



W H I T E C A L M

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White Calm Limited are committed to protecting and respecting your privacy.

This policy (together with our terms of use and service and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Data Controller

For the purpose of the Data Protection Act 1998 (the “Act”), the data controller is White Calm Limited of 29 Portland Place, London, W1B 1QB (the Act uses the term “data controller” essentially to refer to the party who determines the purposes for which personal information is collected and used).

[White Calm Limited] is registered on the UK Data Protection Register with number 9308537

However, where (for example, in order to fulfil your request or process a booking you would like to make) we provide your data to one of our travel partners (see section on Our disclosure of your information below), these travel partners will also act as data controllers in relation to their use of your information and they are likely to have separate privacy policies that will apply to this.

Basis of our use of your data & your acceptance of this privacy and cookies policy

For some of the uses of your information described in this policy, there is a legal basis under the Act for us to use the information you provide us with without your consent. (This includes, for example, where the processing is necessary to take steps at your request with a view to entering into a contract, for example to provide your details to one of our travel partners for them to process your booking). Where this is the case, this privacy and cookies policy fulfils our duty to process information fairly, which includes giving you appropriate notice and explanation of the way in which your information will be used.

Where your consent is required for our use of your information, by submitting your information to us, you consent to our use of that information as set out in this policy.

If you disclose someone else’s information to us, you confirm that you have their consent to disclose their information to us and for us to use and disclose their information in accordance with this privacy and cookies policy.

Information we may collect from you

We may collect and process the following data:

Information you give us:

You may give us information about you by filling in forms on our website www.whitecalmretreats.com (“our site”) or by corresponding with us by phone, e-mail or otherwise. This includes information you



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provide when you complete the ["contact us"] section on our site to contact us about a travel package or to report a problem with our site. The information you give us may include your name, address, e-mail address and phone number. If you contact us, we may keep a record of that correspondence.

Information you give us about other persons:

You could also give us information relating to other persons that would be making use of our services, for example persons who will be travelling with you. When you do so, you must ensure that you have the consent of these people in order to provide us with information relating to them before disclosing any information to us.

Information we collect about you from your computer:

Each time you visit our site we may automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

This information is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Sensitive personal data

If you provide us with your sensitive personal data (as defined in the Act), for example, your state of health, you expressly consent to us using your sensitive personal data for the sole purposes of assessing which travel packages are suitable for you and disclosing your sensitive personal data to our travel partners and suppliers if you ask us to proceed with the booking so that they can make the booking for you.

If you provide us with someone else's sensitive personal data, for example, their state of health, you must have their express consent for us to use their sensitive personal data for the sole purposes of assessing which travel packages are suitable for them and to disclose their sensitive personal data to our travel partners and suppliers if you ask us to proceed with the booking so that they can make the booking for you and them.



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Our use of your information

We may use the information we hold about you:

*to respond to your enquiries about the travel packages we can arrange for you;
to deal with any enquiries, correspondence, concerns or complaints you have raised;
[to provide you with information about packages or services we feel may interest you;]
to help us improve our services, for example by acting on any information you have provided to us;
to notify you about changes to our site or services;
to ensure that content from our site is presented in the most effective manner for you and for your computer;
to administer our site and for internal operations, including troubleshooting, data analysis, testing, and statistical purposes; and
to improve our site to ensure that content is presented in the most effective manner for you and for your computer.*

Our disclosure of your information

If you use our site to make enquiry about the travel packages we can offer, we may we will disclose your personal information and other information you provide to us in connection with your enquiry to the relevant third party travel partner and suppliers of the travel package to confirm if they can meet your requirements and to process your booking if you choose to proceed (“Supplier”). We require each of our Suppliers to comply with the Act and all applicable data protection laws whenever they process your personal information.

In the event that we sell or buy any business, shares in a business or assets, we may disclose your personal data to the prospective seller or buyer of such business, shares in a business or assets.

We may from time to time appoint service providers, for example of IT services, to provide services to us. This may involve disclosing your personal data to them to enable it to be processed for a purpose which is consistent with this privacy and cookies policy.

We may be required to disclose information by the government or other law enforcement agencies or in connection with the investigation of unlawful activities or for other legal reasons, including enforcing or applying our terms of use and other agreements; or to protect our rights, property, or safety or that of our customers, or others.

Except as explained above, we will not disclose your personal data to any third parties for any other purpose unless we have your consent or we otherwise legally have the right or obligation to do so.

International data transfers

The information that we collect from you may be transferred to, processed and stored at, a



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destination outside the European Economic Area (“EEA”). By submitting your information to us, you agree to this transfer, processing or storing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this privacy and cookies policy.

Cookies

A cookie is a small piece of data that a website can send to your computer’s browser so that this computer will be recognised by the site on your return.

Cookies allow our web server to recognise your computer on connection to our site, enabling us to provide a better browsing experience. In addition cookies may also be used by us to help gather statistics about the use of our site, such as most visited pages, time spent by users on each page and site performance. By collecting and using such data, we hope to improve the quality of our site.

We use the following cookies on the Website:

Google Analytics cookies to collect standard internet log information and details of visitor behaviour patterns to enable us to maintain and develop our site. The data gathered is anonymous and does not identify individual users.

Strictly necessary cookies to enable you to move around our site and use its features. These cookies do not remember where you have been on the internet. This category of cookies cannot be disabled.

We use the following types of cookies:

Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our site. You may control the cookies used by websites by modifying the settings in your browser - view the help menu to change your cookie preferences.

However, if you disable certain cookies you may be unable to access parts of our site.

To access the Google Analytics opt out browser, please visit <https://tools.google.com/dlpage/gaoptout>. By choosing this option, you will block Google Analytics across all websites.

For more information about cookies, please see the Information Commissioner’s guide which can be found here: http://ico.org.uk/for_the_public/topic_specific_guides/online/cookies.

Security of information

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website and you acknowledge that any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features which are appropriate to the type of personal data you have provided to try to prevent unauthorised access or inadvertent disclosure.



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Marketing

You have the right to ask us not to process your personal data for marketing purposes. [We will ask you for your consent to use your information for email marketing purposes. We may also ask if you consent to us supplying your information to third parties to provide you with offers and information relating to their goods or services which may be of interest to you. You can unsubscribe to receiving marketing communications at any time by clicking on the unsubscribe link in the marketing emails you receive. To unsubscribe from emails that we send, you may also contact us any time at 29 Portland Place, London, W1B 1QB. Please note that it may take up to [10] days before your unsubscribe request has been activated.

Access to your personal information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any subject access requests may be subject to a fee of £10 to meet our costs in providing you with details of the personal information we hold about you.

External websites

Our site may, from time to time, contain links to and from external websites including our travel partners and advertisers' websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Changes to this policy

Any changes we may make to this privacy and cookies policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this policy. Continued use of our site will signify that you agree to any such changes.

Contact us

Questions, comments and requests regarding this privacy and cookies policy are welcomed and should be addressed to 29 Portland Place, London, W1B 1QB. Please also contact us at this address if you would like to update or amend any of your personal information which you have sent us.