

## ABAMBO FAMILY SAFARIS

This document has been designed using the guidance procedures provided by the Information Commissioners Office (ICO) and in relation to the statutory requirements with regards our obligations to the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).

We are committed to safeguarding the privacy of our customers. Any and all data submitted to Abambo Family Safaris will be held in accordance with the 1998 Data Protection Act and held in secure domains at all times.

Our principal form of business is safari travel management for private individuals and their families. Our registered office address is 40, Lower Ground Floor, Bloomsbury Way, London UK and is the address to which all formal communication should be addressed.

Our website address is [www.Abambotravel.com](http://www.Abambotravel.com).

Abambo Family Safaris will only ever transfer minimal client data to any location - in accordance with Data Protection Principle 2 ("Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes"). Furthermore, Abambo Family Safaris warrants to The Client (and its employees submitting personal data) that it shall:

- a) only process Personal data in accordance with The Client's instructions and to fulfil our obligations in respect of the scope of works of any agreement and make no other use of it without express permission.
- b) take appropriate technical and organisational measures against unauthorised or unlawful processing of The Client's Personal data and against accidental loss or destruction of, or damage to, Personal data
- c) not do or permit anything to be done through act or omission which would cause The Client to incur any liability under the Act or any other applicable data protection laws and regulations (or any legislation or regulations from time to time amending or replacing the same), including without limitation all laws intended to implement the Data Protection Directive (95/46/EC) (referred to as "data protection laws")

Furthermore, Abambo Family Safaris agrees that, outside of the tools used to fulfil the services contracted with us, it shall not engage any third party to process of The Client's Personal data unless The Client has provided express written consent AND

- a) the third party selected has provided sufficient guarantees in respect of the technical and organisational measures governing the processing to be carried out, and
- b) the third party has entered into a written contract with Abambo Family Safaris which imposes on the third party obligations identical to those imposed on Abambo Family Safaris under the data protection clauses within any given agreement

Each contractual client acknowledges and agrees from the outset that in order to fulfil the services within any given agreement, it is impossible to ensure that data

is wholly stored within the EEA or any single geographical designated area as there is a regulatory requirement to submit information to the Principal in order to fulfil travel booking requirements.

Abambo Family Safaris shall not transfer personal information or data outside the European Economic Area without The Client's prior written consent unless Abambo Family Safaris and the recipients of such personal data have entered into the standard contractual clauses (in relation to controller-to-processor transfers) annexed to the Commission Decision of February 2010 on standard contractual clauses for transfer of personal data to processors established in third countries (2010/87/EU).

Abambo Family Safaris has and will continue to take all reasonable steps, in accordance with all relevant legal responsibilities, to ensure the reliability of any of its employees which will have access to the personal data of The Client. If Abambo Family Safaris receives any complaint, notice, request (including any subject access request) or communication which relates directly or indirectly to the processing of the Personal Data or to either party's compliance with Data Protection Laws, we shall immediately notify The Client (deemed to be acting thereafter on behalf of its employee) and Abambo Family Safaris shall provide The Client with all reasonable assistance.

#### DATA RETENTION POLICY GUIDING PRINCIPLES

##### Information Held

Abambo Family Safaris Travel has and maintains two registers of data held. The first covers data we hold in order to conduct our business i.e. that of our customers.

The second covers employee data.

##### Information Collected

Abambo Family Safaris Travel may collect, store and use the following kinds of personal data:

- a) information relating to any transactions carried out in order us to fulfil requests in association with our defined scope of works
- c) information that you provide to us for the purpose of registering your personal profile and for access to our technology
- d) any other information that you choose to send to us which is pertinent to the scope of works for which we are contracted or for the fulfilment of personal travel requests – this information may extend in this instance to family members

##### Cookies

We reserve the right to use cookies on our main website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. All internet browsers allow you to refuse to accept cookies but restricting our access may have a negative impact upon the usability of many websites.

##### Disclosures

In addition to the disclosures outlined within this policy we may disclose information about you:

- a) to the extent that we are required to do so by law
- b) in connection with any legal proceedings or prospective legal proceedings
- c) in order to establish, exercise or defend our legal rights - including providing information to others for the purposes of fraud prevention and reducing credit risk

Abambo Family Safaris Travel Privacy Policy  
Customer Information & Data Security  
INDIVIDUAL RIGHTS

#### The right to be informed

##### The right of access and rectification

Abambo Family Safaris Travel is a Data Processor and process data for the purposes of providing its services (Travel). The Data is controlled by the customer. Our principal form of business is travel management. Our customers can have their data changed by addressing us directly. This will be changed on their behalf per their request. All these requests however should ideally be provided in writing so an audit trail exists. If the customer is not willing to put it in writing, we will document the

##### The right to erasure

Any request to delete information should be addressed via email to us to action within statutory timelines.

##### The right to restrict processing

Abambo Family Safaris will accept a written request to restrict processing i.e. to no longer book travel for said individual. In any case where the client does not want to send the request in writing, the agent who receives the instruction will effectively document the request.

##### The right to data portability

Today, all existing customers can have access to all transaction data via the standard flat-file XLS/CSV format provided. All Profile data will be deleted after a customer has transitioned to a new TMC (Travel Management Company). Prior to that, and typically as part of a hand-over, profiles can be sent over secure means. There are however exceptions such as credit card details as well as passport details unless explicit permission and indemnification for any subsequent data loss or quality is provided. Customers will typically not wish to transport data however if such a request were formulated, the IT department would acquiesce within 30 days.

##### The right not to be subject to automated decision-making

At time of creation of this document, Abambo Family Safaris Travel does not utilize automated decision making in any of its processes. Should this change, Abambo Family Safaris Travel will always provide an opt-out capability and will also review any objections within the framework provided in GDPR.

#### POLICY AMENDMENTS

We reserve the right to update this privacy policy from time-to-time and will post the most upto-date version on our website at any given time without announcement.