

BLUE POPPY TOURS & TREKS

Privacy Notice

20 July 2018

Personal data relating to you is held under the provisions of the EU General Data Protection Regulation (“GDPR”) and any other applicable laws or legislation.

I. How your information will be used

Blue Poppy Tours & Treks (hereafter “we” or “Blue Poppy”) needs to collect, use, share and process data about you for the purpose of arranging your trip, including for flight and hotel reservations, payment arrangements and your visa application.

The information we hold and process will be used for purposes associated with the arrangements for your trip and to correspond with you. If you choose not to supply us with the required data we will not be able to make the necessary arrangements for you and your booking will not be confirmed.

The information we hold will have been provided by you and will not be obtained from other sources.

II. Personal data we may collect from you

Personal data is information that can be used directly or indirectly to identify you. The sort of personal data we hold includes:

- Name;
- Date and place of birth;
- Gender;
- Citizenship;
- Marital status;
- Occupation;
- Address;
- Email address;
- Phone number;
- Passport number;
- Passport copy (including photo);
- Bank account details;
- Travel arrangements

III. Special Categories of Data

We may need to collect, store, use and transfer the following special category of more sensitive personal data concerning you:

- information about your health, including any medical condition.

IV. Processing of your personal data

We use personal data only for the purpose of making the necessary arrangements for your booking, including flight and hotel reservations, payment arrangements and visa application. We use your email address and contact details to correspond with you and contact you as necessary in relation to your trip and occasionally in relation to post-trip feedback.

We will also need to share the data with hotels, banks, airlines and government offices for these same purposes.

We take care to protect your data and not to use it for any other purposes.

V. Transfers Outside the EEA

Blue Poppy is a company established in the Kingdom of Bhutan with a sales office in London. Please be aware that providing your personal details to Blue Poppy in the context of your trip means your data will be transferred to the Kingdom of Bhutan, where your personal data may not be given the same level of protection under the applicable law as it may have in your home country.

VI. Legal basis for the processing of personal data

If you reside within the EU, our processing of your personal data will be legitimised as follows:

- a. Whenever we require your consent for the processing of your personal data such processing will be justified pursuant to Article 6(1) lit. (a) GDPR. This article in the GDPR describes when processing can be done lawfully.
- b. If the processing of your personal data is necessary for the performance of a contract between you and us or for taking any pre-contractual steps upon your request, such processing will be based on Article 6(1) lit. (b) GDPR. If this personal data is not processed, we will not be able to perform under the contract with you.
- c. Where the processing is necessary for us to comply with a legal obligation, we will process your information on basis of Article 6(1) lit. (c) GDPR.
- d. And where the processing is necessary for the purposes of our legitimate interests, such processing will be made in accordance with Article 6(1) lit. (f) GDPR, for example to detect fraud.

VII. Retention of personal data

We will retain your personal data for as long as it is necessary to fulfill the purposes outlined in this notice.

Even though we may retain the personal data we collect from you beyond the date of your trip, you have the right at any time to require us to delete the data we hold on you.

VIII. Your rights

We take reasonable steps to ensure that your personal data is accurate, complete, and up to date. According to applicable data protection laws and subject to the specific requirements provided therein, you have the right to request Blue Poppy to access, correct, or delete the personal data that we collect, the right to object to further processing of your personal data, and the right to request us to send you your personal data in a structured and standard format. If you have provided consent for the processing of your data you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the supervisory authority if you believe that we have not complied with the requirements of the GDPR with regard to your personal data.

IX. Contact details

If you would like further information, if you have any concerns as to how your data is processed, or you would like to exercise one of your rights, you can contact the CEO, Choki Dorji at choki@bluepoppybhutan.com.