

INTRODUCTION

This privacy notice presents the information regarding how we gather and handle your personal information when you visit our website and engage in email communications via <https://www.agaadventuresltd.com>. This includes any data you provide during the purchase of a product or service, subscription to our newsletter, download of user guides, or participation in a prize draw or competition.

By providing us with your data, you confirm that you are above 13 years of age.

In this privacy notice, we, AGA Adventures Ltd, act as the data controller and assume responsibility for your personal data, referred to as "we," "us," or "our."

Contact Details

Our comprehensive information is as follows:

Legal entity: AGA Adventures Ltd

Email address: agaadventuresltd@gmail.com

Postal address: 128 City Road London, EC1V 2NX, UK

If you have any concerns about how we collect and use your data, you have the right to file a complaint with the Information Commissioner's Office (ICO), the UK regulatory authority for data protection matters (www.ico.org.uk). We kindly request that you contact us first with any complaints so that we can attempt to resolve the issue for you.

It is crucial that the information we hold about you is accurate and current. Please inform us if there are any changes to your personal information by emailing us at agaadventuresltd@gmail.com.

2. WHAT DATA DO WE COLLECT ABOUT YOU

We may collect and process various types of personal data about you, which may include:

- Transaction Data: This includes details about payments between us and any other relevant purchase information made through our platform.
- Technical Data: This encompasses internet protocol (IP) addresses, browser type and version, time zone settings, location, operating system and platform, and other technological information from the devices you use to access our website.
- Profile Data: This may include details of your purchases or orders, interests, preferences, feedback, and responses to surveys.
- Usage Data: This includes information about how you interact with our website, products, and services.

- Marketing and Communications Data: This incorporates your preferences regarding receiving marketing communications from us and our third parties, as well as your communication preferences.

We may also use Aggregated Data derived from your personal data. However, such data does not reveal your identity and is not considered personal data in and of itself. For example, we may analyse your Usage Data to determine the percentage of website users utilizing a specific feature. If we combine the Aggregated Data with your personal data in a manner that allows identification, it will then be treated as personal data.

Sensitive Data

We do not collect any Sensitive Data about you. Sensitive data refers to information relating to your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, health, genetic, or biometric data. Additionally, we do not collect any information relating to criminal convictions or offenses.

Please note that if you fail to provide us with the necessary personal data required by law, we may be unable to fulfil a contractual obligation (e.g., delivering goods or services). In such cases where you don't provide requested data, we will inform you promptly and may need to cancel a product or service you have ordered.

3. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
 - order our products or services;
 - subscribe to our service or publications;
 - request resources or marketing be sent to you;
 - enter a competition, prize draw, promotion or survey;
 - or give us feedback.
 -
- **Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies. We may also receive Technical Data about you if you visit other websites that use our cookies. Please see our cookie policy at <https://www.evertrek.co.uk/cookie-policy/> for further details.

- **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below
 - analytics providers such as Google based outside the EU;
 - advertising networks Google Adverts based outside the EU;
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at agaadventuresltd@gmail.com.

Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at agaadventuresltd@gmail.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity

To register you as a new customer

Type of Data

(a) Identity

(b) Contact

Lawful basis for processing

Performance of a contract with you

Purpose / Activity

To process and deliver your order including:(a) Manage payments, fees and charges
(b) Collect and recover money owed to us

Type of Data

- (a) Identity
- (b) Contact
- (c) Financial
- (d) Transaction
- (e) Marketing and Communications

Lawful basis for processing

- (a) Performance of a contract with you
- (b) Necessary for our legitimate interests to recover debts owed to us

Purpose / Activity

To manage our relationship with you which will include:(a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey

Type of Data

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Marketing and Communications

Lawful basis for processing

- (a) Performance of a contract with you
- (b) Necessary to comply with a legal obligation
- (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services

Purpose / Activity

To enable you to partake in a prize draw, competition or complete a survey

Type of Data

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications

Lawful basis for processing

- (a) Performance of a contract with you
- (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business

Purpose / Activity

To administer and protect our business and our site (including troubleshooting, data analysis, testing)

Type of Data

- (a) Identity
- (b) Contact
- (c) Technical

Lawful basis for processing

- (a) Necessary for our legitimate interests for running our business. To prevent fraud.
- (b) Necessary to comply with a legal obligation

Purpose / Activity

To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising

Type of Data

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications
- (f) Technical

Lawful basis for processing

Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy

Purpose / Activity

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences

Type of Data

- (a) Technical
- (b) Usage

Lawful basis for processing

Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy

Purpose / Activity

To make suggestions and recommendations to you about goods or services that may be of interest to you

Type of Data

- (a) Identity
- (b) Contact
- (c) Technical
- (d) Usage
- (e) Profile

Lawful basis for processing

Necessary for our legitimate interests to develop our products/services and grow our business

Marketing communications

You will receive marketing communications from us if you have:

1. requested information from us or purchased goods or services from us; or
 2. if you provided us with your details and consented for us to send you marketing communications; and
- in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by emailing us at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at agaadventuresltd@gmail.com.

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Other companies in our group who help fulfil our tours and trips outside the EU.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Countries outside of the European Economic Area (EEA) do not always offer the same levels of protection to your personal data, so European law has prohibited transfers of personal data outside of the EEA unless the transfer meets certain criteria. Many of our third parties service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

- Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:
- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

Please email us at agaadventuresltd@gmail.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.

- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at agaadventures@gmail.com

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

11. COOKIES

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.evertrek.co.uk/cookie-policy/>

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