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PRIVACY NOTICE

Cancellation Upgrade

CANCELLATION UPGRADE

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1 Privacy Notice

1.1 Purpose and Scope of this Privacy Notice

This Privacy Notice¹ sets out the basis on which Your Personal Data is collected, used and stored when You become a Member that is protected under the Cancellation Upgrade cover.

Note: If You are providing Personal Data about another person, we require You to advise them of what information You've shared with Companjon, share this Privacy Notice with them and ensure that they have given You permission to provide this information to Companjon.

For the purposes of this Privacy Notice, the controller of Your Personal Data may be Companjon, the Insurer or GetYourGuide, or any two or more of these parties acting as joint controllers within the meaning of applicable data protection law.

Each of the parties has arrangements in place to ensure that Your Personal Data is handled correctly and in accordance with applicable data protection law. These arrangements reflect each entity's respective roles and responsibilities in relation to the services provided to You and the use of Your Personal Data. This means for example that certain processing of Your Personal Data may be carried out by one entity on its own or that certain processing is carried out by one entity under the instruction of another. Processing may also be carried out under joint controllership within the meaning of applicable data protection law. In any case, Companjon, the Insurer and GetYourGuide will always ensure that their respective obligations towards You are fulfilled, and Your data protection rights are fully protected.

This Privacy Notice applies to all Members. If You have any questions or comments about this Privacy Notice or want to exercise Your data protection rights, please contact Companjon's data privacy officer by e-mailing dpo@companjon.com. Companjon will deal with data protection queries or requests made by You in relation to Your Personal Data on behalf of the Insurer and GetYourGuide. You are also entitled to make such queries or requests directly to GetYourGuide or the Insurer who may in turn refer Your request to Companjon. In any event, the parties will ensure that your queries and requests are managed through the appropriate channel in accordance with Your data protection rights.

If You have any general questions or comments about this Cancellation Upgrade cover, please send an e-mail to customer@companjon.com.

1.2 Overview of this Privacy Notice

Your Personal Data is collected from You for the purposes of providing You with the Benefits You have as a Member. GetYourGuide Deutschland GmbH owns and operates the GetYourGuide Platform where You sign-up to become a Member. For the purposes of this Privacy Notice, GetYourGuide and Companjon may act as joint controllers of Your Personal Data.⁴³² Please note that GetYourGuide has its own separate terms & conditions and privacy notice relating to Your use of the GetYourGuide Platform and processing of Your data with which You should familiarise yourself. Companjon is not responsible for, and does not accept liability for, the terms & conditions, privacy notice or other terms of the GetYourGuide Platform to which You may be subject as part of Your GetYourGuide Booking.

1.3 What Personal Data Is Collected About You?

Companjon, GetYourGuide and the Insurer may collect and process the following types of Personal Data about You:

¹ Please see Membership Pack for definitions of capitalised terms

Personal Data	Details
Membership Data	<p>When You provide information required for becoming a Member, some or all of the following Personal Data is collected about You:</p> <ul style="list-style-type: none"> • Details about Your identity which includes Your title, full name, e-mail address and where applicable date of birth; • Details relating to Your GetYourGuide Booking which includes Your Booking number, Activity provider, activity name, activity start date/time, activity location. • Details about Your membership which includes Your membership number and the term of Your membership; • Details relating to Your internet protocol (IP) address used to connect Your computer to the internet for Your purchase. You must book Your Activity on the GetYourGuide Platform whilst located within an EEA country and Your IP address is used to verify this; and • GetYourGuide "tokenized" customer ID number which is the encrypted reference number associated with Your insurance membership.
Claims Data	<p>When a claim is made it is necessary for Companjon to collect and generate some or all of the following Personal Data about You (in addition to other data already collected):</p> <ul style="list-style-type: none"> • date of Your claim, • date and time of Your GetYourGuide Booking Cancellation; and • Payout amount.
Customer Support & Service Data	<p>When You submit a query or request in connection with Your membership, it is necessary to collect and generate the following Personal Data about You (in addition to other data already collected):</p> <ul style="list-style-type: none"> • The nature of Your query or request (e.g., customer support/troubleshooting request, membership cancellation request, refund request or membership amendment request); and • The date of Your query and request.
Direct Marketing Data	<p>If You choose to receive direct marketing communications, Your Personal Data relating to Your marketing preferences will be collected (e.g., a record of Your decision to receive direct marketing communications and/or any option You exercise to unsubscribe from receiving such communications).</p>

1.4 Why and How Is Your Personal Data Used?

The reasons **why** ("Legal Basis") and **how** ("Purposes") Your Personal Data is processed in the context of Your membership are explained in the table below.

Why (Legal Basis)	How (Purposes)
<p>To manage Your membership – contractual necessity</p>	<p>It is necessary to process Your Membership Data, Claims Data and/or Customer Service & Support Data to enter into and perform the membership contract with You, including:</p> <ul style="list-style-type: none"> • To manage the membership contract with You under the Membership Terms (e.g., assess Your eligibility, assess Your level of insurance cover, assess the price of Your insurance cover, and administer Your Benefits); • To assess and process any claims You make; • To process any customer service & support requests from You; and • To maintain and store records in relation to You/Your membership. <p>IMPORTANT: it is a contractual requirement for You to provide Your Membership Data, Claims Data and Customer Support & Service Data for the purposes set out above. If You do not provide such Personal Data that can be processed for these purposes, it will not be possible to manage Your membership and Your Benefits.</p>
<p>To serve the Members and the business interests of involved parties –our legitimate interests</p>	<p>It is necessary to process Your Personal Data for the purpose of pursuing Companjon's, the Insurer's and GetYourGuide legitimate business interests. The specific purposes of such legitimate business interests are detailed below.</p> <ul style="list-style-type: none"> • Provide a quote for the Membership Fee: Your Membership Data will be processed in order to provide You with a quote for the Membership Fee; • Information Security: Your Personal Data may need to be processed for the purposes of maintaining appropriate assurances that it remains secure. • Direct Marketing: In certain circumstances, Your Direct Marketing Data will be processed to send You marketing communications (e.g., about Companjon's other insurance products and services) when there is a legitimate legal basis. • Legal Claims: Your Personal Data may be processed in order to defend, establish, investigate and/or exercise a legal claim (or prospective legal claim) to which You are a party. • Fraud Prevention: Your Personal Data may be processed for the purpose of fraud or potential fraud prevention or detection. <p>Important: Before using Your Personal Data to pursue legitimate business interests, the impact of the processing activities is carefully considered against Your fundamental rights and freedoms.</p> <p>You have certain rights when Your Personal Data is processed on this basis, such as the right to object. For information about how to exercise this right, please see section Error! Reference source not found. of this Privacy Notice (What are Your data protection rights?).</p>
<p>To uphold the law - comply with legal obligations</p>	<p>Your Membership Data, Claims Data and/or Customer Service & Support Data may be processed where it is necessary to comply with legal obligations to which we are subject under any European Union Member State laws.</p>

Why (Legal Basis)	How (Purposes)
Where You have provided Your explicit consent	<p>Your Direct Marketing Data may be processed to send You marketing communications (e.g., about Companjon's other insurance products and services) when You have provided Your explicit consent to do so.</p> <p>Your Personal Data may also be processed on the basis of Your explicit consent in other limited circumstances.</p>

1.5 Transfers Of Your Personal Data And Other Recipients

Whenever Your Personal data is transmitted to external parties that process the data on behalf of Companjon, the Insurer or GetYourGuide it is contractually ensured that Your Personal data is transmitted and processed in compliance with all applicable data protection laws. These external parties (such as customer support functions, claims support, IT providers, marketing agencies, auditors, regulatory and government bodies etc.) are also legally obliged to process Your Personal data in compliance with applicable data protection laws.

Your Personal Data may be transferred to certain Recipients (e.g., IT service providers, security providers, cloud service providers, GetYourGuide Customer Services agents) who are located outside of the EEA in countries with laws and practices that do not contain equivalent data protection rights for Your Personal Data to those in the EEA. Where such transfers occur, Companjon, the Insurer and GetYourGuide ensures that appropriate safeguards and transfer mechanisms are in place to protect Your Personal Data. It is also ensured that such processing is performed in compliance with the European Data Protection Board's 'Recommendations on Supplementary Measures' (01/2020). If You would like to find out more about any transfers including how appropriate safeguards concerning Your Personal Data are employed, please send an e-mail to dpo@companion.com.

1.6 How Long Is Your Personal Data Kept?

The Retention of Your Personal Data is subject to certain minimum legal and regulatory retention periods. In consideration of this, Your Personal data is kept in line with the retention periods set out in the table below:

Personal Data	Retention Period
Membership Data, Claims Data and Customer Service & Support Data	7 years from the date on which Your Cancellation Upgrade membership expires. Where Your Personal data is collected and You do not enter into a membership agreement with Us, this Personal data is retained for no longer than 6 months.
Direct Marketing Data	The length of time You choose to receive direct marketing communications until You unsubscribe plus a reasonable period of time after that to allow for Your direct marketing preferences to be updated and/or Your Personal Data to be deleted.

In certain cases, it may be necessary to hold onto records for longer periods, e.g., to comply with obligations under different European legal and regulatory requirements.

1.7 Is Your Personal Data Processed Using Automated Tools?

Companion or the Insurer may engage in automated decision making to assess Your membership eligibility or to determine Your eligibility to make a claim. Such assessments can determine an outcome which could have legal or other similar effects for You (e.g., the acceptance or rejection of Your membership application under the Group Insurance Policy). When such automated decision-making is carried out, it can be based on systems and controls which help to e.g. assess Your eligibility to become a Member and use of systems and controls

to assess whether You are eligible to receive a Payout under the Group Insurance Policy and determine the amounts payable for claims based on defined algorithms.

IMPORTANT: Automated decision making may determine that You are not eligible to benefit from the Cancellation Upgrade cover. Companjon and the Insurer will implement suitable measures to safeguard Your rights, freedoms and legitimate interests, including providing You with the right to obtain human intervention and for You to express Your point of view and contest the decision (i.e., a human will review the automated decision). If You wish to seek a review of any such decision, please e-mail dpo@companjon.com.

1.8 What Are Your Data Protection Rights?

You have a number of rights in relation to Your Personal Data, which are set out in the table below. In particular, these rights include the right to object to processing of Your Personal Data where that processing is carried out on the basis of legitimate interests. Note that these rights are not absolute. You can exercise these rights by e-mailing dpo@companjon.com. Companjon will aim to fully respond to Your request within one-month of receiving it. Please also note that Your identity needs to be verified when You exercise Your data protection rights.

Right	Details
Right to Information	You have a right to be provided with clear, transparent and easily understandable information about how Your Personal Data is processed. This Privacy Notice is designed to give effect to this right.
Right to Object	You have a right to object to the processing of Your Personal Data where Companjon, the Insurer or GetYourGuide relies on its legitimate business interests to process such Personal data. You can request that processing of Your Personal Data is stopped, and such processing shall cease unless compelling legitimate grounds to continue processing Your Personal Data can be demonstrated or if Your Personal Data is needed in connection with any legal claims.
Right of Access	You have the right to access the Personal Data processed about You. If You exercise this right, You will receive confirmation about whether Your Personal Data is processed and, if so, a copy/copies of Your Personal Data.
Right to Rectification	You have the right to correct the Personal Data processed about You if the Personal Data about You is inaccurate or incomplete.
Right to Erasure	You have a right to request, in certain circumstances, the deletion of Your Personal Data. For example, if You exercise the right to object and no overriding reason exists to continue processing Your Personal Data or if processing Your Personal Data is no longer needed.
Right to Restriction	You have the right, in certain circumstances, to restrict processing of Your Personal Data. For example, if You contest the accuracy of the Personal Data held about You or You object against processing Your Personal Data.
Right to Withdraw	When You have given consent to the processing of Your Personal Data, You can withdraw such consent at any time and without giving reasons. This does not affect the lawfulness of processing based on Your consent until withdrawal.

Right	Details
Right to Lodge a Complaint	<p>You have the right to lodge a complaint with the Data Protection Commission ("DPC") of Ireland or with Your own local EEA Data Protection supervisor about the processing of Your Personal Data. To do so, use the DPC's "Raise a Concern" form. You are encouraged to contact Companjon, the Insurer or GetYourGuide before raising a concern with the DPC to see if any concerns You have about the processing of Your Personal Data can be resolved.</p>
Right to Data Portability	<p>You may request copies of Your Personal Data which You have provided, to be provided back to You in a structured, commonly used and machine-readable format and You may request that Your Personal Data is transmitted directly to another controller where this is technically feasible. This right only arises where:</p> <ul style="list-style-type: none"> • Your Personal Data is processed on the legal basis that it is necessary to perform the contract with You; and • the processing is carried out by automated means.
Right in Respect of Automated Decision Making (including Profiling)	<p>You have the right to not be subject to solely automated decision-making (including profiling) in respect of Your Personal Data which has legal effects or other similarly significant effects on You. To exercise this right, You can: (a) request that a person reviews any such decision; (b) express Your point of view; and/or (c) contest the decision.</p>

1.9 Changes To This Privacy Notice

This Privacy Notice may be amended from time to time to keep it up to date with current legal requirements and the way Companjon, the Insurer or GetYourGuide operates its business. Any changes made to this Privacy Notice will be appropriately notified to You in accordance with relevant data protection law.

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