

At Pedal Taiwan, we understand that how we collect, use, disclose and protect your information is important to you.

This Privacy Policy sets out the types of personal information we receive and collect when you use our services, how we collect it, and what we do with it, as well as some of the steps we take to safeguard information. We have appointed a Privacy Officer to ensure that any personal information you provide to us will only be collected, used and disclosed in accordance with this Privacy Policy. We hope this will help you make an informed decision about sharing personal information with us. In all your dealings with us you must ensure that others you represent are aware of the content of our Privacy Policy and consent to you acting on their behalf.

This Privacy Policy may be updated from time to time. You are responsible for reviewing this Privacy Policy periodically and informing yourself of any changes to this Privacy Policy.

References to 'Pedal Taiwan', 'we', 'our' and 'us' means Pedal Taiwan Limited.

### **Information we collect about you**

Depending on the circumstances, in the course of providing a service to you, we may collect and hold personal information such as:

- your name, date of birth, gender, postal address, telephone number, email address, passport details, medical information and travel insurance details (where applicable);
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries; and
- any additional information relating to you that you or a third party has provided to us directly or indirectly through our travellers' or agents' phone enquiry lines, websites, online presence, customer surveys or to our representatives.

Information that we collect (such as about your health or religion) may be considered "sensitive information" under the Privacy Act. We collect it to provide you with our services, cater to your needs or act in your interest, and we are only prepared to accept sensitive information on the condition that we have your consent.

If you visit our website, we may also collect information that is not personal information to improve the experience for our customers. This information may include the pages you visit, your IP address, browser type and language, and the date and time of your visit. We cannot identify you individually from this information. Some of this information is collected using cookies.

When you are travelling with us, we may take video and images of you that may be used in brochures, in our advertising or on our website. All participants of Pedal Taiwan trips authorise us to use their image (such as a photograph, videotape, film or pictorial representation or recorded voice). If you do not wish for this to happen, please notify us in writing at [info@pedaltaiwan.com](mailto:info@pedaltaiwan.com)

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

You may volunteer this information when you request information from us, contact us (and vice versa), make a booking, register interest for and/or enter a competition, subscribe to one of our newsletters, use our website(s), link to or from our website(s), connect with us via social media, by speaking to a consultant in-store or any other engagement we or our business partners have with you.

We may also receive the information from a third party, for example:

- from people making travel bookings on your behalf;
- from market research and data companies contracted by us to obtain information so that we may improve and market our products and services;
- from other companies within Pedal Taiwan and our related overseas entities;
- from partners performing services on our behalf; and
- your insurer, their agents or medical staff may disclose relevant information and sensitive personal information with us in circumstances where we/they need to act on your behalf or in the interest of passengers or in an emergency.

We will update your information whenever we can to keep it current, accurate and complete.

You represent and warrant to us that you have obtained all required consents and are fully authorised to disclose all personal information you provide to us including without limitation personal information of your friends and family members provided in connection with making travel bookings.

### **Why do we collect, use, hold and disclose your information?**

We collect personal information about you so that we can perform our business activities and functions and to provide the best possible quality of customer service.

We may collect, hold, use and disclose your information for the following purposes:

- administering services we are providing to you such as arranging your tour booking
- some countries will only permit travel if you provide your advance passenger data. These requirements may differ depending upon your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate
- manage our relationship with you, including updates about your tour booking and handling complaints
- to contact you in the event of an emergency
- combining information collected from you at different times for the purpose of research and analysis to provide a better customer experience, including customising online content for you
- to identify and tell you about services we think you may be interested in, including sending email newsletters or sending printed materials to your postal address
- providing relevant information, which may include sensitive personal information, to insurers, their agents and medical staff in circumstances where we/they need to act on your behalf or in the interest of passengers or in an emergency.
- to make improvements to our site(s) and make it easier to find the information you are looking for
- for identification of fraud or error or for regulatory reporting and compliance

When you provide your email address to Pedal Taiwan to make an online booking, your contact details may be retained even if the transaction is not completed. This is so we can assist you in future with online bookings, and as a result of this you may receive a follow up enquiry email. This email will contain information on what action, if any, you can choose that will direct us to cease any further contact with you or destroy the personal information we have collected about you.

We are only permitted to store your personal information for as long as necessary having regard to the purposes for which it was collected or a related or ancillary purpose. We may therefore delete your personal information after a reasonable period of time and, if you have not used our services for some time, you may have to re-enter or re-supply your personal information to us.

We will not disclose your personal information otherwise than as described in this Privacy Policy without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, 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), disclosure is authorised or required by law or disclosure is otherwise permitted by applicable privacy laws.

### **Who do we disclose your information to?**

We may disclose your personal information as follows:

- We may share your personal information inside Pedal Taiwan and to our related overseas entities for the purposes of providing products or services to you, research and marketing purposes. Any marketing purposes will be conducted in accordance with our 'Marketing and Privacy' statement below.
- We may disclose your personal information to our employees, contractors or third party service providers located in the UK or overseas for the purposes of the operation of our website or our business, fulfilling requests by you, managing your bookings, responding to your enquiries and to otherwise provide products and services to you, including, without limitation, to airlines, tour companies, travel agencies, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants.
- We may disclose your personal information to external parties for research purposes and to identify other services you may be interested in, in accordance with our 'Marketing and Privacy' statement below.

- We may share aggregated non-personal information with third parties, such as our travel industry partners to analyse trends and further improve our service to you.
- We may share information with third parties in limited circumstances without your consent where we reasonably believe the disclosure is necessary to lessen or prevent a threat to life, 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), where disclosure is authorised or required by law or disclosure is otherwise permitted by applicable privacy laws.
- In order for you to travel abroad, we may disclose your personal information where disclosure is required by government authorities at the point(s) of departure and/or destination to process your information for immigration, border control, security and anti-terrorism purposes.
- Where you provide us personal information for the purposes of booking travel related services on your behalf or on behalf of another person, we must provide such personal information to the travel providers you have selected for the purposes of completing the booking. We have no control over how travel providers use, disclose or store personal information. Please ensure you agree with the privacy practices of the travel providers you select prior to providing us your personal information for the purposes of booking travel related services with such travel providers. You acknowledge and agree that we provide your personal information to such travel providers solely as your agent and not as the principal holder and we will not be required to ensure their compliance with applicable privacy laws, this privacy policy or otherwise be liable or accountable for your personal information including without limitation their use and disclosure of your personal information.

### **Trans-Border Data Flows**

When you provide, or otherwise allow us to collect, your personal information, you consent to your personal information being disclosed to relevant related overseas entities and third party overseas recipients, as set out below.

In providing our services to you, it may be necessary for us to disclose personal information to relevant overseas entities. For instance, we may need to disclose personal information to our related overseas entities in order to respond to your enquiry. We may also need to disclose personal information to overseas recipients other than our related overseas entities (third party overseas recipients), such as relevant overseas travel service providers for the purpose of arranging your booking with them.

Where we disclose your personal information to a third party overseas recipient, your personal information will generally be received in the country in which the recipient will provide the services to you or in which their business is based. Unless otherwise contemplated herein or otherwise permitted or required by applicable law, we will only disclose your personal information to these overseas recipients in connection with facilitation of your travel booking and/or to enable the performance of administrative and technical services by them on our behalf.

By using our products and services, you agree that we will not be required to ensure that third party overseas recipients comply with UK privacy laws or otherwise be liable or accountable for how the recipient handles your personal information.

We may deal with many different service providers all over the world, so it is not possible for us to set out in this Policy all of the different countries to which we may send your personal information. However, if you have any specific questions about where or to whom your personal information will be sent, please contact us in writing using the contact details below.

Companies to whom personal information is disclosed which are registered in the United States may be required to provide information under the USA PATRIOT Act H.R. 3162.

### **Security of Information**

We have implemented various physical, electronic and managerial security procedures in order to protect personal information from loss and misuse, and from unauthorised access, modification, disclosure and interference. Pedal Taiwan regularly reviews security and encryption technologies and will strive to protect your personal information as fully as we protect our own confidential information.

### **Credit card security**

- All online payments are transmitted over a secure socket layer (SSL) connection.
- Credit card information is transmitted immediately to a payment gateway solution via an encrypted port.

- Pedal Taiwan does not store your credit card number in any of our systems, it is used only within the context of the transaction then destroyed upon receipt from an acquiring bank.
- All credit card payments receive an identification number that is proof of the transaction's acceptance into the banking system. This identification number can be used to trace any transaction back to the credit card issuer (for example, the bank that issued the MasterCard, or VISA credit card).
- Personal information is destroyed or de-identified when no longer needed.

Whilst we take reasonable steps to ensure that your personal information is secure, as the internet is inherently insecure, any personal information or other information you transmit to us online is transmitted at your own risk.

### **Your preferences**

We offer you choices when we ask for personal information, whenever reasonably possible. You have the option of dealing anonymously with us, either on our websites or through other methods. There will be circumstances where this is not possible in order to complete your request. You may decline to provide personal information to us and/or refuse cookies in your browser, although some of our features or services may not function properly as a result. For example, if you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want, including information about discounts, sales or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

### **How do I access and correct my personal information?**

You can enquire about personal information we hold about you by using the contact details below. We will need to verify your identity before disclosing personal information. Please allow up to 10 business days for us to process your request, however we will endeavour to deal with your request sooner.

You can ask us to update any inaccurate, incomplete or out-of-date information we hold about you using the contact details below. There is no fee to make an enquiry or request in relation to your information, or for us to add to, correct or update our records.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

### **Marketing and privacy**

We may from time to time use your personal information to identify new or existing products that we believe may be of interest to you. We may communicate this via email, phone or your postal address. If you no longer wish to receive these updates via email, you may opt-out by clicking the unsubscribe link contained in the message. You can contact us using the contact details below to opt-out of receiving phone and postal updates. You can opt-in in future if you wish to receive these updates again.

We comply with the Spam Act 2003 and do not share, sell or rent information to any third parties for the purposes of direct marketing.

### **Use of TOOLS/"COOKIES" and links to other websites**

If our contact and dealing with you is via our website(s), we may use cookies. By using our website(s), you consent to our use of cookies.

Our website(s) may contain links to third party websites, micro-sites or analytical tools (eg Google) not controlled or owned by us, such as reference, review, ancillary products and services sites or websites owned by our sister companies. It is your responsibility to check the status of these sites before using them. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Please read their applicable privacy policies and terms of use carefully.

## **Lodging a complaint**

If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Our Privacy Officer deals with privacy complaints and any complaints should be directed to our Privacy Officer using the contact details below. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

## **Contacting us**

If you have any questions about this Privacy Policy or are concerned about how we have handled your personal information, we would like to hear from you. We treat privacy matters seriously and will endeavour to correct the matter.

You can contact our Privacy Officer by:

- emailing us at [rob@pedaltaiwan.com](mailto:rob@pedaltaiwan.com)
- by post to Privacy Officer, Pedal Taiwan, Lynden Manor, Langworthy Lane, Maidenhead, UK, SL6 2HH

Our Privacy Officer will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your query or complaint is resolved in a timely and appropriate manner.

## **Cookies**

### **What are cookies?**

When you visit our websites we use cookies. Cookies are small text files placed on your computer by us or our partners. Cookies allow us to identify the computer or device you're using to access our websites - but we can't identify you personally. This information is sent back to our systems as you move around our website.

Cookies are unique to the web browser you're using - so if you're using a desktop computer as well as a mobile, different data will be collected for each. You can find more information on the About Cookies website [www.aboutcookies.org/](http://www.aboutcookies.org/)

Cookies can be set by the owner of the website you're on. These are known as 1st Party Cookies. There are also 3rd Party Cookies that can be set by partner websites. Only the owner of the cookie can see the anonymous information it collects.

You can choose to accept all cookies, reject 3rd Party Cookies or reject all cookies by changing your internet browser settings. If you don't accept cookies, some features of our website won't work. For example, you won't be able to make a booking.

You can set up your web browser to refuse cookies, but this means you won't be able to book on our website or use all of its features.

By using our websites, you agree to us using cookies as set out in this statement.

### **How the cookies are used**

We use cookies for the following purposes:

- Collecting information: This means we can learn more about how you use our website so we can improve our products and online experience.
- Tailoring your experience: Cookies allow us to provide you with information, products and services that we think you'll find interesting.
- Making our marketing relevant: We can show you relevant offers and promotions on our own websites and through our advertising networks.

We may use cookies to find out more about how you use our website - like the searches you make and your preferences. We use this information to:

- Make it possible for you to use our website
- Show you information and offers that are relevant to you
- Find out more about how our customers use the site

### **Buying our products online**

When you're buying something on our website, we need to use cookies to keep track of what you're booking as you move through each stage of the booking process. We use cookies to keep track of your searches and preferences.

Your recent searches and shortlisted holidays are recorded using cookies. If you've made a shortlist but you haven't saved it by entering your email address, we'll store your shortlisted holidays using a cookie, so you'll be able to see it when you visit us again using the same computer or device.

### **Improving your experience**

We use cookies and software programmes to record, measure and analyse how our customers use our website. We use this information to understand what you want from our website, which helps us when we're considering future products like flight routes and holidays.

We can find out how you move around our website, so we can look into any errors stopping you from being able to do what you want. The data we collect from cookies is really important for us to improve your experience.

### **Making your experience personal**

We can find out how you move around our website, so we can look into any errors stopping you from being able to do what you want. The data we collect from cookies is really important for us to improve your experience.

### **Advertisements on other websites**

If you visit one of our partner sites, you might see an advertisement that's relevant to what you searched for when you last visited our own site. We work with advertising networks who use cookies to collect information on your preferences, meaning we can show advertisements tailored to you.

### **Types of cookies we use**

Third party vendors use cookies to help us evaluate the effectiveness of our marketing and deliver more tailored advertisements to you on other sites. When you visit certain sections of the website, Google Analytics, a website analytics service provided by Google Inc ("Google"), will place cookies on your computer's browser. The information generated by the cookies about your use of the website is transmitted to Google. This information is then used for the purpose of compiling statistical reports to enable us to measure and analyse the number of visits to the site and its pages, the average time spent on the site and the pages viewed. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personal data of visitors to our website. We will not associate any data gathered via use of cookies with any personal data from any source as part of our use of Google Analytics. For further information about Google Analytics please visit [www.google.com/analytics](http://www.google.com/analytics) and for details of Google Analytics' Privacy Policy, please visit [www.google.com/intl/en](http://www.google.com/intl/en).

You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on which you may access at <https://tools.google.com/dlpage/gaoptout/>.

### **Refusing cookies after you've accepted**

#### **Refusing cookies**

You can change your browser settings to accept or refuse all cookies, choose which cookies you want or don't want, or ask to be notified when a cookie is set. Use the help feature in your browser to see how.

### **Changing your mind after you've accepted our cookies**

If you change your mind after you've accepted our cookies, you'll find an option within your internet browser to clear cookies that have already been set. Use the help feature in your browser to see how. You'll then need to change your browser settings to refuse cookies in future.

Just so you know, you won't be able to benefit from all the features of our website and email newsletters or book online with us if you refuse cookies.