Privacy notice

This privacy notice explains which personal data CvA travel processes, why, on what legal basis, with whom we share it and how long we keep it. It also explains how we use WhatsApp and cookies, and what rights you have. This notice is based on the General Data Protection Regulation (GDPR) and the Dutch Telecommunications Act (Telecommunicatiewet).

1. **Who we are**

   CvA travel, De Valk 35, 4112 HA Beusichem, the Netherlands, Chamber of Commerce no. 91635233, is the controller responsible for processing your personal data. You can contact us at info@cvatravel.com or on +31 6 463 325 28. CvA travel has not appointed a data protection officer; questions about privacy can be sent to info@cvatravel.com.

2. **What data we process and why**

Purpose	Data	Legal basis (GDPR)	Retention period
Preparing a travel proposal or quotation	Name, email address, telephone number, travel wishes	Steps prior to entering into a contract (Art. 6(1)(b))	1 year after the last contact if you do not book
Booking and performance of the trip, including the online travel portal	Name, address, date of birth, nationality, contact details, flight details, height (frame size), dietary requirements, emergency contact, passport details where needed for a visa or permits	Performance of the contract (Art. 6(1)(b))	2 years after the end of the trip; passport details and emergency contact no later than 3 months after the trip
Safe participation: health information and allergies	Conditions, limitations and allergies you tell us about	Explicit consent (Art. 9(2)(a))	No later than 3 months after the trip; longer only in the event of an accident or complaint
Payment and accounts	Name, address, payment details, invoices	Legal obligation (Art. 6(1)(c))	7 years (statutory retention period

			for tax purposes)
Customer contact by email, telephone and WhatsApp	Name, telephone number, email address, content of messages	Performance of the contract or legitimate interests (Art. 6(1)(b) and (f))	1 year after the last contact or after the end of the trip
Newsletter and e-book	Name, email address	Consent (Art. 6(1)(a))	Until you unsubscribe; then deleted within 1 month
Website and cookies	IP address, device and browser data, browsing behaviour	Consent, except for functional cookies (see Article 6)	See the cookie overview
Help in an emergency during the trip	Name, health information, emergency contact, insurance details	Vital interests (Art. 6(1)(d) and Art. 9(2)(c))	For as long as needed to deal with the emergency

We use only photographs and videos in which participants cannot be recognised for promotional purposes. Our trips are intended for participants aged 18 and over.

3. **Who we share data with**

We do not sell your data. We share it only where necessary for the purposes above:

- **Local partners and travel service providers** in the country of destination, such as our partner in Uganda and our partners in Rwanda, Tanzania, South Africa, Vietnam and Laos, accommodation providers, guides and the authorities that issue permits for gorillas and chimpanzees. They receive only the data they need to perform your trip.
- **Bookinglayer** (booking system and online travel portal) and **Mollie** (payment service provider).
- **Service providers for our website and marketing**, such as our website administrator and hosting provider, the marketing agency Marketing Makers Agency, Google (Tag Manager, which we use to load measurement code on the website; Analytics and YouTube only with your consent), Microsoft (Clarity,

only with your consent), Cookie Confirm (cookie consent) and our newsletter service MailBlue (the Dutch provider of ActiveCampaign software).
- **WhatsApp (Meta)** if you contact us via WhatsApp (see Article 5).
- **Emergency services, doctors and your insurer** where necessary in an emergency.

We enter into a data processing agreement with service providers that process data on our behalf.

4. **Data outside the European Union**

Your trip takes place outside the European Union. To perform the trip, we pass on data to our partners and travel service providers in countries including Uganda, Rwanda, Tanzania, South Africa, Vietnam and Laos. Different privacy rules apply in those countries than in the EU. We do this because it is necessary for the performance of your package travel contract (Art. 49(1)(b) GDPR) and we limit it to what is necessary. We pass on health information and allergies only with your explicit consent. Some service providers, such as Google, Microsoft, Meta and ActiveCampaign (the software behind MailBlue), also process data in the United States. This takes place on the basis of the EU-US Data Privacy Framework or the European Commission's standard contractual clauses.

5. **WhatsApp**

5.1. You can contact us via WhatsApp Business on our business number +31 6 445 105 81, on working days between 9 am and 5 pm. This number is for WhatsApp messages only; we do not answer telephone calls on this number. To call us, please use +31 6 463 325 28.

5.2. WhatsApp messages are end-to-end encrypted. WhatsApp (Meta) does, however, process data such as your telephone number and when you send messages. The WhatsApp privacy policy applies to this.

5.3. Please do not send us passport details or medical information via WhatsApp. Use email or the online travel portal for this.

5.4. We do not use Meta AI in conversations with customers, and we delete chats no later than 1 year after the last contact or after the end of the trip.

5.5. If we create a WhatsApp group for a group trip with the participants and the guide, joining it is voluntary. Your telephone number will then be visible to the other participants. We close the group after the end of the trip. You can leave the group at any time.

5.6. You can also always contact us by email or telephone.

6. **Cookies**

6.1. Our website uses cookies and similar technologies. We use:

- **Functional cookies**, which are necessary for the website to work and to remember your cookie choice. We do not ask for consent for these.
- **Analytical cookies** from Google Analytics and Microsoft Clarity, to see how the website is used and to improve it. To do so, Clarity also records clicks, scrolling and visits as session recordings; anything you type into forms is masked. We place these only with your consent.
- **Marketing cookies** from YouTube. Some pages contain videos from our YouTube channel. YouTube (Google) places cookies that can track your viewing behaviour, including for advertising. We only load these videos once you have consented to marketing cookies.

6.2. On your first visit, we ask for your consent via the cookie banner. Refusing is as easy as accepting and does not affect your use of the website. You can change your choice at any time via the cookie icon on the website.

6.3. An up-to-date overview of all cookies, with their name, provider, purpose and retention period, can be found in the cookie overview, which you can open via the cookie banner.

7. Security

We protect your data with appropriate technical and organisational measures, such as secure connections, passwords and two-factor authentication, and restricted access. We ask our partners to treat data confidentially and to delete it after the trip.

8. Your rights

8.1. You have the right to access your data, to have it rectified or erased, to restrict its processing, to object to processing based on legitimate interests, and to receive your data in a commonly used format (data portability). If you have given consent, you can withdraw it at any time; this does not affect processing that has already taken place.

8.2. Send your request to info@cvatravel.com. We will respond within one month. To prevent misuse, we may ask you to verify your identity.

8.3. If you are not satisfied with how we handle your data, please let us know. You can also lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens, autoriteitpersoonsgegevens.nl).

9. Changes

We may amend this privacy notice. The current version is always available on cvatravel.com. In the event of significant changes, we will inform customers with an existing booking by email.

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