

## **MOBILE APP PRIVACY POLICY**

**We** (European Travel Ventures Ltd and The Ski Week Ltd) are committed to protecting and respecting your privacy.

This policy applies to your use of the 'Day 8' (formerly named 'The Week') mobile application software (the **App**), once you have downloaded or streamed a copy of the App onto your mobile telephone or handheld device (**Device**).

- Any of the services accessible through the App (**Services**) that are available on the App Site or other sites of ours (**Services Sites**), unless a separate privacy policy applies to a particular Service, in which case that privacy policy only applies.

This policy 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.

For the purpose of the Data Protection Act 1998, the data controllers are:

- (a) European Travel Ventures Ltd (trading as The Yacht Week); and
- (b) The Ski Week Ltd

### **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following data about you:

- **Information you give us (Submitted Information):** This is information you give us about you by filling in forms on [www.theyachtweek.com](http://www.theyachtweek.com) and [www.theskiweek.com](http://www.theskiweek.com) and the Services Sites (together **Our Sites**), or by corresponding with us (for example, by e-mail or instant chat). It includes information you provide when you register to use the App Site, download or register an App, subscribe to any of our Services, search for an App or Service and when you report a problem with an App, our Services, or any of Our Sites. If you contact us, We will keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, the Device's phone number, age, username, password and other registration information, financial and credit card information, personal description, photographs and social media details.
- **Information we collect about you and your device.** Each time you visit one of Our Sites or use one of our Apps we may automatically collect the following information:
  - technical information, including the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting and other similar information (**Device Information**);
  - details of your use of any of our Apps or your visits to any of Our Sites including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access (**Log Information**).
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- **Location information.** We may use GPS technology to determine your current location. You will be asked before such information is collected. Some of our location-enabled Services require your personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time.
- **Content information.** We may request information stored on your Device, including contact information, friends lists, login information, photos, videos or other digital content, check ins.
- **Information we receive from other sources (Third Party Information).** We are working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

If you contact us, We may keep a record of that correspondence.

## CONTENT

By posting photographs, videos or other applicable content (**Content**) to the App, you grant Us a non-exclusive licence to use such Content for any purpose, commercial or otherwise. By posting an image to the App you warrant and represent that you have the right to grant such a licence and that all necessary image releases have been acquired in advance.

## USES MADE OF THE INFORMATION

We use information held about you in the following ways:

- Submitted Information - creating a user profile; identifying users to other users of the App; collecting feedback
- Device information and Log information - monitoring usage patterns and demographics
- Content – marketing; promotion
- Location information - geo-tagging content and posts; marketing.
- Third Party Information - associating user profiles with external 'event' and social media profiles

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

## DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006.

We may disclose your personal information to third parties:

- In the event that We sell or buy any business or assets, in which case We may disclose your personal data to the prospective seller or buyer of such business or assets.
- If European Travel Ventures Ltd or The Ski Week Ltd or substantially all of their assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If We are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
  - protect the rights, property or safety of European Travel Ventures Ltd/The Ski Week Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## WHERE WE STORE YOUR PERSONAL DATA

The data that We collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. These staff may be engaged in the fulfilment of your request, order or reservation, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted. Where We have given you (or where you have chosen) a password that enables you to access certain parts of Our Sites, you are responsible for keeping this password confidential. We ask you not to share passwords 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 Sites; any transmission is at your own risk. Once We have received your information, We will use strict procedures and security features to try to prevent unauthorised access.

Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

## **YOUR RIGHTS**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if We intend to use your data for such purposes or if We intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms We use to collect your data. You can also exercise the right at any time by contacting us at [developer@europeantravelventures.com](mailto:developer@europeantravelventures.com).

Our Sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates (including, but not limited to, websites on which the App or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

## **ACCESS TO INFORMATION**

The Data Protection Act 1998 gives you the right to access information held about you. Your right of access can be exercised in accordance with that Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information We hold about you.

You can make an access request by contacting us: [developer@europeantravelventures.com](mailto:developer@europeantravelventures.com)

## **CHANGES TO PRIVACY POLICY**

Any changes We may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you when you next start the App or log onto one of the Services Sites. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

## **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [developer@europeantravelventures.com](mailto:developer@europeantravelventures.com)