

# Privacy Policy and Website Use Terms

Last updated: December 2019

## 1. About This Document

This is the privacy policy of Highland Explorer Tours Inc. (referred to as "we", "us" or "our"). We are incorporated under the laws of California. Our incorporation address is 5551 Katella Ave. Cypress, CA, 90630. This document sets out our privacy policy in respect of consumer personal information, which will govern the way in which we process any personal information that you provide us with. It serves as an expression of our commitment to protecting your private personal information. We adopt this policy to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice. Please see Section 9 below for the rights which the law provides you with in relation to your personal information.

We will provide a link to this privacy notice when you are using our website, providing any personal information to us, or booking any travel services with us and we will ask you to read and confirm you have read this document where we collect your personal information.

## 2. Our Commitment

We respect your right to privacy and we aim to ensure you have a trustworthy experience with us, including when using our websites or shops and booking with or through us. We understand that you care about how your personal information is used by us, and we want to share with you the policies and practices we've adopted. This way you can feel confident about how we handle your personal information that you entrust to us.

## 3. Who Our Privacy Policy Covers

### **3.1 Our customers**

Our privacy policy sets out how we process personal information relating to individuals who are booking or enquiring about booking travel services with or through us or who are the recipients of any travel services booked with or through us (e.g. you are the passenger for a booking or booking enquiry made by someone else for you), or who are customers or potential customers or recipients of travel services that can be booked with or through us.

### **3.2 Examples of who this policy covers**

We include in this privacy policy personal information we process relating to: (1) individuals who are making any enquiry or booking with us or through us, and individuals in respect of whom any enquiry or booking is made (such as friends, family members, and tour group members, and officers and employees of businesses and organizations booking with or through us); (2) individuals in respect of whom any enquiry or booking is made with us by an agent; (3) where our customer is a business or organization, employees or individuals who are acting as representatives of that business or other organization, and individuals connected to that business or other organization, such as owners, partners, shareholders, and directors; (4) individuals who visit our website or other online sites operated by us or our contractors or affiliates; (5) individuals who create an online account (if applicable); (6) individuals whose personal information from other companies in our group (such as where you have consented to your personal information being disclosed to other group companies for marketing purposes); and (7) individuals or businesses from any other arrangement with us.

### **3.3 When we are an information processor only**

This privacy policy does not apply where we are processing personal information strictly as a sub-contractor or information processor on behalf of a third party, and not on our own account. In this case, you should look to that third party, who will be answerable for how we process that personal information and its privacy policy.

### **3.4 Terms used in this policy**

When we refer to "you" and "your" in this privacy policy, we refer to you, any such individual whose personal information we process from time to time.

When we refer to "process" or "processing" of your personal information, this includes collecting, recording, storing or holding your personal information, and anything we do with it, such as organizing, adapting or altering it, retrieving, consulting or using it, disclosing it or otherwise making it available to others, combining it with other information, and blocking, erasing or destroying it.

When we refer to "travel services" this covers all products and services which may be booked with or through us, such as bespoke holidays, package holidays, accommodation, tours, transport and transfers (whether by air, coach, bus, train, ferry, taxi or other means), car hire, cruises, and charters, and it includes both (1) all such products and services which we supply or operate ourselves (including where we sub-contract); and (2) any such products and services provide by a third party which we book for you (acting as agent for you or that third party). Travel services also include any services we or a third party provide in association with travel, such as obtaining visas, foreign exchange, and providing local representatives and support.

#### 4. Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, account name, Social Security number, driver's license number, passport number, age, photograph, gender, address, telephone, mobile, fax, e-mail, social networking contact details, proofs of identity and address, copies of passports, driving	YES

	licenses, and utility bills, card and other payment details, and financial information, health information relevant to your planned travel, and travel insurances held, results of searches carried out against you (such as to verify you identity, address, and credit status), your preferences, frequent flyer or travel partner program affiliation and member number, and any other information provided to us by or in relation to you which concern you as an individual or other similar identifiers.	
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions),	YES

	sexual orientation, veteran or military status, genetic information (including familial genetic information).	
D. Commercial information.	Information concerning enquiries and bookings made with or through us for travel services, including where you are making the enquiry or booking or are the recipient of the travel services to which the enquiry or booking relates. Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, records of enquiries and searches for holiday and travel products made by or on your behalf, details of your personal interests, needs and other data relevant to your enquiry; details of results, quotes, proposals, estimates and other information given in response to enquiries; details of the holiday, accommodation, travel, car hire, and other travel services booked or enquired about; details of the passengers / holidaymakers travelling; details of the provider of the travel services (e.g. tour operator); dates and times of travel; price; payment details (including card details); passport information and visa information; foreign exchange requirements and arrangements; and sensitive information such as health, medical, dietary, mobility, disability, religious or other special conditions or	YES

	requirements.	
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	<p>Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.</p> <p>Information generated concerning the performance of any booking or other contract made with or through us, including information relating to anything arising during any holiday or other travel services, and information relating to payments to be made.</p> <p>Information collected or generated out of any surveys we conduct.</p> <p>Information collected or generated out of any competitions or promotions we run.</p> <p>Information concerning any accounts, registrations, or memberships with us, or participation in any loyalty program.</p> <p>Correspondence, communications and messages, including between you and us, and between us and</p>	YES

third parties, including relating to any booking or booking enquiry, or performance of any contract.

We may collect information about your visits to, browsing of, and use of our website, unless your web browser blocks this. The range of information we collect will depend on how you interact with our website.

This information may include: your IP address (a unique identifier allocated to your computer for your connection to the internet); your computer device details (PC, tablet, smartphone, watch etc.); the make and version of web browser (e.g. Internet Explorer, Firefox, Safari, Opera, Chrome) you are using; your operating system (e.g. Windows, Windows Phone, OSX, iOS, Android, Linux etc.); your time-zone; your browser plug-ins; any web-page you came from, identified as the referrer web page address by your web browser; cookies; page response times; download error; pages and parts of pages you visit; usage you make of our website, including enquiries and searches undertaken, and registrations for accounts, forums etc.; services and products you viewed; length of visit to website and pages; page interaction information (such as scrolling, keys pressed, mouse clicks, touches, and mouse-overs). This will normally be collected and used anonymously, and aggregated for analysis, with

	<p>your name and any characteristics identifying you remaining anonymous, but our privacy policy will apply, and it will be treated as your personal information, if this information is in any way linked to you personally. This information may also include: information inputted into forms and field; registrations for any accounts, forum, feedback mechanism, social functionality, newsletters or other features of our site; usernames and passwords, log-in / out history, and settings; actions taken within any account or other registration, including view and update and changes to settings; and posts to any forum, feedback, review or other social functionality on our website.</p>	
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	<p>Current or past job history or performance evaluations, business or organization details (such as name, address, telephone numbers, payment arrangements, financial information, etc.), your relationship with that business or organization (such as owner, partner, director, shareholder, employee, or agent), and your contact details within that business (such as work address, work telephone and mobile numbers, work fax number, and work e-mail address).</p>	YES



J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## 5. How We Collect Or Generate Your Personal Information

This section sets out the ways in which we may collect or generate personal information concerning you. We obtain categories of personal information listed above from the following categories of sources:

## **5.1 Visiting our website**

By visiting and using our website you or your computer may provide personal information. This includes: information which is automatically provided by your browser to our servers; information record on our web servers about your interaction with our website and pages viewed; information we capture or place on your computer or generate using cookies or other technologies on our website; and information you input into forms and fields on our website.

## **5.2 Data you provide**

Your personal information will include information you provide (or later amend), whether: from correspondence with you; verbally to us over the phone or in person; by filing in any field or form on a website; by posting on our social media channel; by posting on any forum referencing us; by filling in any printed form we provide you with; by e-mail; from documents you provide use with; and from updates to any information to provide from time to time. This includes when you: register or subscribe for any service, account, members, or loyalty program, or make an enquiry or booking for a holiday or other travel services whether in person, by phone, through our website or otherwise; send us your comments or suggestions; subscribe to any newsletter or other publication; and request sales and advertising information, including brochures.

If you do not provide us with your personal information we will be unable to provide you with information or book travel services for or on your behalf.

## **5.3 User Generated Content (UGC)**

We may process, Information or content provided by you in relation to your feedback or experience on a past, current or future trip with us. We will only use such content and images you have submitted to our social media channels or websites, if you have given consent to let Highland Explorer Tours and TTC subsidiary companies to process this information in various initiatives. These could include any marketing activities such as:

Print materials - on our website - email activities - social posts - images on our trips - provide images to our trade partners to use on their websites, email marketing and other marketing initiatives -

make available in our content feeds - We would share imagery in our content feeds, image repositories, via email and share with our trade partners via these methods - Any other information provided to us by or in relation to you which concerns you as an individual.

#### **5.4 Data obtained from third parties**

We may obtain personal information concerning you from third parties, including from: people making enquiries or bookings on your behalf, providers of any holidays, accommodation, other travel services which are enquired about or booked, and their intermediaries; credit, fraud, identity and other searches we may undertake, including searches with public records and regulatory and private organizations; from any business or organization you are associated with; from telephone numbers identified by the telephone system when you telephone us.

#### **5.5 Data generated by us**

We and any suppliers or sub-contractors working for us may generate personal information relating to you, including in connection with responding to and dealing with any enquiry, booking or complaint; or in performing any booking or other contract with you; or through the analysis of your personal information or information gained from your use of our website. We may record telephone calls with you.

### **6. What Do We Use Your Personal Information For?**

We commit to use your personal information only for the purposes listed below and for as long as it is necessary to achieve these purposes.

#### **6.1 Operate our website**

To operate and provide the search, booking, accounts, review, forums and other services, facilities and functions of our websites. This includes customizing your online experience by providing you with more relevant online offers and updates, managing any accounts or registrations you have with our websites and making changes to your settings and profile at your request.

## **6.2 Provide information and respond to enquiries**

to provide information to you about our website, systems and services, including to respond to booking enquiries and searches for holidays and travel, and to keep you updated generally.

## **6.3 Bookings and other contracts**

To enable you to make bookings, and to fulfill, provide, perform, administer, manage, and enforce all bookings, orders, and other contracts which relate to you (including if you are a passenger in a booking made by someone else), and to process any transactions authorized or made with us which relate to you.

## **6.4 Payments**

To collect and make payments due and administer our accounts.

## **6.5 Communication with customers**

To communicate with you concerning any enquiries, bookings, travel services provided, problems and complaints, and to respond to any submissions, enquiries or requests from you.

## **6.6 Record keeping**

To keep internal records and maintain reasonable archives, including concerning as to enquiries, bookings, contracts, travel services, and complaints.

## **6.7 Manage and improve our business**

To analyze, audit, provide, operate, administer, maintain and improve our business, website, systems, and services; to carry out surveys and analyze the results; to run promotions and competitions; undertake product or customer research/development; to assist us in and help us to improve our sales, editorial, advertising and marketing processes; to carry out other business development and improvement activities; and to provide training to our staff, sub-contractors and suppliers. For example, we may use your personal information to help us profile how our customers generally are using our websites and booking travel services with (or through) us. We may also use this

information to ascertain interests so that we can better tailor our business offerings.

### **6.8 Direct marketing**

To carry out direct marketing to you. See next section below for further information.

### **6.9 Advertising**

To report aggregate information concerning usage of our websites to our advertisers. We normally create anonymous statistical data about browsing actions and patterns, and do not identify any individual.

### **6.10 Advertising**

For any purpose which we have obtained your consent to.

## **7. Use Of Your Personal Information For Direct Marketing**

We do not use or disclose your personal information for direct marketing purposes unless we have obtained your express consent to this, such as through an opt-in or opt-out tick box on any form or website of ours.

### **7.1 Direct marketing by us**

Where you have consented to this, we may use your personal information to carry out direct marketing and send you marketing messages, materials, adverts and promotions relating to travel services we provide or which can be booked with third parties through us.

Where you have consented to this, we may also use your personal information to carry out direct marketing and send you marketing messages, materials, adverts and promotions relating to travel services which are offered by or which can be booked through any other company in the same group of companies as us (i.e. within the Travel Corporation group) or third parties selected by us.

You will be free to withdraw your consent to this at any time, by contacting us as detailed in this privacy policy or as detailed in any direct marketing that you receive or by clicking the 'unsubscribe' button at the bottom of any of our emails. In any e-mail you send we would ask you to insert "unsubscribe" as the subject heading.

## **7.2 Direct marketing by third parties**

Where you have consented to this, we may disclose your personal information which is contact information (such as name, e-mail, postal address, telephone, mobile or fax number) to any other company in the same group of companies as us (e.g. within the Travel Corporation group), or to third parties selected by us. They will use this to carry out direct marketing in their own right and will use it to send you marketing materials, adverts and promotions relating to products and services they offer or which can be booked through them. You will be free to withdraw your consent to our disclosure of your personal information for this purpose at any time, by contacting us as detailed above. If you withdraw your consent, this will not affect any disclosures we have already made (i.e. we will not be able to remove your personal information from anyone we have disclosed it to), but we will tell you who they are on request, and you should contact them directly concerning this.

## **8. Disclosure Of Your Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

- A. Identifiers.
- B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).
- C. Protected classification characteristics under California or federal law.

- D. Commercial information.
- F. Internet or other similar network activity.
- I. Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have sold personal information for direct marketing purposes, where you have given your prior consent.

We transfer your personal information to third parties in the following circumstances:

### **8.1 Credit Checks**

We may disclose your personal information to third parties (including intermediaries) as necessary to carry out any checks concerning you or enforce any booking or contract with you (including credit, security, fraud and identity checks). This may include credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.

### **8.2 Bookings and performance of contracts**

We disclose your personal information to third parties (including intermediaries) as necessary to deal with any booking enquiry being made by or for you, to make any booking requested by or for you, to perform and administer any booking for you or other contract with or in respect of you. This may include; to apply for visas on your behalf, to collect payments to be made by you, to investigate and respond to complaints, and to enforce any booking or other contract with you. Such third parties may include any suppliers or sub-contractors and their agents (e.g. airlines, coach, ferry or train

companies, hoteliers, hire companies, cruise companies, tour operators etc.).

### **8.3 Suppliers of travel and other services**

We may disclose your personal information to any third party (e.g. supplier, contractor sub-contractor) we make any enquiries with concerning or engage or sub-contract to perform any booking or other contract, including to provide any travel, tour or other products or services we have agreed to provide to you. We may disclose your personal information to any supplier with whom we make any enquiry concerning or book any travel or other products and services for you as agent (whether as agent for you, someone representing you, or the supplier), such as a tour operator. Details of any third-party tour operators or other third parties who will be responsible for or supply you with the travel services booked or enquired about, may be obtained from us on request, and may be stated in any tour or other brochure provided by us.

### **8.4 Insurance**

If any application is made through us for any travel or other insurance to cover you, we will pass your personal information on to the insurer. Information provided by you may be put on to a register of claims and shared with other insurers to prevent fraudulent claims.

### **8.5 Business Function Outsourcing**

Where we use third parties to host, provide, operate or supply any part of our websites, databases, systems, business, or services, or carry out on our behalf any of our business functions or actions (including sending mail, processing payments, providing marketing assistance, providing customer and advertising analysis, and providing customer services), then then we may provide your personal information to them as required for use for or processing as part of those purposes.

### **8.6 Public forums etc.**

Where any facility on our website is clearly designed to make certain of your personal information public (e.g. posts you make to any public forum or reviews facility), then any personal information you provide in relation to that forum or other facility, which is



provided in circumstance where it is clear that it is intended to be published, will be disclosed to the public accordingly, subject to moderation by us.

## **8.7 Legal Requirements**

We may supply personal information to a government authority or regulator where required to comply with a legal requirement, for the administration of justice, for the purposes of customs, visas and immigration, or where reasonably required to protect your vital interests or enforce any booking or other contract. We may disclose your personal information where otherwise required by or permitted by law.

## **8.8 Direct Marketing by third parties**

We may disclose your personal information to third parties to carry out direct marketing to you, where you have given your prior consent, to third parties to carry out direct marketing. See the direct marketing section above.

## **8.9 Customer Representatives**

If our customer is a business or organization, and we are holding your personal information in your capacity as an associate of that business or organization (including as agent, representative, contact, employee, officer, owner, partner, or director), then we may disclose to them that personal information. If our customer is making a booking or booking enquiry on your behalf, with your authority, then we may disclose to our customer your personal information as reasonably required in connection with such booking or enquiry, or the subsequent performance of or payment for any booking made.

## **8.10 Business acquirers**

If our business is ever transferred to a third party, then your personal information will be transferred to the acquirer to enable them to continue our business.

## **9. Your Rights And Choices**

The CCPA provides California residents with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

### **9.1 Access to Specific Information and Data Portability Rights**

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### **9.2 Correction Of Inaccuracies**

You have the right to ask us to rectify, block, erase or destroy any inaccurate personal information we hold about you.

### **9.3 Deletion Request Rights**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another customer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with customer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## 9.4 Exercising Your Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable request to us by either:

- Telephone at (800) 687-1002.
- Email to [compliance@ttc.com](mailto:compliance@ttc.com) OR raise a request through this link <https://ttc.com/personal-data-request/>

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## 9.5 Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a

request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## **9.6 Personal Information Sales Opt-Out and Opt-In Rights**

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time. You can manage your communication preferences at any time from your account. You (or your authorized representative) may also exercise the right to opt-out by submitting a request to us by visiting the following page:

<https://www.highlandexplorertours.com/do-not-sell-my-personal-info> and filling in the dedicated form, or sending us an email to [info@highlandexplorertours.com](mailto:info@highlandexplorertours.com).

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by managing your communication preferences in your account on our website. We will only use personal information provided in an opt-out request to review and comply with the request.

## **9.7 Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.

- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## **9.8 Compensation**

You have the right to claim compensation for damage and (in certain cases) distress you suffer if we do not comply with the laws referred to above.

## **9.9 Complaints to Applicable Authority**

The laws we comply with are regulated by the US Department of Consumer Affairs. In addition to your rights above, it is open to you, if you have a complaint or concern, to seek assistance from such government regulator, who has powers to compel us to comply with applicable laws and fine us for non-compliance. However, before you do so, we would hope that you will contact us first to discuss any complaint or concerns you have.

## **10. How Third Parties Will Handle Your Personal Information**

Where we provide your personal information to a third party one of the following two circumstances will apply:

### **10.1 Processing on our behalf**

In some cases, your personal information may be held and otherwise collected and used by them on our behalf, in which case we will remain responsible for what they do with your personal information, and your personal information will only be held and collected and used by them in accordance with our instructions and this privacy policy.

### **10.2 Processing on their own account**

In other cases, your personal information may need to be provided to them to be held and processed by them in their own right and on their own account. In such case, they will have their own responsibility for that personal information, subject to their own privacy policy, and we will not be responsible for what they do with it following disclosure.

## **11. Location Of Your Personal Information**

### **11.1 Transfer of personal information overseas**

We (and any affiliate, subcontractor or other person processing your personal information on our behalf) may transfer, store and otherwise process your personal information anywhere in the world to fulfill the purposes set out in this policy, for example to: (1) our overseas offices; (2) information processors (including operators of global travel distribution systems); (3) airlines, hotels and other travel service products; and information technology and business service providers.

In many cases the transfer is necessary to initiate or complete a booking or other transaction on your behalf in response to a request by you or for the purpose of entering a contract with a third party on your behalf.

Where we disclose your personal information to third parties, that disclosure may also involve a transfer of your personal information anywhere in the world, and those third parties may themselves transfer, store or otherwise process that information anywhere in the world.

In each case, we will comply with any legal requirements concerning the transfer of your personal information by us to any third party outside the country where we are established, and where your personal information is still controlled by us or is being stored or otherwise processed on our behalf, our security measures (as detailed below) will also apply.

### **11.2 Countries to which your personal information is transferred**

The countries which we transfer your personal information depends on your booking. Generally such countries include those in Asia Pacific, Africa, North and South America and Europe.

## **12. Keeping Your Data Secure**

### **12.1 Our security measures**

#### **12.1.1 Our general commitment**

We are committed to doing what we reasonably can to keep your personal information secure, and we are obliged by law to put in place appropriate technical and organizational measures against unauthorized or unlawful processing of your personal information and against accidental loss or destruction of, or damage to, your personal information. We have accordingly implemented security policies, rules and technical measures with a view to achieving this.

#### **12.1.2 Transmissions between your web browser and our servers**

We use Secured Socket Layer ("SSL") software in order to encrypt the personal information that you provide to us whilst it is in transit over the internet. This will work if your browser is SSL enabled (which most are). You can verify that this is working by looking for the symbol of a closed lock or solid key on the bottom bar of your browser window, and checking that the prefix for the web address in the browser address bar has changed from "http" to "https".

#### **12.1.3 Storage of your personal information**

The personal information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures.

### **12.2 Your security measures**

For your own privacy protection, we encourage you to maintain anti-virus and other malware protection software on your computers and other devices, and to maintain your own measures to protect your personal information. Please do not include sensitive personal information in any e-mails you may send to us, including payment card information.



We also encourage you to be careful about who you give personal information to. We never contact you to ask you for sensitive personal information, such as payment card information, or sensitive personal information such as passport numbers or log-in details, and we will only ask you for such information in person or through our website, or by telephone in connection with a booking you are making or have made. Please let us know if you someone purports to contact you in our name.

### **13. How Long Do We Keep Your Personal Information For?**

We keep your personal information for so long as is reasonably necessary for the purposes for which we use it, and if longer, for any duration required by law, and for statutory claims limitation periods where your personal information may be relevant to any possible liability we may have to you.

### **14. "Do Not Track"**

We are required to let you know how we respond to web browser Do Not Track (DNT) signals.

We do not respond to such signals at this time.

### **15. Changes to This Privacy Policy**

We reserve the right to amend this privacy policy at our discretion and at any time without notice to you, including by publishing a new version on our website. When we make changes to this privacy policy, we will notify you by email or through a notice on our website homepage to make sure that you are aware of any changes. You can check the top of the document to see the latest version in force. Any change will be prospective only, and we will not make any changes that have retroactive effect unless legally required to do so.

### **16. Contacting Us**

If you have any questions about our privacy policy or about how we process your personal information, including any requests, queries of complaints, please contact us either by:

- E-mail to [info@highlandexplorertours.com](mailto:info@highlandexplorertours.com)

- Telephone on (800) 687-1002
- Post to 5551 Katella Ave. Cypress, CA, 90630

## **16. Copyright Notice**

This document, and all content of our websites is Copyright© 2019 Brendan Vacations, Inc. ALL RIGHTS RESERVED.

## **17. Applicable Law and Disputes**

Our privacy policy is subject to the law of the state of California, County of Orange and disputes can be determined by the courts of state of California, County of Orange.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by managing your communication preferences in your account on our website. We will only use personal information provided in an opt-out request to review and comply with the request.

## **12. Contact details**

If you have any questions about our privacy policy, cookies or about how we process your personal information, including any requests, queries of complaints, please contact us either by:

- E-mail to [compliance@ttc.com](mailto:compliance@ttc.com)
- Telephone on (800) 687-1002
- Post to 5551 Katella Ave. Cypress, CA, 90630