



GDPR Privacy Policy

1. Introduction

- 1.1 At Orbis Expeditions and The Responsible Safari Company we are committed to protecting and respecting your privacy. We follow strict security procedures on how personal information is stored and used and who sees it to help stop any unauthorized person getting hold of it.
- 1.2 This Privacy Policy (and any other documents referred to in it) sets out the basis on which we will process and use any personal information about our customers that we collect from them and that they provide to us. Please read this Privacy Policy carefully to understand our practices regarding your personal information and how we will treat it.

2. Identity and Contact Details

- 2.1 We have a legal duty to protect personal information that we collect under the Data Protection Act 1998, (the “DPA”) and the General Data Protection Regulation (EU) 2016/679, (the “GDPR”).
- 2.2 For the purposes of the DPA and GDPR, we are the data controller and are located at **The Warehouse, Anchor Quay, Penryn, Cornwall, TR10 8GZ**. Questions, concerns, comments, requests or complaints regarding this Privacy Policy, our website and/or our use of your personal data can be addressed to info@orbis-expeditions.com or you may also contact us on **01548 559 178**.

3. Personal Information We Collect from You

- 3.1 We may collect and use various types of personal information about our customers and visitors to our websites at www.orbis-expeditions.com & www.responsiblesafaricompany.com. Details of this information are set out below:
 - (a) When you make enquiries to us we will collect your name, contact information and details about the places you are interested in so that we can provide you with the information that is of interest to you.
 - (b) If you create an Account, we will collect and use your e-mail address and password to administer this.
 - (c) If you book breaks with us, we will collect certain details about your travel arrangements to help us organize your trip.
 - (d) We will collect and use certain technical information about you and your visit when you visit our Website (covered in our Cookie Policy).
 - (e) We will collect details of whether or not you want to receive our newsletter, and will give you the option to unsubscribe when we send our newsletter to you.
 - (f) We may collect certain other information that you give us, for example, if you register with us for our members’ area, complete a survey or report problems with our Website.

4. Lawful Bases for Processing. This will include (but not unlimited to):

- (i) Necessary in the generation of contracts
- (ii) Reasons of Legitimate interest



5. Our Contract with you

5.1 Consent

5.2 We collect, and use, the sensitive personal information of Customers who book trips with us with their explicit consent to use this information for the specific purposes of allowing us to ensure that any special requirements they may have are, as far as possible, taken into account in any travel arrangements. If you give us your explicit consent to use your sensitive personal information in this way, you may withdraw your consent at any time, but this will not affect the lawfulness of any use of this information which took place before you withdrew your consent.

You may also have given us your consent, via the appropriate opt-in box on a contact form or other communication, to provide you with information about our services and any offers you may from time to time be interested in.

You may withdraw your consent at any time by emailing info@orbis-expeditions.com or you may also contact us on 01548 559 178.

Sensitive Personal Information which we Collect from You

5.3 We may also collect and use certain sensitive personal information about you, namely specific details of any relevant health conditions, disabilities, access requirements and special dietary requirements that you may have. Without this information we will be unable to ensure that you have access to the facilities that you need when booking with us.

6. How We Use Personal Information

6.1 We use your data to provide information you have asked for, to enter into contracts with you (if applicable), and to provide you with a good experience of our Website. Without this information, we may be unable to correspond with you, send you e-mail newsletters, provide you with the information and/or services that you have requested, or enter into contracts with.

6.2 We collect and use personal information about our Customers for the following purposes:

- (a) Responding to messages from and corresponding with you and recording any communications.
- (b) Providing the services and information that you ask us for and performing our obligations under any contracts that we enter into with you.
- (c) Sending you marketing materials if you have agreed to receive these (these can be unsubscribed from at any time using links provided in the e-mails).
- (d) Providing information about changes to our services.
- (e) Allowing you to participate in interactive features of our services.

6.3 We may process your personal data in order to provide you with information about our services and any offers you may from time to time be interested in. This does not affect your rights in any way to ask us to stop contacting you in this way and you may do so by emailing info@orbis-expeditions.com or on **01548 559 178**.

6.4 We do not share our customers' personal information, or that of visitors to our website, with third parties for the purposes of sending them marketing information.



7. How We Share Personal Information

7.1 In addition to any parties mentioned above, we may also share our Customers' personal information, as necessary, with the following third parties:

- (i) The Responsible Safari Company (Malawi)
- (ii) Mailchimp
- (iii) Dropbox
- (iv) Amazon Web Services
- (v) Skype
- (vi) Gmail
- (vii) Apple
- (viii) Whatsapp

7.2 We do not share Customers personal information with third parties for the purposes of sending them marketing information.

8. Automated Decisions and Profiling

- (i) We do not make any automated decisions about you.
- (ii) We do not make any decisions based on automated processing at Orbis Expeditions or The Responsible Safari Company.

9. Where We Transfer and Store Personal Information

9.1 Certain necessary personal information that we collect from our customers will be transferred to, and stored at, destinations outside the European Economic Area, (the "EEA"). To safeguard your personal information and to make sure that it is properly protected we rely on certain safeguards including training for our overseas staff and standard data protection clauses. This information is the minimum necessary to supply our service to you and is retained only for as long as is necessary for that part of your journey.

You may request further information on this by emailing info@orbis-expeditions.com or on 01548 559 178.

10. Retention of Personal Information

10.1 We will keep your personal information for limited and appropriate periods of time and as long as required by applicable law/contractual obligations'

11. Your Rights in Your Personal Information

11.1 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

11.2 We will process all personal data in line with your rights, in each case to the extent required by and in accordance with applicable law only (including in accordance with any applicable time limits and any requirements regarding fees and charges). We will respect your personal information rights in respect of:



- (a) Access. At your request we will confirm to you whether or not we are processing and using personal information about you. If we are, we will provide you with a record, 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) Erasure. We will erase your personal information at your request without undue delay.
- (d) Restriction. We will restrict the processing of your personal information in certain circumstances, if you ask us to do so.
- (e) 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.
- (f) 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. We will usually inform you (before collecting your information) if we intend to use your information for such purposes or if we intend to disclose your information to any third party for such purposes.

12. Cookies

- (i) Our Website uses “cookies” and other tracking technologies which are placed and stored on your computer hard drives or in their browser memory, if you agree, when you visit our Website.
- (ii) We use technical information gathered in this way for site management and security purposes and for:
 - Improving our Website and ensuring content is presented effectively.
 - Managing the site and ensuring it is safe and secure, and for statistical and survey purposes (automatically collected and anonymous technical information about visits to the Website is used for these purposes.

Please see further details on our Cookie Policy attached to our website footer.

13. Changes to Our Privacy Policy

- a. We reserve the right to modify this Privacy Policy from time to time. Any changes we make in the future will be posted on the following websites: www.orbis-expeditions.com & www.responsible-safari-company.com. You should check back frequently to see any updates or changes to our Privacy Policy.

Contact and Complaints

If you have any complaints regarding this Privacy Policy that you feel have not been addressed to your satisfaction by contacting us at info@orbis-expeditions.com or on 01548 559 178, then you may also contact the UK Information Commissioner at telephone number 0303 123 1113 or www.ico.org.