

Privacy Policy

World Challenge Expeditions' Privacy Policy sets out what information we collect, how we collect it, and what we do with it. Our Privacy Policy applies to you and is available on our website and through other channels. In all your dealings with us you must ensure that others you represent are aware of the content of our Privacy Policy and consent to your acting on their behalf.

INFORMATION ABOUT YOU

Your information

This refers to a combination of information such as your name, contact details, travel preferences and special needs/disabilities/dietary requirements that you supply us or is supplied to us, including your social preferences, interests and activities and any information about other persons you represent (such as those on your booking). Your information is collected when you request information from us, contact us (and vice versa), make a booking, use our website(s)/apps, link to or from our website(s)/apps, connect with us via social media and any other engagement we or our business partners have with you.

We will update your information whenever we can to keep it current, accurate and complete.

Our use of your information

(1) For the purpose of providing you with our services, including your flight, holiday, security, incident/accident management or insurance, etc., we may disclose and process your information outside the UK/EEA. In order for you to travel abroad, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your information for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. Some countries will only permit travel if you provide your advance passenger data (for example Caricom API and US secure flight data). These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate.

(2) We may collect and process your information for the purposes set out below and in our registration with the Office of the Information Commissioner, and disclose the same to our group companies for business purposes and also to companies and our service providers who act as "data processors" on our behalf, or to credit and fraud agencies (some of whom are located outside the UK/EEA). These purposes include administration, service, quality and improvement-related activities, customer care, product innovation and choice, business management, operation and efficiencies, re-organisation/structuring/sale of our business (or group companies), risk assessment/management, security, fraud and crime prevention/detection, monitoring, research and analysis, social media, reviews, advertising and marketing, loyalty programmes, profiling customer purchasing preferences, activities and trends, dispute resolution/litigation, credit checking and debt collection.

(3) Information (such as health or religion) may be considered "sensitive personal data" under the Data Protection Act 1998. We collect it to provide you with our services, cater to your needs or act in your interest, and we are only prepared to accept sensitive personal data on the condition that we have your positive consent. By booking with us you also agree for your insurers, their agents and medical staff to exchange relevant information and sensitive personal data with us in circumstances where we/they need to act on your behalf or in the interest of passengers or in an emergency.

If you do not agree to Our Use of Your Information above, we cannot engage/do business with you or accept your booking.

Marketing material

- (1) Using your information, we may from time to time contact you with or make available to you (directly or indirectly) information on offers of goods and services, brochures, new products, forthcoming events or competitions from our holiday divisions and our group companies. We will tailor the information you receive or see; this will enable us to make available to you more personalised and relevant communications. We may use innovative technologies and work with business partners to achieve this.
- (2) We will assume you agree to email when you make an e-booking or provide us with your email in other situations such as in-store, competitions, promotions, prize draws and social media.
- (3) If you do not wish to receive such information or would like to change your preference, please refer to point (2) of “Your Rights” below.

Your rights

- (1) On completing our Data Subject Access Request form, you are entitled to a copy of the information we hold about you (for a £10 fee) and to correct any inaccuracies.
- (2) You have the right to ask in writing not to receive direct marketing material from us. If available, you can amend your previous preference on our website(s), use our “unsubscribe email”, opt-out of personalised emails or refer to our literature containing instructions. Once properly notified by you, we will take steps to stop using your information in this way.
- (3) For a list of relevant brands, please send us your request.

Please write to World Challenge Expeditions Limited, Legal Department, Origin One, 108 High Street, Crawley, West Sussex, RH10 1BDL.

Foreign controls

Outside the European Economic Area (EEA), data protection controls may not be as strong as the legal requirements in this country.

USE OF TOOLS/“COOKIES” AND LINKS TO OTHER WEBSITES

If our contact and dealing with you is via our website(s) or other e-platforms where our advertising is displayed, cookies may be used. To find out more about the types of cookies on our website(s), how we use cookies, to disable them or to change your preference and more, please refer to the information provided on our website(s). Other e-platforms may have different options and instructions. By using our website(s), you consent to our use of cookies.

Our website(s) may contain links to third party websites or micro-sites not controlled or owned by us. For example, reference sites or ancillary products and services sites or websites owned by our sister companies. It is your responsibility to check the status of these sites before using them. Please read their applicable terms and conditions, etc. carefully.

MONITORING

To ensure that we carry out your instructions accurately, improve our service and for security and fraud, we may review, monitor and/or record: (1) telephone calls; (2) activities using CCTV in and around our premises; (3) transactions and activities at all points of contact; and (4) web, social media and app traffic, activities, etc. All recordings and derivative materials are and shall remain our sole property.

SECURITY STATEMENT

We have taken all reasonable steps and have in place appropriate security measures to protect your information.

CHANGES TO THIS POLICY

Any changes to this Policy will be either posted on our website, brochure and/or made available on request.

Privacy Policy: Canada

World Challenge Expeditions, Inc. (“World Challenge”) is a corporation carrying on business in Peabody, Massachusetts, USA. It is a provider of travel expedition services to students, including Canadian Students and their chaperones.

Consistent with our obligations to protect the safety of our travelers, we are dedicated to maintaining high standards of confidentiality with respect to the information that has been provided to us. These obligations apply to all employees, contractors and agents who provide services in connection with our delivery of services to our travelers. World Challenge is committed to protecting the privacy of your personal information. We have developed this policy and related procedures to comply with the Personal Information Protection and Electronic Documents Act. This Canadian federal statute sets out ten principles:

- Accountability
- Identifying Purposes
- Consent
- Limiting Collection
- Limiting Use, Disclosure and Retention
- Accuracy
- Safeguards
- Openness
- Individual Access
- Challenging Compliance

These principles govern our approach to respecting your privacy. World Challenge is responsible for personal information it holds or has under its control, including personal information it passes on to others with your permission. We have designated a Privacy Officer to ensure our compliance with legislation and this policy. Our Privacy Officer will receive and respond to your inquiries and complaints regarding the protection and privacy of your personal information, and deal with requests for access to your information.

What is personal information?

Canadian privacy legislation defines “personal information” broadly as information about an identifiable individual or as information that allows an individual to be identified. For the purposes of this policy, we rely on the definition used in the legislation. Generally speaking, personal information does not include what is considered business contact information: your name, title or position, business telephone or facsimile number, or business email address.

Appointment of privacy officer

World Challenge is responsible for the personal information it collects and holds. To ensure this accountability, we have developed this policy, and have appointed Marcus O’Neill as our Privacy Officer to support this policy.

Our Privacy Officer will receive and respond to your inquiries and complaints regarding the protection and privacy of your personal information, and deal with requests for access to your information.

Purposes for the collection of personal information

The purposes for which personal information is collected by World Challenge include:

- To understand any medical or physical limitations or challenges of our travellers that might affect their ability to participate in and enjoy all the benefits of our travel expeditions and related programs and to assist us to accommodate special needs of our travellers
- To assist in responding to any medical emergency or requirement that might arise on an expedition trip or at a related program or event
- To administer the duties and compensation of our contractors
- To administer the employment and compensation of our employees. (World Challenge will collect the name, address, date of birth, social insurance number of employees for taxation purposes)
- To meet requirements imposed by law

Collection, use and disclosure of personal information

Collection

Only information required for the purpose(s) identified will be collected. Only lawful means will be used to collect personal information.

Use and disclosure

Personal information will not be used or disclosed for purposes other than those specified, except where required by law or to protect the interests of World Challenge against criminal activity, fraud, and material misrepresentation.

Use of Cookies and Non-Personally Identifiable Information

To help make our website more responsive to the needs of potential clients and other visitors, we invoke a standard feature found in browser software, called a “cookie”, to assign each visitor a unique, random number; this is an anonymous user identification that resides on your computer. The cookie does not identify the visitor, nor will we know who you are, even if we assign a cookie to your computer. A cookie cannot read data off your hard drive.

World Challenge keeps records of certain non-personally identifiable information such as the number of hits a Web page receives, Internet Protocol (IP) address, and other aggregate data. We do not link this aggregate data with any personal information. Third parties that help us administer our Web site may have access to this non-personally identifiable, aggregate data.

World Challenge may also obtain non-personally identifiable data from clients’ computer systems to assist World Challenge in evaluating its clients’ information and to allow World Challenge to fulfill its mandate. As noted above, if personal information is to be gathered from any other source, including clients, appropriate steps will be taken by World Challenge.

IP Addresses

Our Web servers automatically collect limited information about your computer’s connection to the Internet, including your IP address, when you visit our site. (Your IP address is a number that lets computers attached to the Internet know where to send you data - such as the Web pages you view.) Your IP address does not identify you personally. We use this information to deliver our Web page to you upon request, to tailor our site to the interests of our users and to measure traffic within our site.

You should note that our site may include links to other Web sites whose privacy practices we do not control. Once you leave our servers (you can tell where you are by checking the URL in the location bar on your browser), use of any information you provide is governed by the privacy policy of the operator of the site you are visiting. These parties may have privacy policies and practices that differ from ours. If you cannot find the privacy policy of any of these sites via a link from the site's homepage, you should contact the operator of the site directly for more information. We encourage everyone to be proactive in understanding how his or her information is collected and used online.

Consent to collection, use and disclosure

Subject to legal and contractual requirements, you may grant, refuse or withdraw your consent to the use, storage or disclosure of your personal information for certain of the identified purposes at any time by contacting World Challenge's Privacy Officer. If you refuse to consent or withdraw your consent, we may not be able to provide to you, or continue to provide to you, certain services or information or to accommodate you on a travel expedition. If you provide World Challenge or our service providers and agents with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from that person to enable us to collect, use and disclose the personal information provided for the purposes set forth in this Privacy Policy.

There are circumstances where collection, use or disclosure may be justified or permitted, or where we are obliged to disclose personal information without your consent. These circumstances could include:

- Where the information is publicly available
- Where we are required to do so by law or by order of a court or tribunal
- Where we believe, upon reasonable grounds, that there is an imminent risk to an identifiable person or group of death or serious bodily harm
- Where it is alleged that a member, associate or employee of World Challenge is guilty of a criminal offence, or is civilly liable in a legal action or other misconduct
- Where it is necessary to establish or collect fees

In these circumstances, we will not collect, use or disclose more personal information than is required.

Storage, security and protection of personal information

World Challenge endeavours to maintain appropriate physical, procedural and technical security over our offices and information storage facilities so as to prevent any unauthorized access, disclosure, copying, use or modification of personal information. Your personal information may be stored in secured physical locations and on computer network servers controlled by World Challenge located either at our offices or at the offices of our service providers. To help protect the confidentiality of your personal information, World Challenge employs physical, administrative and technological safeguards appropriate to the sensitivity of your personal information. For instance, we use secure computer data networks protected by industry standard firewalls and password protection systems. In addition, where personal information is sent to a third party for processing, we make sure, through our arrangements with them, that all personal information is kept secure.

Retention

It is our practice to retain our files, and the personal information contained therein for a reasonable period of time. This retention policy was developed due to tax, regulatory and business needs, as well as for the benefit of our clients. We will keep personal information only as long as it is necessary, including for the purposes of completing our services or as required by law. When the personal information is no longer required, it will be shredded or otherwise deleted or destroyed.

Access and accuracy

Upon receiving a written request, and subject to any applicable exemptions, World Challenge will inform you of its then currently-held version of your personal information and will give you access to that information and the opportunity to correct any errors in it. Access requests should be sent to our Privacy Officer, using the contact information provided below.

World Challenge endeavours to maintain the accuracy of all personal information on active matters. Personal information contained in closed files is not actively updated or maintained.

We encourage our clients, contractors and consumers participating in any of our market research efforts to notify World Challenge of any changes to their personal information we have in our possession.

Changes to the Privacy Policy

World Challenge reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our website and, if requested, provide a physical copy to you. However, World Challenge will obtain the necessary consents required under applicable privacy laws if it seeks to collect, use or disclose your personal information for purposes other than those to which consent has been obtained unless otherwise required or permitted by law.

Questions and Further Information

World Challenge has appointed Marcus O'Neill as its Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. In the event of any questions concerning the management of your personal information, or if you have general questions regarding our privacy practices, please contact him at:

Marcus O'Neill
School Account Manager
647 625 6912