

PRIVACY POLICY

1. Pathfinder Tours (2006) Limited ("Pathfinder", "us", "we" or "our") is committed to respecting your privacy and to complying with applicable data protection and privacy laws.
2. We have provided this Privacy Policy to help you understand how we collect, use and protect your information when you contact us to make a booking, request a brochure or visit our websites.
3. You can visit our websites without disclosing any personally identifiable information about yourself (although please note that we may use cookies and collect other non-personally identifiable information about your browsing activity - see our cookie policy for detailed information).
4. If you do submit personal information by booking an excursion with us or completing a web form registration, for example, you can be assured that we will use your personal information only to support your continuing relationship with Pathfinder.
5. We wish to help you make informed decisions, so please take a few moments to read the sections below and learn how we may use your personal information.
6. The information we hold will be accurate and up to date on the basis that you supply us with accurate and up to date information.
7. The personal information which we hold will be held securely in accordance with the relevant data protection and privacy legislation.

A Personal Information Collection

- A.1 We endeavour to collect and use your personal information only with your knowledge and consent. This will be typically when you book and subsequently travel with us, make customer enquiries, register for information or when you respond to communications from us (such as questionnaires or surveys).
- A.2 The type of personal information we may collect could include the following:
 - Name
 - Postal address
 - Birthday – not currently collected
 - Telephone number(s)
 - Mobile phone number
 - Email address
 - Details of any bookings made
 - Any other information provided in relation to your booking preferences collected at registration or through surveys.
- A.3 If you choose to provide us with personal information it will be used in support of the intended purposes stated at the time at which it was collected, and subject to any preferences indicated by you.

B Non-personal Identifying Information

- B.1 We may also collect non-personally identifying information about your visit to our websites based on your browsing activities. This information may include the pages you browse and products and services viewed or booked for example. This helps us to better manage and develop our sites, to provide you with a more enjoyable, customised service and experience in the future, and to help us develop and deliver better products and services tailored to your individual interests and needs. For further information about our use of cookies please have a look at our Cookies Policy.

- B.2 From time to time, if you consented accordingly we may also store and use your information to contact you for market research and marketing purposes. We may contact you by email, phone, SMS (not currently used) or mail.

C How will we use your information?

- C.1 We may use your information for a number of purposes which includes: processing your bookings and managing and administering your account; delivering any information requested by you; responding to complaints or enquiries; verifying your identity when required.
- C.2 We may also undertake market and product analysis based on your bookings and contact you with information about new excursions and special offers by post, telephone and automated means such as mobile text message (SMS - not currently used), Email and advertising (subject to any preferences expressed by you).
- C.3 If you have provided us with your email address you will, unless you have specified otherwise, be sent our email newsletter 'ON-TRACK'.
- C.4 If you have consented to receive details of our excursions, you can contact us at any time to have your details removed from our database used by us for any or all of those purposes, to update your information or to otherwise tell us how you would like to receive information about our trains - the choice is yours.
- C.5 To update your preferences please email office@pathfindertours.co.uk and quote your postcode and/or booking reference number in the body of the email and tell us what you want us to do (i.e. 'opt-out Email', 'opt-out SMS' etc or if you have previously objected to receiving information by post for example, but would now like to change your mind and receive information then just say, 'opt-in post' in the subject header of your email).

D When will we disclose your information to others?

- D.1 We may only disclose information about you and contact details to
- a) our sister company, Torbay Express Ltd, for the purposes, and subject always to the terms of this Privacy Policy Statement;
 - b) to third parties who perform functions on our behalf and who also provide services to us to ensure our booking and financial systems function correctly. This may include professional advisors, IT consultants, research and function co-ordinators. These third parties comply with similar undertakings of privacy and confidentiality as Pathfinder;
 - c) the mail fulfilment house that distributes our brochures – the fulfilment house acts a data processor for us and your details are deleted as soon as the brochures have been posted out;
 - d) MailChimp for the distribution of ON-TRACK, our email newsletter. MailChimp is based in the USA and is certified by the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework;

- e) in the event that we undergo re-organisation or are sold to a third party, in which case you agree that any personal information we hold about you may be transferred to that re-organised entity or third party for the purposes and subject to the terms of this Privacy Policy Statement
- D.2 Please note that Pathfinder does not sell or pass your personal information to third parties (other than as set out in the paragraph above) unless you have given us permission or unless it is strictly necessary to deliver the products and services ordered or used by you and you are notified beforehand. For example, we may disclose your data to a credit card company to validate your credit card details and obtain payment when you book an excursion, a gift voucher or other product or service. We do not hold any card details used for any transactions. We use First Data as our secure payment gateway.
- D.4 Pathfinder may also be obliged to disclose your personal information to meet any legal or regulatory requirements (for example to comply with a court order) or obligations in accordance with applicable law.

E Social media, blogs, reviews

- E.1 Any social media posts or comments you send to us (on the Pathfinder Tours Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook / Twitter) on which they are written and could be made public.
- E.2 Other people, not us, control these platforms. We are not responsible for this kind of sharing. We recommend you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you are unhappy about it.
- E.3 Any blog, review or other posts or comments you make about us, our excursions and services on any of our blogs, reviews or user community services will be shared with all other members of that service and the public at large. Any comments you make on these services and on social media in general must be not offensive, insulting or defamatory. You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

F How long do we keep your information for?

- F.1 To make sure we meet our legal data protection and privacy obligations, we only hold on to your information for as long as we actually need it for the purposes we acquired it for in the first place.
- F.2 In most cases, this means we will keep your information for as long as you continue to use our services, and for a reasonable period of time afterwards if you stop doing so, to see if we can persuade you to come back to us. After that we will delete it other than where we lawfully can keep any data for audit or legal reasons.
- F.3 We shall keep data on our customer database for not longer than 3 years from the date of your last excursion with us, subject to an individual's right to unsubscribe or be forgotten at any time

G Access to your Information

- G.1 You can write to us at any time to obtain details of the personal information we may hold about you. Please email: office@pathfindertours.co.uk or write to: Pathfinder Tours, Stag House, Giddynap Lane, Inchbrook, Stroud, GL5 5EZ
- G.2 Please quote your name and address and booking reference number (if relevant). We would be grateful if could also provide brief details of what information you would like a copy of (this helps us to more readily locate your data).
- G.3 We will take all reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you.

H Information Security

- H.1 Pathfinder recognises that its customers are increasingly concerned about how companies protect personal information from misuse and abuse and about privacy in general. Pathfinder has taken all reasonable steps to have in place appropriate measures to protect your personal data from unauthorised access, accidental loss and/or destruction. When any data is transferred it is via encrypted portals and all access to Pathfinder's websites and booking portals is covered by HTTPS.
- H.2 Please be aware that communications over the Internet, such as emails/webmails, are not secure unless they have been encrypted. Your communications may route through a number of countries before being delivered - this is the nature of the World Wide Web/Internet. Pathfinder cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.
- H.3 Our website contains links to other sites not controlled by us. These sites may send you cookies and collect your data and personal information. We are responsible for the actions, content or the privacy policies of the websites to which our website may link – it is your responsibility to check the status of these sites.
- H.3 The hosting facilities for our websites are located within the UK.

I Privacy Support

- I.1 Pathfinder reserves the right to amend or modify this Privacy Policy at any time and in response to changes in applicable data protection and privacy legislation.
- I.2 If we decide to change our Privacy Policy, we will post the changes on our website so you know what information we collect and how we use it. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will tell you. You will have a choice as to whether or not we are able to use your information in this different manner.
- I.3 If you have any enquiry about Pathfinder 's privacy policy or practices, please email: office@pathfindertours.co.uk or write to: Pathfinder Tours, Stag House, Giddynap Lane, Inchbrook, Stroud, GL5 5EZ

J Monitoring and or recording of all your Communications

- J.1 Monitoring or recording of your calls, emails, text messages and other communications may take place in accordance with UK law, and in particular for business purposes, such as for quality control and training, to prevent unauthorised use of Pathfinder's websites, to ensure effective systems operation and in order to prevent or detect crime.