



## Privacy Policy

This Privacy Notice (“Notice”) sets out how **SC Travel T/A Choices Travel cc** processes and protects the privacy of your personal information.

We need to collect, use and disclose personal information in order to perform our business functions and activities, including making and managing travel bookings on behalf of our customers. We are firmly committed to protecting the privacy and confidentiality of personal information and to maintaining various physical, electronic and procedural safeguards to protect personal information in our care.

We process the personal information of data subjects in accordance with the provisions of the Protection of Personal Information Act No. 4 of 2013 (“POPIA”), as amended.

For the purposes of the General Data Protection Regulation 2016/679 (“GDPR”) we are a “data controller” and/or a “Responsible Party” in terms of POPIA for the processing of personal information you provide to us in connection with:

- our provision of business travel services
- AND
- the provision of retail travel services

There may be instances where your local data protection laws impose more restrictive information handling practices than the practices set out in this Notice. Where this occurs, we will adjust our information handling practices in your jurisdiction to comply with these local data protection laws.

### **What personal information do we collect?**

Personal information has the meaning given under POPIA, and, where the GDPR applies, the meaning of personal data given under the GDPR. Personal information generally means information which relates to a living individual who can be identified from that information, or from that information and other information in a person’s possession, including any expression of opinion, whether true or not, and whether recorded in material form or not, about an identified or reasonably identifiable individual, and any indication of intention in respect of an individual.

Generally, the type of personal information we collect about you is the information that is needed to facilitate your travel arrangements and bookings and to arrange travel related services and/or products on your behalf.

We therefore typically process the following types of personal information about you:

- contact information (such as name, residential/ mailing address, telephone number, email address);
- payment account information (credit/debit card details, including card type, card number, security number and expiry date);
- passport details;
- loyalty program / frequent flyer details;
- health information such as your dietary requirements and health issues (if any); and
- other details relevant to your travel arrangements or required by the relevant travel service provider(s) (e.g. airlines and accommodation or tour providers).

In some circumstances, we may collect personal information from you which may be regarded as sensitive information under POPIA. Sensitive information may include (without limitation) your racial or ethnic origin, philosophical or religious beliefs or affiliations, sexual preferences or practices, membership of political, professional or trade associations (for use in booking special rates), biometric and genetic information, passwords and financial information and health information. Please note that, when necessary for travel arrangements, we may collect from a responsible adult personal information relating to a child of any age, but we do not knowingly collect any such information directly from children.

We will only collect sensitive information in compliance with POPIA, with your explicit consent and where it is reasonably necessary for, or directly related to, one or more of our functions or activities (e.g. to make travel arrangements), unless we are otherwise required or authorised to do so by law. To the extent permitted or required under POPIA, you consent to us using and disclosing your sensitive information for the purpose for which it was collected. For example, if you provide health information to us in connection with a travel insurance application you would like to make, you consent to us using and disclosing that health information in connection with arranging that travel insurance on your behalf. A further example is if you disclose your religious beliefs to us because you are interested in, for example, certain holiday packages, in which case you consent to us using and disclosing that information in connection with facilitating your request. We will not use or disclose sensitive information for purposes other than those for which it was collected, unless we subsequently receive your consent to use it for another purpose.

### **How do we collect personal information?**

We will only collect personal information in compliance with POPIA. We usually collect your personal information from the information you submit during the course of your relationship with us. We will collect this information directly from you unless it is unreasonable or impracticable to do so.

Generally, this collection will occur:

- when you deal with us either in person, by telephone, letter, email;

We may collect personal information about you:

- when you purchase or make enquiries about travel arrangements or other products and services
- when you request brochures or other information from us
- when you provide information, or use our services on social media.

In some circumstances, it may be necessary for us to collect personal information about you from a third party. This includes where a person makes a travel booking on your behalf which includes travel arrangements to be used by you (e.g. a family or group booking or a travel booking made for you by your employer). Where this occurs, we will rely on the authority of the person making the travel booking to act on behalf of any other traveller on the booking.

Where you make a travel booking on behalf of another person (e.g. a family or group booking or a travel booking made for an employee), you agree you have obtained the consent of the other person for **SC Travel cc T/A Choices** travel to collect, use and disclose the other person's personal information in accordance with this Notice and that you have otherwise made the other person aware of this Notice.

You should let us know immediately if you become aware that your personal information has been provided to us by another person without your consent or if you did not obtain consent before providing another person's personal information to us.

We make every effort to maintain the accuracy and completeness of your personal information which we store and to ensure all of your personal information is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal information or if you become aware that we have inaccurate personal information relating to you. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal information that you, or a person acting on your behalf, provide to us.

### **How do we use your personal information?**

We will only process your information, where:

- you have given your consent to such processing the processing is necessary to provide our services to you
- the processing is necessary for compliance with our legal obligations
- the processing is necessary for our legitimate interests or those of any third-party recipients that receive your personal information
- In detail: Where you contact us in relation to a travel booking or query, the purpose for which we collect your personal information is generally to provide you with travel

advice and/or to assist you with booking travel and/or travel related products and services.

- When you book or otherwise arrange travel related products and services through us, we usually act as an agent for the relevant travel service providers (e.g. for a hotel). In this case, we process your personal information as necessary so as to provide the services you requested from us. For example, if you book a flight through us, then we use your personal information to enable your flight to be booked and disclose it to the airline to enable the airline to provide the flight service to you.

We may therefore share your information with our travel service providers such as hotel, airline, car rental, or other providers, who fulfil your travel bookings. Please note that these travel service providers also may use your personal information as described in their respective privacy policy and may contact you as necessary to obtain additional information about you, facilitate your travel reservation, or provide you with your requested services. We encourage you to review the privacy policies of any third-party travel service providers whose products you purchase through us. We will provide you with copies of all relevant travel service provider terms, conditions and privacy policies on request.

When you engage us to book flights on your behalf, we will provide your personal information (i.e. name, email address and/or mobile number) to the relevant airline. This enables airlines to advise passengers of irregular flight operations and disruptions (e.g. flight cancellations, schedule changes) directly.

Other than the above, we will not disclose your personal information without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety of an individual or to public health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), or where such disclosure is authorised or required by law (including applicable privacy / data protection laws).

This Privacy Notice was last updated on 30 June 2021