



## Hillwalk Tours – Privacy Policy

EFFECTIVE DATE: 25/05/2018

This Privacy Policy governs and tells you the manner in which Hillwalk Tours Ltd. collects, uses, maintains and discloses information collected from persons who access and use the <https://www.hillwalktours.com> website and all products and services offered by Hillwalk Tours Ltd.

In collecting this information, Hillwalk Tours are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

Throughout the policy you will see the terms “we”, “us” and “our” which refer to Hillwalk Tours, while other terms such as “you” and “your” refer to any person using our website, products or services.

### 1. Who are we?

We are Hillwalk Tours Limited. Our address is 6 Galway Technology Centre, Mervue Business Park, Wellpark Road, Galway, H91 A560, Ireland. You can contact us by post at the above address, by email at [dataprotection@hillwalktours.com](mailto:dataprotection@hillwalktours.com) or by telephone on +353 91 763994.

We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details above.

### 2. Collection of Personal Data Information

We collect personal data information from you in a variety of ways; automatically through the use of web browser cookies, information that you provide directly to us via email communication, and information that you provide directly to us via forms on our website (i.e. newsletter sign up, booking form, contact us form).

The following sections are further detail as to what personal data information we collect from you at each point, why we collect this information, what we do with this information, and how long we keep this information for.

#### 2.1 Information Collected from Cookies

##### What personal data do we collect?

Through accessing our website we automatically collect information using web browser cookies or, ‘cookies’, as it’s more commonly known. Cookies are small data files stored on your hard drive or in device memory that help us improve our website and your experience, and track usage of our website. We use third party software called [Google Analytics](#) which records this data from your cookie and are considered to be a third-party data processor, in terms of your information.

Google Analytics collects and records data from your cookie in the following manner;

- Log Information – Information is collected about your use on our website to include; the type of browser that you use, the time, duration and frequency of your access, website pages viewed.
- Device information – Information is collected about the device you are using while accessing our website to include; the hardware model, operating system and version, unique device identifiers, and mobile network information.
- Location & Demographics Information – Information is collected with regards to where you are accessing our website from, through the location of your device, and general demographics, to include; an approximate geographical location, age range and gender.

Although Google Analytics records and collects this data none of this information personally identifies you to us. Google Analytics does record your devices IP address which could be used to personally identify you but Google do not grant us access to this.

#### **Why do we collect this information?**

We collect this information in order to operate and maintain our website, along with improving the user experience of the website. We also use the information to manage the performance of our website and to monitor and analyse trends, usage, and activities in connection with our website.

#### **How long do we keep your information for?**

We hold this information in our Google Analytics account for a period of 50 months from when you first access our website. After this period, information held about your website visit will be removed.

If you do not wish to consent to the collection of this information, you can 1) stop using our website or 2) disable cookies on your internet browser which will stop the collection and recording of data from Google Analytics from tracking any part of your visit to our website.

## **2.2 Information Collected from our Newsletter Signup**

#### **What personal data do we collect?**

When you subscribe to our newsletter, we ask you for your first name, last name, email address and your country.

#### **Why do we collect this information?**

We collect this information in order to send you our newsletter, which contains information about our products, special offers, company news and other information, in a more personalised manner.

We ask for your consent to do this through you submitting your information via our newsletter sign up forms or providing you with an option to opt-in to our newsletter. We will only send you our newsletter for as long as you continue to consent.

If you are under 16 years of age you MUST obtain parental consent before joining our email newsletter.

## **What do we do with your information?**

If you choose to join our regular newsletter mailings (which is sent via email), the information that you submit to us will be stored in our third party [Mailchimp](#) account which we use for our email marketing. We consider Mailchimp to be a third-party data processor, in terms of your information.

The Mailchimp database is stored in the US and the platform complies with the EU-US Privacy Shield Framework and the Swiss-US privacy shield framework as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the European Union to the United States, and therefore adheres to the Privacy Shield Principles.

Your information will remain on our newsletter list within the Mailchimp database for as long as we continue to use the Mailchimp platform for email marketing or until you specifically request removal from the list.

While your email address remains within the Mailchimp database, you will receive occasional newsletter-style emails from us.

We will not pass, share or sell your information to any other third parties. Your data will only be used for the purposes of our email marketing under your consent.

## **How long do we keep your information for?**

Your information is kept for as long as you continue to consent to receive our newsletter.

If you no longer want to receive our newsletter or for us to use your information - the simplest way to do this is to withdraw your consent, which you can do at any time, either by clicking the unsubscribe link at the end of any newsletter or request removal via [email](#).

## **2.3 Information Collected from Enquiries**

### **What personal data do we collect?**

When you make an enquiry with us using our 'contact us' form on our website, we ask you for your first name, last name, country of origin, contact telephone number and email address information.

If you make an enquiry with us directly i.e. email to email without the use of our online form, we collect the information you have voluntarily provided which can include your email address, first name, last name, country of origin and telephone number.

### **Why do we collect this information?**

We collect this information in order to process your enquiry with us and fulfil our service in a personalised manner, which can include us sending emails to your email address in regards to your enquiry or contacting you via your telephone number with regards to your enquiry.

We ask for your consent to do this through you submitting your information via our contact us form or through your own voluntary consent when sending an enquiry to us directly.

Hillwalk Tours will never ask you for any sensitive information.

### **What do we do with your information?**

Your information is stored in our secure and encrypted CRM/Booking system, which is based within the European Union, in order to process and fulfil your enquiry.

We will not pass, share or sell your information to any other third parties. Your data will only be used for the purposes of processing and fulfilling our service under your consent.

### **How long do we keep your information for?**

Through submitting your enquiry via the form on our website or through sending us an enquiry directly to us, you consent that your information can be retained in our CRM/Booking system for as long as you continue to consent for your information to be stored there. By allowing us to store your information, it not only helps us fulfil and process your initial enquiry, but also helps us provide you with a better service in future if you enquire about our products or services again.

If you no longer want your information to be stored in our CRM/Booking system - the simplest way to do this is to withdraw your consent, which you can do at any time, by requesting its removal via [email](#).

## **2.4 Information Collected from our Booking Form**

### **What personal data do we collect?**

When you make a booking with us on our website using our booking form, we ask you for your name, address, contact telephone number, email address, gender, date of birth and any allergies or dietary requirements information; and we ask for the first name, last name and age of any other participants on your tour/booking.

We also ask you for your credit/debit card information to process payment via [Paypal](#) or [Stripe](#) but we never collect and store your card details.

### **Why do we collect this information?**

We collect this information in order to process your tour/booking with us which can include us sending emails to you in regards to your tour/booking, contacting you via your telephone number with regards to your tour/booking and posting your tour/booking information pack to your postal address provided.

Your credit/debit card information is used to verify your card details and to process payment for the purchase of your tour/booking with us.

We require this information to process your payment, complete your tour/booking and fulfil our contract with you.

### **What do we do with your information?**

Your information is stored in our secure CRM/Booking system which is based within the European Union, in order to process and fulfil your booking.

We use both Paypal and Stripe, third party online payment systems, to process your credit/debit card details for payment for any bookings made on our website. Neither PayPal nor Stripe retain any financial information you may submit as part of the booking process. PayPal and Stripe monitor every transaction, 24/7, to prevent fraud, email phishing and identity theft. Every transaction is heavily guarded behind advanced encryption.

If you purchase your tour/booking via bank transfer payment, information about you and your transaction will be stored in our relevant [Allied Irish Bank \(AIB\)](#) or [Ulster Bank](#) bank accounts, whichever you made payment to, in order to process your transactions. Every transaction within these bank accounts are heavily guarded behind advanced encryption.

On occasions, we may use [Waveapps](#) to send you an invoice(s) requesting payment for your tour/booking, in which case your first name, last name and email address are used to process the invoice.

PayPal, Stripe, AIB, Ulsterbank, Waveapps or Hillwalk Tours will never ask for any sensitive information.

In order to process and fulfil your tour/booking, we share your first name, last name and telephone number, along with the first name and last name of other participants on your tour/booking, with our third party suppliers which we book on your behalf and which are being used as part of your tour/booking.

We will not pass, share or sell your information to any other third parties not associated with your tour/booking. Your data will only be used for the purposes of processing and fulfilling your tour/booking under your consent.

### **How long do we keep your information for?**

Through acknowledging this privacy policy and submitting your tour/booking via the form on our website, you consent that your information can be retained in our CRM/Booking system for as long as you continue to consent for your information to be stored there. By allowing us to store your information, it not only helps us fulfil and process your initial tour/booking, but also helps us provide you with a better service in future if you enquire about our products or services again.

If you no longer want your information to be stored in our CRM/Booking system - the simplest way to do this is to withdraw your consent, which you can do at any time, by requesting its removal via [email](#).

### **3. Third party websites**

You may find content on our website that links to other third party websites. We do not control the content or links that appear on these sites and are not responsible for the practices employed by websites linked to or from our website. In addition, these websites or services, including their content and links, may be constantly changing. These third party websites and services may have their own privacy policies and customer service policies. Through browsing and interacting on any of these third party websites means that you and your personal information is subject to that website's own terms and policies.

#### **4. Changes to this privacy policy**

Hillwalk Tours Ltd. has the discretion to update this privacy policy at any time. When we do, we will post a notification on the main page of our website. We encourage you to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of modifications.

#### **5. Your rights over your information**

As a data subject, you have the following rights under data protection legislation:

- the right of access to personal data relating to you.
- the right to correct any mistakes in your personal data.
- the right to ask us to stop contacting you with direct marketing.
- rights in relation to automated decision taking.
- the right to restrict or prevent your personal data being processed.
- the right to have your personal data ported to another data controller.
- the right to erasure.
- the right to complain to the Data Protection Commissioner if you believe we have not handled your personal data in accordance with the data protection legislation.

We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex or cumbersome, in which case we will respond within three months (we will inform you within the first month if it will take longer than one month for us to respond).

Where a response is required from us within a particular time period pursuant to data protection legislation, we will respond within that time period.

To submit a request with regards to information held about you, you can do so by email, post or telephone, using the contact information provided under the 'Who We Are' section, at the start of this policy.

#### **6. Your right to complain**

If you have a complaint about our use of your information, you can contact the Office of the Data Protection Commissioner via their [website](#), through email at [info@dataprotection.ie](mailto:info@dataprotection.ie) or by writing to them at:

Office of the Data Protection Commissioner  
Canal House  
Station Road  
Portarlinton  
Co. Laois  
R32 AP23  
Ireland