

Café Ciclista Privacy Policy

At Café Ciclista (“Café Ciclista”, or “we”, “us”) we always aim to be as transparent, accessible and straightforward as possible. This includes how we handle your personal information. We try to be completely clear about how we use your information, to give you choices about how we use it, and to ensure its security.

1. POLICY OVERVIEW

This Privacy Policy concerns all the information that we collect, use and otherwise process about you as a customer, potential customer or just enquirer (whether as a direct booker, agent booker, website visitor, app user, booker by telephone, job applicant or otherwise).

We’ve approached our Privacy Policy with brevity and clarity in mind. We haven’t provided lengthy detail of all aspects of our collection and use of your information and any specific examples we provide aren’t intended to be comprehensive lists. We’re happy to provide any additional information or explanation needed and/or answer any questions you may have.

We keep this Privacy Policy under regular review to make sure we’re being transparent about how we use your personal information. Any changes to our Privacy Policy will be reflected at <https://cafeciclista.com/about/privacypolicy>.

2. ABOUT US

We are Café Ciclista, registered in Spain under number X6298216B. You’ll find our registered address below.

For the purposes of data protection laws, we are the “**data controller**” of all personal information that we collect, use and/or otherwise process about you under this Privacy Policy. If you have any questions about this Privacy Policy or the ways in which we handle your personal information, please contact us as follows:

Café Ciclista
Address: Ctra Las Marinas, 12, (KM 1), Denia, Alicante, 03700
Email: info@cafeciclista.com

3. WHAT INFORMATION DO WE COLLECT ABOUT YOU?

The type of information we collect about you depends on the nature of your interactions with us. Depending on the circumstances, we collect any of the following:

- **Details about you.** Your name, email address, address, telephone number, date of birth, dietary requirements and, if necessary, information about your health to the extent that it’s relevant to your bike hire or trip;
- **Identification documents.** Your passport or identity card details including your passport number, the country in which your passport was issued and the expiry date if required for entry to sportives or other reasons;
- **Details about the services you arrange with us.** Your bike hire and travel details, including details of your travel itinerary, your booking information, details of trips booked through us, details of any special assistance you might need from us and any other information relevant to enable us to provide you with the services that you’ve arranged with us;

- **Your interactions with us.** Information about your interactions or conversations with us and our people, including when you make enquiries, comments, complaints or submit feedback to us (whether formally via email or simply verbally to our people);
- **Job applications.** If you apply for a job with us, your CV, work history, educational details and the role you're applying for; and
- **Your use of our systems and services.** Details of the way in which you use our website, and/or social media pages.

4. HOW WE COLLECT INFORMATION ABOUT YOU

How we collect information about you will depend on how you interact with us and what services you arrange with us. Depending on the circumstances, we collect information in any of the following ways:

- When you book or search for a trip on our website (www.cafeciclista.com)
- When you apply for a job with us by email;
- When you contact us via phone, social media, post, email or instant messenger;
- When you sign up to receive email updates, participate in any of our competitions, promotions (for example via any social media channels, email or our site), surveys or market research;
- When you provide us with information about anything that occurred in connection with your bike hire or trip;
- When you attend any of our trips.

5. IN WHAT CIRCUMSTANCES DO WE NEED TO COLLECT YOUR SENSITIVE INFORMATION?

In certain circumstances, we will collect information that is deemed sensitive. This is most likely to include:

- Information about your health (for example if you ask us to provide you with special assistance during your holiday, or if you specify a meal preference that indicates a medical condition such as celiac disease); and/or
- Information about your religion (for example if you specify a dietary preference that indicates a particular religion such as a kosher or halal meal).

We seek to limit any sensitive personal data that we collect and, unless we have other specific lawful reasons to use this information (such as in an emergency situation), we will ask for your consent to collect it.

6. HOW WE USE YOUR INFORMATION

For what purposes do we use your information?

We'll use your information for a variety of different purposes, some of which will depend on the services that you engage us for. This includes:

- **To manage your booking with us.** We will use your information to provide you with any services that you request or purchase from us;
- **To send you service communications and support services.** We will use your information to send you any communications relevant to the services you've requested or purchased

from us. This includes sending you an email to notify you of changes to your itinerary, or providing you with a voucher, or booking confirmation. We will also provide you with customer service and support, deal with your enquiries, scheduling changes, complaints, comments or observations shared with us (on the basis of performing our contract with you or on the basis of our legitimate interests to provide you with customer service);

- **To send you marketing communications.** We will use your information to keep you up to date with the latest news, events, offers, and promotions that we think might be of interest or relevant to you, on the basis of you providing consent to receive these communications;
- **To provide assistance with online bookings.** We collect your information in order to complete your booking form for you, when you choose not to complete the form online yourself (where we have your consent to do so);
- **To process your job applications.** We will use your information to process any job applications that you submit to us (on the basis of our legitimate interest to recruit new employees or contractors);
- **To ensure security and protect our business interests.** In certain circumstances, we use your information to ensure the security of our services and people, including to protect against, investigate and deter fraud, unauthorised or illegal activities (on the basis of our legitimate interests to operate a safe and lawful business or where we have a legal obligation to do so);
- **To conduct research.** We use your information to carry out aggregated and anonymised research about general engagement with our services and systems, or if you choose to participate in customer surveys, consumer focus groups and research (on the basis of our legitimate interests to improve our products, services and customer service); and
- **To comply with our legal obligations.** In certain circumstances, we will need to use your information to comply with our legal obligations, for example to comply with any court orders or subpoenas (on the basis of our legitimate interests to comply with a legal obligation).

On what grounds will we process your information?

We will use your information for the purposes listed above, either:

- For the performance of your contract with us and the provision of our services to you;
- To comply with a legal obligation we have;
- For our legitimate interests (we explain what we mean by this below);
- To protect your vital interests;
- With your consent (please see below to see your rights in relation to consent that you provide to us);
- For establishing, exercising or defending legal claims; and
- For reasons of substantial public interest.

What do we mean by “legitimate interests”?

As outlined above, in certain circumstances we may use your personal information to pursue legitimate interests of our own or those of third parties, but this is provided your interests and fundamental rights do not override those interests. By “legitimate interests” we mean our interests in conducting and managing our business activities and to ensure that we are guaranteeing the best service and experience for you and our customers. This involves:

- Using your information to protect you against fraud when you transact on our site, and to ensure that our systems and sites are secure;

- Determining the effectiveness of our site / tools / services and improving the security and optimisation of our network, sites and services;
- Confirming information that you provide to us in a CV or application, by reference to past employers and/or publicly available employment or business profiles;
- Personalising, enhancing, modifying or otherwise improving the services and/or communications that we provide to you, such as sending you marketing and serving you with advertising that is relevant and likely to be of interest to you; and/or
- Detecting, monitoring and preventing fraud or other unlawful acts, and operating a safe and lawful business.

Where we use your information for our legitimate interests, we make sure that we take into account any potential impact that such use may have on you. Our legitimate interests don't automatically override yours, and we won't use your information if we believe your interests should override ours unless we have other grounds to do so (such as when we have your consent, or we have a legal obligation to use your information in that way). If you have any concerns about our processing please refer to details of the section on "YOUR RIGHTS" below.

As we outline in the "YOUR RIGHTS" section below, from 25 May 2018 you will have the right to object to our using your information for our legitimate interests. However, please keep in mind that your objection to this sort of processing may affect our ability to carry out the tasks that we have set out above.

7. WHO WE SHARE YOUR INFORMATION WITH

In connection with the purposes and on the lawful grounds described above, we share your personal information with the following third parties:

- **Third party suppliers that we work with to provide your booking and our other services to you.** This includes for example: hotels, transport companies, sportive operators;
- **Other third party suppliers that we work with in connection with our business.** We share your information with third party suppliers that provide us with services in connection with our business and the provision of our services to you. This includes for example: marketing agencies and/or companies that run our marketing campaigns, IT developers, service providers and hosting providers, third parties that manage promotions or competitions that we may run, third party software companies that provide us with applications on a white label basis, advertising providers and networks, site analytics providers and credit card screening companies;
- **Courts or advisors.** We share your information with other third parties (including legal, accountants or other advisors, regulatory authorities, courts and government agencies) where necessary to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law; and
- **Third parties which are successors of the business.** Your information may be disclosed to any successors of our business, in the event of a re-organisation, merger or sale, for them to use for the purposes as set out in this Privacy Policy.

Where we do share your information with third parties, we will require them to maintain appropriate security to protect your information from unauthorised access or processing, unless we have no ability to do so (for example, where we are sharing information with border agencies or enforcement authorities).

8. MARKETING

We will keep you up to date with our latest trips, offers and promotions, that we think might be of interest / relevant to you if you have indicated that you are happy to receive marketing communications from us – that is, if you have:

- Signed up to receive marketing communications from us and have not later told us that you don't want to hear from us.

If you no longer want to hear from us, you can opt out or unsubscribe by:

- Following the "unsubscribe" link contained in any marketing communications that you receive from us;
- By email to: info@cafeciclista.com

9. OUR SITE AND COOKIES

What we collect when you interact with our sites and apps

As you may already know, most sites and apps collect certain information automatically in log files about the way in which you interact with them. This might include your IP address, geographical location, device information (such as your hardware model, mobile network information, unique device identifiers) browser type, referral source, length of visit to the site or app, number of page views, the search queries you make, and similar information.

This information will be collected by us or by a third party site analytics service provider and will be collected using cookies.

We use this information to help improve our functionality and services, run diagnostics, analyse trends, track visitor movements and improving our services.

What do we mean by "cookies"?

Cookies are small amounts of information in the form of text files that we store on the device you use to access our site or our marketing communications. Cookies allow us to monitor your use of our services and improve them. For example, a temporary cookie is also used to keep track of your "session". Without that temporary cookie you will not be able to purchase holidays or other services via our site.

We also use cookies for site analytics purposes and to monitor how customers interact with and receive our marketing communications (for example if you open the marketing communication and/or click on any of our offers). We use this information to try to improve the relevance and tone of our future communications to ensure we're serving you as best as we can.

If you don't want cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings, please consult the "Help" section of your internet browser or visit <http://www.aboutcookies.org>. Please note that if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the site.

10. YOUR RIGHTS

You have certain rights in respect of the personal information that we hold about you, including:

- The **right to be informed** of the ways in which we use your information, as we seek to do in this Privacy Policy;
- The right to ask us **not to process your information** for marketing purposes;
- The right to **request access** to the information that we hold about you;
- The right to request that we **correct or rectify any information** that we hold about you which is out of date or incorrect;
- In certain circumstances, the right to **ask us to stop using information** about you; and
- The right to **lodge a complaint** about us

Please note that we reserve the right to retain certain information for our own record-keeping (for example, to ensure that you do not receive marketing communications that you have opted-out of receiving) and to defend ourselves against any claims. We may also need to send you service-related communications relating to the services that we provide to you even when you have requested not to receive marketing communications.

From 25 May 2018, you will have certain additional rights in respect of the information that we hold about you, including:

- The right to **withdraw consent** that you have provided to us to use your personal information;
- The right to **object** to our using your information on the basis of our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground; and
- The right to **receive a copy** of any information we hold about you (or request that we transfer this information to another service provider) in a structured, commonly-used, machine-readable format, in certain circumstances; and
- The right to ask us to **limit or cease processing or erase information** we hold about you in certain circumstances.

How to exercise your rights

- You can exercise your rights by contacting us by email (info@cafeciclista.com).
- If you wish to remove your information from our marketing circulation lists, which include receiving marketing emails, you can unsubscribe by scrolling to the bottom of the email and clicking the 'unsubscribe' link.
- We will comply with your requests unless we have a lawful reason not to do so.

Please be aware that we may need you to provide additional information (such as to confirm your identity and/or to confirm what information you wish to access) in order to process your request.

11. WHERE IS YOUR INFORMATION?

We are based within the European Economic Area (EEA).

12. HOW WE LOOK AFTER YOUR INFORMATION

We strive to constantly keep our security practices under review to make sure that we're keeping your information as safe as possible. We use a variety of different technical and operational security measures to protect your information against unauthorised access or unlawful use. For example we:

- Ensure the physical security of our office;

- Ensure the physical and digital security of our equipment, devices and systems by mandating appropriate password protection, encryption and access restrictions;
- Are a "PCI DSS" compliant company, meaning that we apply certain high standards of security in respect of your payment information;
- Ensure appropriate access controls so that access to your information is only granted to those of our people that need to use it in the course of their work;
- Maintain internal policies and deliver data protection and confidentiality training to make sure our people also understand their responsibilities in looking after your information and commit to taking appropriate measures to enforce these responsibilities.

Our site contains content and links to other sites that are operated by third parties. Please note that we do not control these third party sites or the cookies that such third parties operate and this Privacy Policy will not apply to them. Be sure to consult the Terms of Use and Privacy Policy of the relevant third party site to understand how that site collects and uses your information and to establish whether and for what purposes they use cookies.

13. HOW LONG WE KEEP YOUR INFORMATION FOR

We keep your information for as long as is reasonably necessary to enable us to provide you with the services that you have requested from us, to comply with any legal obligations that require us to keep information, or for as long as we reasonably require for our legitimate interests, including for example for the purposes of exercising our legal rights or defending ourselves against claims. We operate a data retention policy and look to find ways to reduce the amount of information we hold and the length of time that we need to keep it.

14. COMPLAINTS

Not happy?

If you have any comments, questions or concerns about the contents of this Privacy Policy or the way in which we use your information, we encourage you to contact us to see if we can help resolve the issue in the first instance.

However, if you'd still like to make a formal complaint or have concerns regarding the ways in which we use your information, you can contact the Information Commissioner's Office in your country.