

# SAKURA Voyages - Data Protection Policy

## 1. Who is responsible for your data?

Our Privacy Policy applies to the personal data that SAKURA Voyages S.à r.l. collects and uses.

References made in this Privacy Policy to either “Sakura-Voyages”, “we”, “us” or “our” mean SAKURA-Voyages S.à r.l. (a company with registration no. B91009 and registered office at 2, rue Hansgoergerfeld, L-7635 Ernzen).

We control the ways your personal data are collected and the purposes for which your personal data are used by SAKURA Voyages as we are the “data controller” for the purposes arising from Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, which enters into force on 25 May 2018 (hereinafter “the Regulation”).

## 2. Personal data we collect about you

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. Your personal data may include for example your name, your contact details, information relating to your travel itinerary (e.g. your booking reference number) or information on how you use our website and you interact with us.

We collect some personal data from you, for example when you book a trip with us, use our website or use our services or contact us. We may also receive your personal data from our suppliers who provide services to you on our behalf (for example when you provide feedback on our services), our partners when you purchase their travel related products or third parties who act on your behalf, for example travel agents or other parties who book a trip for you. If you book a trip on behalf of someone else, you must have their consent to use their personal information.

For more information on the parties who may share your personal data with us, please see section 8 below.

### Categories of data we collect

We may collect and process the following categories of information about you:

Your name and surname and your contact details (email address, telephone number and postal address)	When you book a trip or When you choose an offer we make available on our website
Information about your bookings and your travel itinerary, if you require special assistance or if you have specific dietary requirements. This information may include any changes to your bookings and travel products that relate to your booking (for example if you purchase travel insurance, rent a car or book a hotel along with your travel booking).	When you book or manage your travel plans

Information about your health, if you have a medical condition that may affect your trip (please see section “Sensitive personal data” below for more information)	When you provide us with this information before you fly or embark on trips
Information about other passengers in your booking, and the age range of any children traveling with you.	When you make a booking on behalf of other passengers
Information about your transaction, including your payment card details	When you purchase SAKURA Voyages products or services
Advance Passenger Information. This information includes your full name, your nationality, your date of birth, your gender (where required) – the number and type of your travel document (e.g. passport or ID), its expiry date and country of issue	When you check in for specific travel routes
Information related to your trips and our services in connection with your trips (e.g. auto-bag drop service, declaring lost luggage)	When you book a trip via SAKURA Voyages
Information about your purchases of our partners’ travel related products and services	When you purchase such products or services
The communications you exchange with us (for example, your emails, letters, calls, or your messages on our online chat service)	When you contact SAKURA Voyages or you are contacted by SAKURA Voyages
Your posts and messages on social media directed to us	When you interact with us on social media
Your feedback	When you reply to our requests for feedback or participate in our customer surveys
Information about how you use our website, such as your searches for trips	When you navigate on our website

### Sensitive personal data

In the course of providing services to you, we may collect information that could reveal your racial or ethnic origin, physical or mental health, religious beliefs or alleged commission or conviction of criminal offences. Such information is considered “sensitive personal data” under the Regulation and other data protection laws. We only collect this information when you have given your explicit consent, when it is necessary, or when you have deliberately made it public.

For example, we may collect this information in the following circumstances:

For your safety, when you have a specific medical condition, you will need to inform us of that and –where required – provide us with a medical certificate.

If you request special assistance during a trip, this could reveal information about your health (for example if you ask for a wheelchair). If you inform us about specific dietary requirements you may have, this could potentially indicate that you have specific religious beliefs. Also, when you provide us with your travel document details, your nationality may imply your racial or ethnic origin.

By providing any sensitive personal data you explicitly agree that we may collect and use it in order to provide our services and in accordance with this Privacy Policy.

If you do not allow us to process any sensitive personal data, this means we may be unable to provide all or parts of the services you have requested from us.

### 3. How and why we use your personal data

We use your personal data for the following purposes:

- **To manage your travel bookings and provide our services to you**

When you are embarking on a trip with us, we use your information to perform our services in relation to your trip, for example to issue your tickets, check you in, issue your boarding pass in the event of a trip, take you safely to your destination. We also use it to change your travel bookings if you request such changes.

- **To communicate with you and manage our relationship with you**

Occasionally we may need to contact you by email and/or SMS for administrative or operational reasons, for example in order to send you confirmation of your bookings and your payments, to inform you about your travel itinerary, to advise you of disruption and changes to your travels. Please be aware that these communications are not made for marketing purposes.

We will also use your personal data if we contact you after you have sent us a request, filled in a web-form through our website.

Your opinion is very important to us, so we may send you an email or SMS to seek your feedback.

We will use the communications you exchange with us and the feedback you may provide in order to manage our relationship with you as our customer and to improve our services and experiences for customers.

- **To personalise and improve your customer experience**

We may use your personal data in order to tailor our services to your needs and preferences and to provide you with a personalised customer experience. For example, if you inform us about your preferred travel destinations.

We may also collect information on how you use our website, which pages of our website you visit most, in order to understand what you like. We may use this information to tailor the content and offers that you see on our website and, if you have agreed to receiving marketing communications, to send you relevant messages that we think you like.

- **To inform you about news and offers that you may like**

We may send you marketing communications for our trips and travel products, if you have indicated that you wish to receive these, for example when you make a booking with us and you do not express a wish to not receive such communications. If you wish to receive marketing communications, we will provide you with news from us such as new products that you may be interested in or offers that you may like.

In addition, we will also send you communications promoting our partner's products and services that may relate to your travel arrangements, if you have indicated that you wish to receive these.

Please note that we will not share your contact details and other personal data with these partners or other companies for marketing purposes.

If you do not want to hear from us about our or our partners' products and services, you can simply tell us so by choosing the relevant option before confirming your booking.

- **To improve our services, fulfil our administrative purposes and protect our business interests**  
The business purposes for which we will use your information include accounting, billing and audit, credit or other payment card verification, fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance and development.
- **To comply with our legal obligations**, for example, our obligation to provide your information to national authorities where necessary.

#### 4. Requesting access to your personal data

You have a right to request access to the personal data that we hold about you. This could include booking information relating to trips you have taken with us.

If you would like to request a copy of your personal data or have any questions in relation to your personal data kindly send a mail to the address found under point 11 'Contact Information'.

#### 5. Security of your personal data

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data.

This means that we adhere to high security standards in order to protect your payment card details when you share such details with us.

As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where SAKURA Voyages discloses your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data; however in some instances we may be compelled by law to disclose your personal data to a third party, and have limited control over how it is protected by that party.

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party. We may also allow access to your information by other third parties who act for us for the purposes described in this Privacy Policy or for other purposes approved by you. Your personal data may be accessed by and processed outside the European Economic Area (the European Economic Area being the European Union and Iceland, Liechtenstein and Norway, also referred to as the "EEA"). Where your personal data are transferred outside of the EEA, we require that appropriate safeguards are in place.

We will retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Policy or in order to comply with the law.

#### 6. Notification In the event of a breach of your personal data

In the unlikely event there is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data (such as sending personal data to an incorrect recipient, or loss of availability of personal data), we are committed to taking an informed decision on whether to notify the supervisory authority within 72 hours and yourself in the event the personal data breach is likely to result in a high risk to your rights and freedoms, with undue delay.

## 7. Cookies or other tracking technologies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, we may use technologies, such as cookies, pixels or tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website.

## 8. Sharing your personal data

We may share some of your personal data with, or obtain your personal data from, the following categories of third parties:

- **Airports, government authorities, law enforcement bodies** and regulators when this is necessary to get you to your destination or is required by law. For example, for specific travel routes we are required by law to provide border control agencies with information that relates to your travel documents and to your travel itinerary. This information is known as Advance Passenger Information.
- **Credit and debit card companies.** SAKURA Voyages shares some of your personal data, which includes information about your method of payment and trip booking, to the credit or debit card company that issued the card you used to make your booking. In order to ensure the security of your transactions and prevent or detect fraudulent transactions, we may also share your information with our fraud screening partner.
- **Our partners who offer travel related products and services on our website, promote offers on our website.**

From time to time, we make certain third party offers available through our website. If you choose to purchase products or services offered on our websites by third parties, accept offers, some of your personal data, such as your contact details and your billing information, may be directly collected by or disclosed to that third party. As such, if you purchase their products or services, your information may be collected by or transferred to such parties. Note: Our partners have their own privacy policies and terms of use over which SAKURA Voyages does not have control. Whilst SAKURA Voyages carefully selects these partners, it has no responsibility or liability for their privacy policies, terms of use or the way they process your personal data. Please ensure that you review the relevant privacy policies and terms of use of these partners prior to purchasing their goods or services, using their websites, apps or services or providing any personal data to them.

- **Authorities**

We may disclose your personal data when this is required by the law of any jurisdiction to which SAKURA Voyages may be subject. Through our website we provide links to third party websites which are subject to separate Privacy Policies. Please be aware that this Privacy Policy does not apply to such websites and SAKURA Voyages is not responsible for your information that third parties may collect through these websites.

## 9. Your rights

To summarise, you are entitled to the following rights granted to you by the Regulation, namely:

- right to access your personal data supplied and, where applicable, obtain a copy of these data
- right to request that your data is rectified or corrected if you find them incomplete or incorrect
- right to have your data deleted, unless there is a legitimate reason to justify storing them

- right to object at any time to the processing of your data, unless a legitimate reason prevails over your interests and rights and freedoms
- right to request that the processing of your data be limited
- right to the portability of some data, i.e. the right to receive them in a structured format that is commonly used and machine readable so they may be sent to another “data controller”

We shall endeavour to respond to your request promptly and within one month of receipt of the request. Depending on the complexity of the request and the number of requests to handle, we have the ability to extend this response time by two months. You shall be notified of such an extension and of the reasons for the delay within one month of receipt of the request. We reserve the right to reject the request if it is unable to proceed to your identification or if it deems the request excessive or unfounded. You shall be notified of the reasons for refusal within one month of receipt of the request. We may also require the payment of reasonable fees in the case of unfounded or excessive requests, especially if they are repetitive.

If you are not satisfied with the handling of your request, you may file a complaint with the Commission Nationale pour la Protection des Données (information available on the website [www.cnpd.public.lu](http://www.cnpd.public.lu)). If you are not satisfied with the processing of your personal data, you may submit a complaint by sending a message, letter or sending a mail to the address found under point 11 ‘Contact Information’.

## 10. Updates to our Privacy Policy

We may make changes to this Privacy Policy from time to time, including as part of the new European data protection legislation which will start to apply on 25 May 2018 (the “General Data Protection Regulation”) – we will update the Privacy Policy and we will publish on our website any new version of this Policy.

## 11. Contact information

Questions, comments and requests regarding this Privacy Policy shall be addressed to: [gdpr@sakura-voyages.eu](mailto:gdpr@sakura-voyages.eu).

24/05/2018