

# Privacy Notice

Last Updated: July 1, 2020

Welcome to the Abercrombie & Kent Privacy Notice. This Privacy Notice applies to U.S. residents and informs you about how we collect, use and share Personal Information when you visit our website, [abercrombiekent.com](http://abercrombiekent.com) and the related mobile application(s), or any website or application owned, operated, licensed, or controlled by Abercrombie & Kent USA, LLC (referred to in this Privacy Notice collectively as the “Site”), or otherwise interact with Abercrombie & Kent and our affiliated entities, including Abercrombie & Kent Ltd. or A&K Destination Management Companies. The Privacy Notice also tells you about your rights and choices with respect to your Personal Information.

This Privacy Notice is provided in a layered format so that you can easily click through to the specific areas set out below. Alternatively, you can download a PDF version of the Notice [here](#).

- 1. Definition of Personal Information**
- 2. Information That We Collect**
- 3. How We Collect Personal Information**
- 4. How We Use Personal Information**
- 5. When and How We Share Personal Information**
- 6. Your Choices and Access Rights**
- 7. Children**
- 8. Do Not Track**
- 9. Third Party Sites**
- 10. Information Security**
- 11. Information Retention**
- 12. Updates To This Privacy Notice**
- 13. Contacting Us**

**1. Definition of Personal Information.** Personal Information generally means any information that identifies you as an individual, and other information we associate with it. It does not include data from which your identity has been removed (anonymous data) or publicly available information, such as that information lawfully made available from governmental records.

**2. Information That We Collect.**

**Personal Information that we Collect.** We may collect, use, store, and, in some cases, share different kinds of Personal Information (and may have done so in the preceding 12 months), including:

- **Identity and Contact Information.** This includes data relating specifically to your identity and contact information, such as your name, email address, date of birth, address, and telephone number.
- **Financial Information.** This includes data relating to your means and methods of payment, such as your bank account and payment card details.
- **Transaction Information.** This includes data relating to the transactions you have carried out with us, such as details about payments to and from you, and other details of products and services you have purchased from us.
- **Technical Information.** This includes passively collected technical data, such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access the Site.
- **Usage Information.** This includes information about how you use the Site, our products, and services, such as the amount of time you spend reading a particular page.
- **Communications and Profile Information.** This includes our communications with you, such as your preferences in relation to whether you want to receive marketing materials. This also includes the data that we receive if and when you create a customer or careers profile on our Site and make use of that profile, such as your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Applicant Information.** In the case of prospective employees, we may also receive professional or education-related information in connection with your application for employment.
- **Special Categories of Personal Information.** During our interactions we may collect certain categories of Personal Information about you such as health related information or characteristics protected under state or federal law. This may be because you want us to have the information, for instance we are sometimes asked whether certain medication is allowed to be taken into certain jurisdictions, which may disclose a medical condition. We may also receive this information passively, as a result of a group you travel with, for instance if you are part of a group booking by a specific religious association.

**Aggregated Information.** We also collect, use, and share aggregated information such as statistical or demographic data for any purpose. Aggregated information may be derived from your Personal Information but is not considered Personal Information as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Information with other users to calculate the percentage of users accessing a specific feature of the Site.

**3. How We Collect Personal Information.** We use different methods to collect information from and about you, including through:

- **Direct Interactions.** You may give us your Identity, Contact, Profile, and Financial Information by filling in forms or by corresponding with us through the Site, by mail, phone, email, social media, or otherwise. This includes Personal Information you

provide when you: make a booking or request a quote for travel arrangements; subscribe to our newsletter or other publications; sign up for emails; enter a competition, promotion, or survey; give us feedback; use our online payment and client portals; or utilize our Careers page.

- **Automated Technologies or Interactions.** As you interact with the Site, we may automatically collect Technical Information about your equipment, browsing actions, and patterns. We collect this Personal Information by using cookies, or other similar technologies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly. For more information about the cookies we use and to set your preferences, please see our Cookies Preferences for details.
- **Third Parties.** We may receive Personal Information about you from various third parties. For example, your travel agent may book travel on your behalf through our Site, in which case your travel agent would supply us with your Identity, Contact and Financial Information. Or, you may interact with a third-party destination management company once you reach your travel destination, in which case they may provide your Personal Information to us in the course of fulfilling your holiday.

We may also receive technical data about you from third party analytics and advertising providers, such as Google or Facebook, and social media platforms.

Additionally, from time to time we may run competitions with third parties where we would collect data about you however, all participants have the option to opt in or out to receive any information from us.

**4. How We Use Personal Information.** We use Personal Information as permitted by law and for the following business purposes:

- Creation of itinerary and trip planning;
- To process and deliver your booking including: putting final itinerary together and adding additional requests; manage payments, fees and charges; and collect and recover money owed to us;
- To manage our relationship with you;
- To consider your application for employment;
- To request or enable you to participate in a prize drawing, competition, or complete a survey;
- To deliver relevant Site content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you;
- To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data);
- To use data analytics to improve our Site, products / services, marketing, customer relationships, experiences, and to make suggestions about goods or service that may be of interest to you; and
- Where we need to comply with legal or regulatory obligations.

**5. When and How We Share Personal Information.** We may share your Personal Information with the parties set out below, for the purposes set out at Section 4, above.

- **A&K Affiliates.** Abercrombie & Kent affiliates who are based globally and provide travel related services, such as A&K Destination Management Companies, IT and system administration, human resources related services, finance, and legal.
- **Service Providers.** These third parties include: service providers providing travel-related services in connection with bookings, e.g. airlines or third-party destination management companies; professional advisers including lawyers, bankers, accountants, auditors, and insurers; vendors, including information technology service providers, advertising, and recruiting; public and government authorities and regulators; and with research agencies to do demographic-type studies on our client base.
- **In Cases of Mergers and Acquisitions.** Third parties (and their advisors) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- **Third Parties.** We may share certain technical and usage information with third parties who provide us with digital advertising and website analytics services.

## 6. Your Choices and Access Rights.

**Opting Out of Marketing.** You can ask us to stop sending you marketing messages at any time by following the unsubscribe link in any marketing message sent to you, by contacting your A&K travel consultant at any time, or by sending an email to [datacompliance@abercrombiekent.com](mailto:datacompliance@abercrombiekent.com). If you opt out, you will still receive communications that are required as a result of a purchase of travel arrangements or other such transactions, and you may also receive important communications about us or the Site.

**California Privacy Rights.** California residents have certain rights under the California Consumer Privacy Act and other state laws.

- **Access Your Personal Information.** You may request the following information from us: (1) the categories of Personal Information we have collected about you; (2) the categories of sources from which the Personal Information was collected; (3) the business or commercial purpose for collecting or selling (if applicable) your Personal Information; (4) the categories of third parties with whom we shared Personal Information; and (5) the specific pieces of Personal Information we have collected about you.
- **Delete Your Personal Information.** You may request that we delete your personal information. Note that deletion requests are subject to certain limitations, for example, we may retain Personal Information as permitted by law, such as for tax or other record keeping purposes, if you have an upcoming reservation or to maintain an active account, and to process transactions and facilitate customer requests.
- **Do Not Sell Your Personal Information.** We will not disclose your Personal Information to third parties if we have received and processed a request from you not to do so. Please [click here](#) to opt out.

Please note that we may continue to share your Personal Information with our affiliates and service providers for essential purposes such as to: comply with law; investigate / prevent potential security incidents or fraud; facilitate the functionality of the Site; provide information to you related to your safety; enforce contracts between

us and you; protect our operations, rights, privacy, safety or property, security, and that of our affiliates; allow us to pursue available remedies or limit the damages that we may sustain.

- **Exercising Your Rights.** To exercise your access or deletion rights, [please complete this form](#) and email the form to [datacompliance@abercrombiekent.com](mailto:datacompliance@abercrombiekent.com), or contact us at 888-598-0661 for assistance. Note that we will not discriminate against you in service or price for exercising your rights.
- **Authorized Agent.** You may designate an authorized agent to submit a request on your behalf. We will require written proof of your agent's permission to act on your behalf, and will verify your identity directly.
- **Shine the Light.** California Civil Code Section 1798.83 permits you to request information regarding our disclosure of your personal information (if any) to third parties for the third parties' direct marketing purposes. To make such a request, please contact us [datacompliance@abercrombiekent.com](mailto:datacompliance@abercrombiekent.com).

**Nevada Privacy Rights.** Nevada law (NRS 603A.340) requires a business establish a designated request address where Nevada consumers may submit requests directing the business not to sell certain kinds of personal information that the business has collected or will collect about the consumer. If you are a Nevada consumer and wish to submit a request relating to our compliance with Nevada law, please contact us as at [datacompliance@abercrombiekent.com](mailto:datacompliance@abercrombiekent.com).

**7. Children.** This Site is intended for use by persons who are residents of the United States and who are 18 years of age or over. We do not knowingly collect Personal Information on the Site from children under age 18, but to the extent we may incidentally hold such information, for example as part of a family booking, those individuals and/or a parent or guardian may exercise privacy rights enjoyed under applicable law by contacting us as indicated in this Notice.

**8. Do Not Track.** We do not monitor or follow "Do Not Track" (DNT) signals because there is no standard interpretation or practice for DNT signals. Therefore, we handle all user information consistent with this Privacy Notice.

**9. Third Party Sites.** The Site may link to other websites, online services, or social media platforms, and such links are provided for your convenience only. If you decide to access any of the third party websites linked from our Site, you do so subject to the terms and conditions of use and privacy policies of those sites, services or platforms.

**10. Information Security.** We have put in place reasonable security measures to prevent your Personal Information from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed.

**11. Retention.** We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice, unless a longer retention period is required or permitted for legal, auditing, or compliance purposes.

**12. Updates To This Privacy Notice.** We may periodically update this Privacy Notice. Any changes to this Privacy Notice will become effective when we post the revised Privacy Notice on our Site. To the extent permitted by law, your use of this Site following these changes means that you accept the revised Privacy Notice.

**13. Contacting Us.** If you have any questions about this Privacy Notice or our data practices, please contact us by email at [datacompliance@abercrombiekent.com](mailto:datacompliance@abercrombiekent.com) or telephone 888-598-0661. Note that email communications are not always secure, so please do not include credit card information or other sensitive information in any email to us.