travel arrangements or because our group companies, partners or service providers have operations in countries across the world. The laws of these countries may not afford the same level of protection to your personal data.
- 7.2 The transfer of personal data to countries other than your country of residence is often necessary to provide our services to you. In other cases, iHA Travels will ensure that adequate safeguards are in place to comply with the requirements for the international transfer of personal data under applicable privacy laws. For transfers of personal data outside the European Economic Area, iHA Travels may use Commission approved Standard Contractual Clauses as safeguards.
- 7.3 We may also be required to disclose your personal data to foreign public or government authorities
- Laws in some other countries may require us to give border control agencies access to booking and travel information. Therefore, any information we hold about you and

your travel arrangements may be disclosed to the customs and immigration authorities of any country in your itinerary. In addition, laws in several countries require iHA Travels to collect your passport and associated information prior to travel to or from those countries. When required, we will provide this information to the relevant customs and immigration authorities. We may also disclose your personal data to government authorities if applicable law requires disclosure.

## ● 8. Your rights

- 8.1 You may contact us to exercise any of the rights you are granted under applicable data protection laws, which includes (1) the right to access your data, (2) to rectify them, (3) to erase them, (4) to restrict the processing of your data, (5) the right to data portability and (6) the right to object to processing.
- 1. Right to access
- You may ask us whether or not we process any of your personal data and, if so, receive access to that data in the form of a copy. When complying with an access request, we will also provide you with additional information, such as the purposes of the processing, the categories of personal data concerned as well as any other information necessary for you to exercise the essence of this right.
- 2. Right to rectification
- You have the right to have your data rectified in case of inaccuracy or incompleteness. Upon request, we will correct inaccurate personal data about you and, taking into account the purposes of the processing, complete incomplete personal data, which may include the provision of a supplementary statement.
- 3. Right to erasure
- You also have the right to have your personal data erased, which means the deletion of your data by us and, where possible, any other controller to whom your data has previously been made public by us. Erasure of your personal data only finds place in certain cases, prescribed by law and listed under article 17 of the General Data Protection Regulation (GDPR). This includes situations where your personal data are no longer necessary in relation to the initial purposes for which they were processed as well as situations where they were processed unlawfully. Due to the way we maintain certain services, it may take some time before backup copies are erased.
- 4. Right to restriction of processing
- You have the right to obtain the restriction of the processing of your personal data, which means that we suspend the processing of your data for a certain period of time. Circumstances which may give rise to this right include situations where the accuracy of your personal data was contested but some time is needed for us to verify their (in)accuracy. This right does not prevent us from continuing to store your personal data. We will inform you before the restriction is lifted.
- 5. Right to data portability
- Your right to data portability entails that you may request us to provide you with your personal data in a structured, commonly used and machine-readable format and to have such data transmitted directly to another controller, where technically feasible. Upon request and where this is technically feasible we will transmit your personal data directly to the other controller.
- 6. Right to object.

- You also have the right to object to the processing of your personal data, which means you may request us to no longer process your personal data. This only applies in case the 'legitimate interests' ground (including profiling) constitutes the legal basis for processing (see 'Legal basis' above).
- At any time and free of charge you can object to direct marketing purposes in case your personal data are processed for such purposes, which includes profiling purposes to the extent that it is related to such direct marketing. In case you exercise this right, we will no longer process your personal data for such purposes.
- 8.2 You may withdraw your consent at any time
- You may withdraw your consent at any time by following the specific instructions in relation to the processing for which you provided your consent. For example, you may withdraw consent, by clicking the unsubscribe link in the email, adjusting your communication preferences in your account (if available) or by changing your smart phone settings (for mobile push notifications and location data).
- 8.3 For more information on how you can withdraw your consent for cookies and similar technologies we use when you visit our websites or use our apps, please check the cookie policy on our website or in the app. There may be situations where we are entitled to deny or restrict your rights as described above. In any case, we will carefully assess whether such an exemption applies and inform you accordingly. + We may, for example, deny your request for access when necessary to protect the rights and freedoms of other individuals or refuse to delete your personal data in case the processing of such data is necessary for compliance with legal obligations. The right to data portability, for example, does not apply in case the personal data was not provided by you or if we process the data not on the basis of your consent or for the performance of a contract.
- 8.4 When you would like to exercise your rights, all you have to do is send your request to the Privacy Office of iHA Travels:
  - iHA Travels
  - Oudezijds Achterburgwal 162
  - 1012DW Amsterdam
  - The Netherlands
  - Email: [booking@amsterdamguias.com](mailto:booking@amsterdamguias.com)
- 8.5 You can also contact us at if you have any questions, remarks or complaints in relation to this privacy policy. However, if you have unresolved concerns you also have the right to complain to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, <https://autoriteitpersoonsgegevens.nl/en>) located in The Hague, The Netherlands.

## ● 9. How we look after this policy

- 9.1 This privacy policy was most recently amended on 14 May 2018 and replaces earlier versions. We may amend this privacy policy from time to time and will notify you of any changes prior to these changes taking effect.