



Tel: +27 21 4692652

Fax: +27 21 4692606

Web: [www.iconexpeditions.com](http://www.iconexpeditions.com)

Email: [enquiries@iconexpeditions.com](mailto:enquiries@iconexpeditions.com)

Address: 9 Caxton st, Zonnebloem, Cape Town, SA

PO Box 16451, Vlaeberg, 8018, Cape Town, SA

# Privacy Policy

Last Updated: May 24, 2018

At Icon Expeditions, your privacy matters to us. When you use our services, you are placing your trust in us to ensure the privacy of your personal data and we are committed to protecting it.

This Privacy Policy covers what data we collect about you and why, what we do with that data, and how we handle that data. Throughout this policy, when we write "Icon Expeditions" or "we" or "us," it refers to Icon Expeditions (PTY) LTD, registered in the Republic of South Africa under the company registration number 2014/101371/07.

The address of our headquarters is 9 Caxton St, Zonnebloem, 7925, Cape Town, South Africa.

Please read the following information carefully. If you enquire or book on behalf of others, you are responsible for ensuring that the others are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data. By submitting your data while enquiring or making a booking, you agree to the transfer, storage and processing of this data as necessary. We will take all reasonable steps necessary to ensure your data is treated securely and in accordance with this Privacy Policy, however, if you do not agree with this policy, we cannot accept your booking and you should not use our websites.

## Information we collect

### **Personal data you provide us**

The sort of personal data we collect will be information such as name, address, email address, telephone number, date of birth, and personal travel arrangements. In addition, we may also be required to obtain your passport details. We will need to collect this information to arrange the travel and other services you are requesting.

In some cases, we may also need to collect more sensitive personal data such as information concerning medical conditions, disabilities and special requirements such as



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dietary requests, which may disclose your religious beliefs, so that we can consider your particular needs in relation to a booking.

### **Personal data we collect for legal, compliance, regulatory and crime detection and prevention purposes**

We process your personal data so that we can meet our legal, compliance and regulatory obligations, for legal purposes, such as to respond to a valid legal claim, summons or regulatory order, and to protect our property, rights and interests as well as the property, rights and interests of other persons.

We also process your personal data for crime prevention and detection purposes, including the prevention of fraud for online payments, for identity verification, for credit checking and credit scoring purposes and accounting or audit purposes. If you visit one of our offices you may be monitored by closed circuit television for security purposes. In each case, we do so in compliance with applicable laws.

### **Personal data we collect from third parties**

We collect personal data from third parties who you have authorised to provide your personal data to us (for example, this may be your travel agent or another person making a booking on your behalf, your travel companion, your travel coordinator, our promotion partners, social media and other digital website). We also collect personal data from individuals who may refer you as a friend to our products or services. We ask these individuals to confirm that you are happy to hear from us.

### **Sensitive personal data we collect**

We do not generally collect sensitive personal data from you (or those you are booking for), but where we do, we seek to minimise the collection and use of it and handle it with extra care. We also share this information with third parties (who help manage our business and deliver services such as those parties who provide wheelchairs at airports) and other companies (who help manage your booking or journey), and we transfer it globally.

Where you (or any passenger travelling) provides us with sensitive personal data you agree that you have voluntarily provided such information, and you consent (and the passenger travelling consents) for us to use that information for the purposes for which it was collected.



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### **Personal data we collect when you are making a payment**

We collect different personal data depending on your payment method (such as credit card, bank transfer, cash). For example, for credit card payments we may collect the credit card holder name, address, card number, expiry date and CVC code.

### **Personal data we collect automatically**

When you use our services, we automatically collect certain information, including personal data, concerning the services you use and the way you use them.

This includes:

- Geo-location data, about your approximate location, as determined through data such as your IP address;
- Usage and log data, such as the date and time you accessed our services, the duration of your session, data about clicks, the internet browser you use and which pages have been shown to you;
- Data about your computer's operating system, like application versions and language settings;
- If you're using a mobile device, we might also collect data about the type of device you are using and data such as the mobile network your device is using to access our services.

## **How we use your information**

We use, store, and process information, including personal data, about you to create tailor-made travel itineraries, for marketing purposes, for data analytics, data profiling and to improve the quality of our service.

### **To create tailor-made travel itineraries**

When putting together tailor-made travel itineraries, we may use your personal data to:

- Fulfil our contract with you and/or deal with your booking or intended booking, including processing your booking, sending you your itinerary or other details relating to your booking;



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- Update you on changes to your travel itinerary (for example, if there is a change to your booking pre-travel; if a flight is delayed or cancelled);
- Manage your wider travel or services requirements (for example, liaising with and transferring your data to airlines, service providers and/or travel facilitators so that they can facilitate your booking and/or your travel arrangements so any disruption can be minimised), this includes when you book a tailor-made itinerary, hotel, car or another service which may be provided by us or third parties with us;
- Process payments for your booking, fulfil requests for refunds and for accounting or audit purposes;
- Personalise the service and offers you receive (for example, by being aware of previous travel experiences, transactions or preferences, and tailoring the way we provide our products or services to you based on your preferences and profile);
- Communicate and interact with you at different times throughout your journey;
- Communicate with airlines, accommodation providers and other parties that are part of your journey regarding your experience, preferences, compliments or complaints.

### **For marketing purposes**

We may use personal data to let you know about our products and services that we think may be of interest to you. This may be based on your preferences, derived from Cookies, inferred from your interactions with us, including on our social media accounts or market research. We may also let you know about our corporate services which we believe may be relevant to you in a professional capacity.

We also work with social media and other digital websites to provide you with advertisements within those websites. We provide them with your name and contact details (such as your email address or phone numbers). If these social media and digital websites match profile information provided by us with your profile information held by them then they will serve you our advertisements. The social media websites will not identify you or share other personal data in your social media account with us.

We will only send you direct marketing, whether about us, carefully selected third parties or partners, products or services, in accordance with your marketing preferences. We may contact you by email, SMS/text, social media, or through other communication channels that we think you may find helpful. If at any time you would like us to stop sending you marketing material, please contact us or choose the relevant "unsubscribe" option.



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### **For profiling purposes**

We use personal data such as your date of birth, gender, country of residence, transactions (for example, payments made with us and flights taken), information derived from Cookies and your preferences and behaviours for profiling. Some of the legitimate purposes we profile personal data include:

- To obtain a better understanding of what you would like to see from us and how we can continue to improve our services for you;
- To provide you with tailored content online and optimise your experience of our Website;
- To provide you with tailored advertisements on other websites you visit, such as social media websites;
- To share marketing material we believe may be of interest to you, including from our third-party partners;
- To help us operate our services more efficiently.

We will take steps to ensure that prior to profiling your personal data for a legitimate interest that our legitimate interest is not overridden by your own interests or fundamental rights and freedoms.

### **For data analytics**

We aggregate personal data and remove any identifying elements in order to analyse patterns and improve our marketing and promotional efforts, to analyse website use, to improve our content and products and services, to customize our website' content, layout, products and services, and to support our business operations and we may appoint third parties to do this on our behalf.

We gather certain usage information like the number and frequency of visitors to our website. This information includes which website you were redirected from, which web pages you visit during your session, what browser you are using, your device ID and your IP address. This collective data helps us to determine how our customers use parts of our website and do research on our users' demographics, interests, and behaviour to better understand them. One of the ways we do this is by installing and using Cookies on your browser or device.



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## **To improve the quality of our service**

In our efforts to improve the quality of service we offer you, we may use your personal data to:

Improve the products and services we offer or help us to create new ones;  
Conduct customer satisfaction surveys so that we can obtain a better understanding of how we can continue to improve the products and services we offer or help us to create new ones. During these surveys we may collect personal data from you relating to your thoughts/comments about your experience with us;  
Improve our internal systems, for systems testing, IT maintenance or development training, benchmarking and performance measurement.

## **Legal basis for using your information**

We will only collect, process, use, share and store your personal data where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- We need to use your personal data to perform a contract or take steps to enter into a contract with you. For example, to manage your enquiry, to manage your booking with us, to take payment for your booking, or to complete your travel arrangements;
- We need to use your personal data for our legitimate interest as a commercial organisation. For example, we may record the calls of our travel consultants so that we can review how we handle calls. We may also capture your interactions with our website and booking journey via tools on our website in order to identify errors or issues and ensure your customer experience meets expectations. In all such cases, we will look after your information at all times in a way that is proportionate and that respects your privacy rights.
- We need to use your personal data to comply with a relevant legal or regulatory obligation that we have; and
- We have your consent to use your personal data for a particular activity. For example, where you consent to us sharing special offers with you which, we think, may be of interest.



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## How we share your information

We do not share your personal data with companies, organisations or individuals outside of Icon Expeditions except in the following cases:

### **With your consent**

We may share your personal data when you have provided consent as described at the time of consent.

### **Service providers of your tailor-made travel itinerary**

We will share your personal data with service providers whose products or services you are purchasing through our websites and are part of your tailor-made travel itinerary; or otherwise to service providers such as airlines, tourism agencies, hotel, transfer and car hire companies, tour and excursion providers or travel agents, including if there is a problem with your booking so that your travel agent can resolve it with you.

### **Third-party service providers**

We may share your personal data with third parties, who help us manage our business and deliver our products and services. These third parties have agreed to confidentiality obligations. Any personal data we share with them or which they collect on our behalf is used solely for the purposes of providing the contracted service to us.

These third parties:

- Help manage our IT and back-office systems;
- Advertise our company online and using social media websites;
- Manage communications and tailor marketing campaigns;
- Provide internet and infrastructure services for our facilities;
- Conduct research that assists us in understanding consumer interests.



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## **Payment providers**

We may need to share certain reservation details with the payment service provider and the relevant financial institution to verify payments (such as banks and payment card companies). We may share information with relevant financial institutions if we consider it strictly necessary to detect fraudulent transactions and security incidents.

## **For legal reasons**

We may share personal data with governments, government organisations and agencies, border control agencies, regulators, law enforcement and others as permitted or required by law, in relation to API or such other legal requirements as they apply from time to time when travelling to or from a particular country, and to generally comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.

## **Aggregated data**

We may share aggregated data (combined data of our website users or clients that no longer identifies or references an individual website user or client) and non-personally identifiable information for analysis, demographic profiling, marketing and advertising, and other business purposes.

# How we protect and store your information

## **Protection of your personal data**

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to protect the personal data that you share with us and safeguard the privacy of such information. For example, the measures we take include:

- Placing confidentiality requirements on our staff members and service providers;
- Destroying or permanently anonymising personal data if it is no longer needed for the purposes for which it was collected; and



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- Following security procedures in the storage and disclosure of your personal data to prevent unauthorised access to it; and
- Using secure communication channels on our website such as SSL ("secure sockets layer") for transmitting data that is sent to us. SSL is the industry standard encryption protocol used to protect online transaction channels.

### **Storage of your personal data**

We keep your personal data for as long as is reasonably necessary for the purposes for which it was collected. For example, to manage bookings and provide you with any relevant products or services, as explained in this Privacy Policy. We will ensure that it is disposed of in a secure manner.

In some circumstances, we may store your personal data for longer periods of time, for example, where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements. In specific circumstances, we may store your personal data for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or if we reasonably believe there is a prospect of litigation relating to your personal data or dealings.

## **Other important information**

### **How do we treat personal data about children**

For children younger than 16 years old, the use of our services is only permitted with the lawful consent of a parent or a guardian. In the case where a child is part of a booking, we collect and use personal data of the child only as it is provided by the parent or guardian and with their consent.

We reserve the right to erase all personal data of any child under 16 years old if we become aware that the data was provided to us without the lawful consent of a parent or a guardian.

### **How do we use Cookies**

A "cookie" is a small computer file which is downloaded to your device. It collects information as to how you navigate our websites and the internet and helps us provide better website



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services to you. Cookies cannot harm your computer in any way and are an industry standard. They are small text files that contain only information provided by you, the visitor, to the website. Furthermore, our users may configure their browsers to not accept our cookies.

Cookies may collect personal data about you. Cookies help us remember information about your visit to our website and other settings and searches. Cookies enable us to understand who has seen which web pages and how frequently, and to determine which are the most popular areas of our website. They can also help us to operate our website more efficiently and customise your view of the website to reflect your preferences and activities. They also help us tailor our marketing and advertisements to you on our website, other websites you visit, social media websites and your other devices.

## Your rights

You have certain rights in relation to your personal data. In order to exercise your rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal data to you.

You can exercise your rights by emailing us at [dataprotection@iconexpeditions.com](mailto:dataprotection@iconexpeditions.com). Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request within 30 days or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### **Access your personal data**

You have the right to be given reasonable access to your personal data. You may also have the right to request copies of personal data that you have provided to us in a structured, commonly used, and machine-readable format.



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### **Rectify inaccurate or incomplete personal data**

You have a right to request that we rectify inaccurate personal data. We may seek to verify the accuracy of the personal data before rectifying it.

### **Erase your personal data**

If you no longer want us to use your information, you can also request that we erase your personal data in limited circumstances where:

- It is no longer needed for the purposes for which it was collected; or
- You have withdrawn your consent (where the data processing was based on consent); or
- Following a successful right to object; or
- It has been processed unlawfully.

We are not required to comply with your request to erase personal data if the processing of your personal data is necessary:

- For compliance with a legal obligation; or
- For the establishment, exercise or defence of legal claims.

Please note that if you request the erasure of your personal data:

- We may retain some of your personal data as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety;
- Due to maintenance reasons and protection from accidental or malicious loss and destruction, residual copies of your personal data may not be removed from our backup systems for a limited period of time.

### **Object to us processing of your personal data**

You can object to any processing of your personal data, which has our legitimate interests as its legal basis if you believe your fundamental rights and freedoms outweigh our legitimate interests.

### **Lodge a complaint with a regulator**

If you think that we have not complied with data protection laws, you have the right to lodge a complaint with your local supervisory authority.



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## Changes to this policy

Kindly take note that we reserve the right to modify this Privacy Policy at any time in accordance with this provision and in our sole discretion. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on our websites and update the “Last Updated” date at the top of this Privacy Policy. Once made available on our websites, your continued access or use of our services will constitute your acceptance of the revised Privacy Policy.

## Contact Us

You may contact us with any questions relating to this Privacy Policy by emailing us at [dataprotection@iconexpeditions.com](mailto:dataprotection@iconexpeditions.com) or by postal mail at:

### **Icon Expeditions HQ**

9 Caxton St, Zonnebloem, 7925  
Cape Town, South Africa

### **Icon Expeditions London Office**

First Base Old Street Ltd  
The old Fire Station, 140 Tabernacle Street  
EC2A 4SD, London, United Kingdom