# PRIVACY STATEMENT



Collecting, using and managing personal information

2020-01-27

#### INTRODUCTION

Your privacy is important to us. This is something every notice like this always says but we would like to ensure you that we really mean it. You are putting a lot of trust in Cuttlefish by using our services and we value this trust high and are committed to protecting any personal data you provide us.

This document describes how we use and process your personal data. We hope we have managed to make it clear and straightforward but if we have failed doing this, or if you simply would like to know more – please contact us! Our contact details are provided in the end of this document.

Cuttlefish offers travel services through our own websites, online booking systems and other platforms such as partner websites and social media. We also provide our services through manual inquiries and reservations over phone, e-mail, social media and other communication channels.

This Privacy Statement applies to any kind of information we collect through these platforms or channels. If you disagree with this Privacy Statement, we will need to ask you to not proceed using our services.

## PERSONAL INFORMATION FROM OUR TRAVELERS

The following section describes privacy related to individuals participating in our trips, arrangements or events.

## Different roles you as an individual could have with Cuttlefish

You and we could have different types of relationships. If you for example enter an agreement with us over providing you a single travel component (such as a night in a hotel room) or a packaged travel arrangement (travel, lodging and possibly other components combined) – then you will be a "customer" with Cuttlefish. Your accompanying friend or spouse not having a contractual relation with us will have the relation to Cuttlefish as a "traveler".

If you are invited to a company conference event or incentive trip by your employer, the business has the customer–supplier relationship with Cuttlefish while you and your colleagues have a relationship with us as being a traveler.

We only process information about children with the consent of the parents or legal guardians or when the information is provided to use by the parents or legal guardian.

#### What kind of personal data does Cuttlefish collect?

In order to assist you with our services and book your trip, some of your personal information needs to be provided to us. This information is typically the basics – such as for example your full name, e-mail address and other contact details, together with details of anybody travelling together with you.

Privacy Statement Page 1(4)



## Why does Cuttlefish collect and use your personal data?

The main reason we ask you for personal details is for administering your travel with included components, such as lodging, meals, car rentals, transfers and possibly also activities. For example, in order to book you a hotel room or make a reservation on an airplane we will need to provide your personal information to the supplier of these services.

In addition to basic personal information, more details may sometimes be collected for the purpose of tailoring and personalizing your trip. This is for being able to make the arrangements according to your wishes and desires, for example making reservations for specific activities requiring knowledge about your sex and age.

Cuttlefish strive to minimize the amount of personal information collected from you, but this will often weigh against our abilities to provide you with a good level of service. An example is when we collect information about nationality and home address from travelers in a large company group, simply for making the hotel check-in a quick and smooth procedure.

#### Does Cuttlefish require any sensitive personal information from me?

Cuttlefish will always try to limit collection of personal information that is to be considered "sensitive". Depending on the travel arrangements Cuttlefish is delivering to you, also some sensitive information might however be required. Below are listed a few examples on sensitive information and when this could be required:

- Passport nationality and number requested by transportation companies such as airlines when flying outside of EU or Schengen member states
- Allergies and dietary restrictions for being able to prepare your dining experience at restaurants according to your needs
- Other health related information such as height/weight and medical conditions for certain activities requiring preparations of safety equipment

## How does Cuttlefish share your data with third parties?

The primary purpose of collecting your data is to share the data relevant for your upcoming travel with the providers of services constituting your trip. We may also share your data if we are required by applicable law, governmental or other authorities. We do not sell or rent your personal data and the purpose of sharing your information is always only for delivering you a travel experience.

We always limit the personal information about you that we provide to our travel suppliers. Hotels, restaurants, car rentals and others are always only receiving from us the minimum set of required information about you and your travel company.

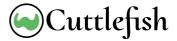
Cuttlefish may assist you and the providers of travel components to exchange requests and information about the travel services included in your trip.

#### How can you control the data you have given to Cuttlefish?

You always have the right to review the personal data we keep about you. You can request an overview of your personal data by emailing us to the address listed below.

#### What security does Cuttlefish use to safeguard your personal data?

We use appropriate and adequate technology and procedures to prevent unauthorized access to, and misuse of, personal data that we process. All personal data is protected through encryption mechanisms during transit. Sensitive information is stored encrypted in our systems.



## For how long is your personal information stored at Cuttlefish?

Basic information about our customers and travelers need to be kept for a specific time due to legislative requirements and for compliance with agreements with our insurance companies. We are keeping complete records about our traveler's names and contact information for the number of years specified by the Swedish tax agency.

Information categorized as sensitive, such as personal identification numbers, passport numbers, health information and details about dietary needs is being deleted at most 30 days after the end of the travel arrangement. Personal information not falling into the category of being sensitive are stored in our records for 365 days for then being deleted on a yearly basis.

# PERSONAL INFORMATION FROM OUR WEBSITE VISITORS

In addition to personal information for customers and travellers, Cuttlefish is also sometimes collecting information from visitors of our websites under special circumstances listed below.

## Contact Forms and Requests for Information

On our website www.cuttlefish.se we are providing several forms for both visitors asking to be contacted and for users requesting and/or downloading specific information. In order for us to get in contact with you or being able to provide you specific information, we will need some of your personal information.

In addition to your personal information, we also collect your permission to contact you directly – either explicitly or by presenting you with a clear statement on your consent by posting the request.

## **Newsletter Subscription**

Cuttlefish offers an e-mail-based newsletter that is sent out with regular intervals. The newsletter is open to anyone interested in receiving our updates on e.g. articles, travel industry news and offerings.

In addition to collecting your personal information needed to deliver the newsletter, we also require your permission to contact you using a one-to-many communication. You may at any time end your subscription to the newsletter.

#### Withdrawal of Your Consent

You are of course free to withdraw your consent at any time. Please contact us using e-mail or by phone and we will immediately update our records.

# USE OF COOKIES

Cookies are small pieces of textual information possible to apply to a page or response from a web server that may persist in the visitor's web browser. By presenting this information to the same or other web resources upon subsequent visits, information about the client may be tracked.

The following cookie policy is applied to our web and communicated on our website www.cuttlefish.se:

This website stores cookies on your computer. These cookies are used to collect information about how you interact with our website and allow us to remember you. We use this information in order to improve and customize your browsing experience and for analytics and metrics about our visitors both on this website and other media. To find out more about the cookies we use, see our Privacy Policy.



If you decline, your information won't be tracked when you visit this website. A single cookie will be used in your browser to remember your preference not to be tracked.

Cuttlefish uses analytical services from HubSpot, Google and Facebook.

# **CONTACT DETAILS**

If you find anything in this privacy statement unclear or would like to get more information from us regarding our management of personal data, please send us an e-mail to info@cuttlefish.se or give us a call on +46 (0)8 - 4373 2600.