



Privacy Policy

At Mavros Safaris, your right to privacy is of paramount importance to us. We are subject to certain data protection laws that govern how we collect, use, retain and disclose your personal data. We can assure you that every effort is made by us to ensure the security of your personal data and to keep you informed about why we collect your data, what we do with it, and how long we keep it for (among other things). We regularly review and, where necessary, update our privacy information.

About us and this policy (Privacy Policy)

We are Mavros Safaris Limited (10895643) and our UK registered office is 104-104 Fulham Rd, London SW3 6HS. For the purpose of the General Data Protection Regulation ((EU) 2016/679) (GDPR) and the new UK Data Protection Act 2018, we are the data controller of the personal data which we collect, use and process. We are required by those laws to implement and maintain a privacy policy to inform you about the personal data we collect from you as part of ensuring and demonstrating how we comply with those laws.

Accordingly, this Privacy Policy explains how we use the personal data we collect about you. It also explains each basis upon which we collect that data and the purpose(s) for which we use it, together with your associated rights. If you have any queries about how we handle your personal data under this Privacy Policy or otherwise, please contact us at the above address.

Categories of personal data we collect from you

This will depend upon the nature of your transaction with us. Usually we will collect data where you make a booking with us, but we may collect data in certain other scenarios, as set out below. In certain cases, providing particular information will be mandatory if you would like to take advantage of our services (such as a travel booking – see the section headed ‘Uses and legal grounds’ below).



We will tell you where that is the case. We will also make clear where providing information is optional.

Direct bookings

In the case of a direct booking, we will require your name, date of birth, postal address, telephone number and email address where you are the lead name for the booking, together with the names and dates of birth of any other party members.

If you are the lead name, please ensure you have the consent of the other members of your party to provide the above details to us and make them aware that this Privacy Policy is publicly available via our website (though please note that we will be processing each of your personal data in performing our contract with you – see the section headed ‘Uses and Legal Grounds’ below).

If you are a party to a group travel booking but are not the lead name, please note that we will have obtained your details from the lead name for your booking and we will process your personal data in accordance with this Privacy Policy.

If you are the lead name for the booking, we will also require your payment (credit and /or debit) card details in order to administer relevant payment(s).

Special category (or ‘sensitive’) personal data

We may also require certain sensitive information from you, regarding your health, dietary and /or access requirements for example in relation to any particular request you make with regard to your booking. We may also require sensitive information about you which is relevant to any investigation we need to undertake in relation to any personal injury claim you make against our company in order to comply with our legal obligations.

Indirect bookings

In the case of an indirect booking (i.e., where you make a booking through a travel agent), we will only receive the names and dates of birth of the lead name and the other party members for that booking, to enable us to process the booking.



Types of data in the event of a dispute

In the event of a query and / or dispute, we may require more personal information from you (and the other members of your party) to assist us with our investigation. Please see the sections headed 'International transfers' and 'Data sharing' below for further information.

Uses and legal grounds

Core uses

Depending on the nature and extent of your relationship with us, we will use your personal data for one or more of the purposes listed below:

- Bookings: In order to process and administer your travel booking, i.e. performing your holiday contract with us (see further detail in this section below).
- Marketing: In order to email you information about existing or new products and services similar to those you have received from us previously and/or that you have expressly confirmed you would like to receive from us (see further detail in this section below).
- Call monitoring: In order to improve our services to you, we may monitor any telephone call you make to us for training and quality control purposes and/or in order to investigate any complaint you may make about any aspect of our travel services (see further detail in this section below).
- Job applicants: In order process any job application you may make to us (see further detail in this section below).
- [Advertising and behaviour monitoring: please see the sections headed 'Cookies', 'Google Analytics' and 'Website Retargeting' below.]

We will always tell you in advance where we require your personal data for any new purpose. Should that be the case, we will provide you with all relevant information and if appropriate seek your consent to the new purpose and processing.

Other uses

Legal ground: [consent]



We also process your information via our website in the following cases, where you do not make a booking with us:

Feedback form

Contact us form

Brochure request

Subscribe form

In each case, you will be given the opportunity to view our Privacy Policy and to give your consent to receive holiday updates from us. Where you receive holiday updates from us, you will always be given the opportunity to unsubscribe (see ‘marketing’ above).

Legal grounds for core uses

We make use of your data for the purposes set out above on the basis of one of the following legal grounds in relation to each purpose:

- **Consent:** With your clear, affirmative consent. Where we ask you to give your consent to any use we would like to make of your data, for example to enable us to provide you with holiday updates by email, as mentioned above, you will always be given the option to withdraw your consent at any time (which in the above example will involve unsubscribing from our marketing emails) and, in the event of your doing so, your withdrawal of consent will be recorded (and in the above example you will be removed from our mailing list). Should we need to process any sensitive information (called “special category” data under applicable law) of the type and for the limited purpose described above, we will only do so with your explicit consent and in order to process your request.
- **Legal obligation:** In order to comply with any legal obligation, we may be subject to (for example, in order to comply with any court orders).
- **Legitimate interests:** Where we consider it in our legitimate interests to do so having carefully assessed and balanced our interests against your own interests, rights and freedoms.
- **Vital interests:** In order to protect your vital interests (likely to be relevant in an emergency only).
- **Public interest:** For reasons of substantial public interest (likely to be relevant in an emergency only).

Further detail: Bookings

Legal ground: performance of contract

In order to process your booking with us, keep you informed of any relevant information relating to it, and ensure that your travel arrangements run smoothly and meet your requirements, we need to



collect and process certain personal details from you. As set out above, this will usually include the names and addresses of you and any other party members, your credit/debit card details, and any particular health, dietary or access requirements.

International transfers

In processing your travel booking, we are obliged to pass certain information on to the relevant suppliers of your travel arrangements, such as airlines, hotels, transport companies and credit/debit card companies. Some of these third parties may be outside the UK and/or outside the European Union and/or European Economic Area. While some countries have laws to protect personal data that are of a sufficiently similar standard to the GDPR, in other countries steps will need to be taken to ensure the appropriate level of protection is in place. These steps include, but are not limited to, appropriate contract clauses approved by the European Commission https://ec.europa.eu/info/law/law-topic/data-protection_en and appropriate security measures. We will ensure we comply with our own obligations to ensure your information is properly protected in this regard.

We will not however, pass any personal information (including any sensitive/'special category' personal data) onto any persons that are not responsible for any part of your travel arrangements.

If you believe that we may be storing incorrect details relating to you, please write to our webmaster at Mavros Safaris at 104-106 Fulham Road, London SW3 6HS, and we will correct them as soon as possible.

Further detail: Marketing

Legal ground: Your consent

From time to time, we may contact you with our newsletter, telling you about our latest holidays and/or special offers, which may be of interest to you. We will only contact you however where you have confirmed you would like to receive such updates, or where you have booked a previous holiday with us (or even requested a brochure and/or enquired about our holidays and indicated that you would like to hear from us in this way). If we do contact you, you will always be given the option to unsubscribe from our mailing list and we will then arrange for your details to be removed.



Further detail: Call Monitoring

Legal ground: [Our legitimate Interests & legal obligations]

In order to improve our services to you, we may monitor any telephone call you make to us for training and quality control purposes and/or in order to investigate any complaint you may make about any aspect of our travel services. We will only retain and process your information captured for these purposes for as long as it is necessary and to meet any legal or regulatory requirements that may be necessary in connection. If you have any queries about how we handle your information in this regard, please write to Mavros Safaris at 104-106 Fulham Road, London SW3 6HS.

Further detail: Job Applicants

Legal ground: Our legitimate interests.

If you apply for a job with us, all of the information you provide will be treated in the strictest confidence and for the purpose of progressing your application. We will only retain and process your information for as long as it is necessary and to meet any legal or regulatory requirements that may be necessary in connection with your application. If you have any queries about how we handle your information in this regard, please write to us at Mavros Safaris, 104-106 Fulham Road, London SW3 6HS.

Further detail: Cookies

Legal ground: Your consent & legitimate interests

Cookies may in some cases constitute personal data. Please also see the section below headed Website Retargeting.

Further detail: Google analytics

Legal ground: Your consent & legitimate interests

When you visit our website, we use a third-party service, Google Analytics, to gather standard internet log information and details of visitor behaviour patterns. We do this to discover things such as the number of visitors to the different parts of our website. This information is only processed in a way which does not identify anyone (i.e. it is anonymised so that it cannot be attributed to any particular individual). We do not make, and do not permit, Google to take any attempt to discover the identities of those visiting our website. If we want to accumulate personally identifiable information through our website, we will be transparent about it. We will make it apparent when we gather personal information and will explain what we plan to do with it.

Further detail: Website Retargeting

Legal ground: Your consent & legitimate interests

We use cookies or similar technologies to serve online advertising and to identify unique customers. We may work with advertising partners to deliver targeted advertising related to our holiday services. To facilitate targeted advertising, we and our third-party partners may utilise "cookies" (see our above "Cookies" policy) or equivalent identifiers and other audience matching technologies. We use data elements from our corporate marketing databases to assist us in presenting appropriate offers to our prospective clients.



Our advertising partners may place a pixel tag or cookie on certain pages of our website, such as an email registration page or our booking confirmation page. This enables our partner companies to later display a relevant advertisement to you based on your website browsing behaviour. This type of online, targeted advertising — known as "retargeting" — is used to re-engage consumers who previously visited a website. Certain information may be collected and shared with these partners, including what page you viewed, when you viewed it and whether you clicked on the advert (see our above policy on “Cookies”).

Data sharing

We will only share your personal data (including any sensitive information/special category data) with the travel service providers who are relevant to your booking, in order to meet your request(s), and will always do so in a secure manner. We also take steps to ensure that the travel service partners we work with will not share your data with any other party not connected with your booking, and will only retain it for as long as it is necessary to process your booking and /or request. We also take steps to ensure that they keep your data safe and secure whilst it is being processed. We do not sell your personal data to any third parties.

In the event of any complaint or dispute, we may need to share this data with other relevant parties, such as your hotel or airline to help us with our investigation. In the case of a serious dispute involving legal proceedings, we will need to share your data with our insurance company and legal advisors in order to comply with legal obligations and to assist with the handling of the matter.

Complaints

We fully respect your right to privacy and take our responsibility for the collection of your personal information very seriously. We make every effort to ensure that your personal information is kept secure and is only used for the purpose for which it is collected. We will also only retain your data for as long as it is necessary and in accordance with the basis upon which it was collected. In the case of a complaint or a claim, we may need to retain your data for up to 5 years in order to comply with any of



our legal obligations. In the unlikely event that you have a complaint about the information which we collect about you, please write to us at Mavros Safaris, explore@mavrossafaris.com.

Security Policy

We will implement all technical and organisational measures which are appropriate, practicable and/or reasonable to safeguard your information.

Your Rights

Under the GDPR you have the following rights (although these rights may not apply to all circumstances):

- The right to be informed about our processing of your personal data (which we aim to give full effect to through this Privacy Policy and other privacy notices on our website)
- The right to have the personal data which we collect on you corrected if it is inaccurate, or completed where it is incomplete
- As set out above, the right to withdraw your consent or explicit consent (in the case of special category personal data) to our use of your data on that basis
- The right to object to the processing of your personal data in certain circumstances
- The right to restrict the processing of your personal data in certain circumstances
- The right to have your personal data erased in certain circumstances (i.e. the so-called “right to be forgotten”)
- The right to request access to your personal data and information about how we process it. Although this access request is free, please note that if your request is manifestly unfounded or excessive, we reserve the right to charge a reasonable fee based on our administrative costs.
- The right to transfer your data (i.e. the right to “data portability”)
- Rights with regard to automatic decision making, including profiling

You also have the right to make a complaint to the UK Information Commissioner’s Office, which has the power to investigate our compliance with applicable law. The ICO can be contacted via their website at www.ico.org.uk