

## Privacy Policy

### Our Policy

Grant Morris Cruise and Travel Service Limited is committed to protecting the privacy of our customers. We require your consent in order to continue to send you information on travel, tours and related specials. We will never collect, use or share any personal information without our Customers' permission.

Grant Morris Cruise and Travel Service Limited understands the importance of maintaining the privacy of our customers. From time to time we will ask to collect information about customers that allows us to process travel requests more efficiently. Our aim is to provide customers with an excellent travel experience. Any information that we may obtain stays at Grant Morris Cruise and Travel Service Limited. It is used to offer travel specials to our customers and to communicate with customers quickly and efficiently. Nothing is sold, bartered, or given to other companies or persons without the customer's permission.

Our website uses "cookies" to help personalize customers' online experience, such as recognizing their name when they revisit. A cookie is a text file that is anonymously placed on the customer's hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to their computer. Cookies are uniquely assigned to the customer, and can only be read by a web server in the domain that issued the cookie to the customer. We will not share or sell information contained within cookies with any other person or third party.

Customers also have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but Customers can usually modify their browser setting to decline cookies if they prefer. If customers choose to decline cookies, they may not be able to fully experience the interactive features of our website or being automatically recognized as a registered user, or function properly.

We will occasionally amend this privacy policy to reflect company and customer feedback. We encourage customers to periodically review this policy to be informed of how Grant Morris Cruise and Travel Service Limited is committed to protecting their information.

We ask for your comments and questions. If customers have any comments or questions about our Privacy Policy, or if customers would like to correct or review any information they may have provided us, they are encouraged to contact us at [grant@grantmorriscruise.com](mailto:grant@grantmorriscruise.com) or 905-404-0061.

### Our Privacy Policy

Grant Morris Cruise and Travel Service Limited is committed to respecting your privacy and protecting your personal information

Grant Morris Cruise and Travel Service Limited is committed to protecting your privacy. Indeed, we attach particular importance to protecting the personal information that you share with us and we strive to maintain your trust in this regard.

When you do business with us, we need to collect some personal information about you such as your name, email address, passport details and payment information. This information is used, for example, to process your booking and travel arrangements and purchases. Some of this information is shared with our trusted partners such as hotels and airport ground handlers to ensure that your baggage arrives safely at your destination.

In this privacy policy (hereinafter the "Policy") we explain how we collect, use and

protect your personal information.

This Policy applies to all personal information we process about you when you do business with us, purchase or use our services, visit our website or otherwise interact with us. This Policy was developed to comply with the requirements of the privacy protection legislation in force.

Please refer to the “How to Contact Us” section if you have any questions, comments or requests regarding the Policy or your personal information.

Our full Policy can be accessed below.

#### Full Privacy Policy

##### Our commitment

We have developed and implemented internal policies and procedures designed to provide adequate protection of the personal information in our possession and we review these on a regular basis.

We educate our employees about the importance of protecting personal information by providing them with training on this topic and by issuing directives outlining their role and obligations in this regard.

We take reasonable measures to ensure that our agents, mandataries, representatives and employees comply with the provisions of the privacy protection legislation in force.

What is the scope of application of this policy and controller?

The provisions of this Policy apply to all personal information collected and processed by our agency within the framework of its activities, unless otherwise indicated when collecting such personal information.

We have assigned the task of ensuring the protection of our customers' personal information and answering privacy questions to Grant Morris Cruise and Travel Service Limited Data protection officer.

The person responsible for the processing of personal data is:

Grant Morris Cruise and Travel Service Limited Data protection officer,  
Grant Morris Cruise and Travel Service Limited  
407 Meadow Street  
Oshawa, Ontario, L1L 1C1

If certain sections of our website refer you to other websites operated by third parties, the information collected by said third parties on these other sites are not subject to this Policy, when it is not used by us. We therefore encourage you to review the privacy policies of these websites.

What is considered personal information?

Personal information is any information that identifies you or can be used to identify you. Your personal information may include, for example, your name, your contact details or information relating to your travel itinerary (e.g. your booking reference number).

This information may be collected from you during any interactions you have with us, for example when you visit our website, make a booking, call us or send us an email.

This information may also come from travel counsellors.

What personal information do we collect?

We may collect and process the following categories of personal information:

Identification

Your name, date of birth, gender, nationality and passport number. If your minor children are included in the booking, we will collect their identification information.

Contact information

Your telephone number, physical address and email address.

Booking details

During the booking process we collect information about your booking that may include your date of travel, flight reservations, hotel reservations, payment details and any ancillary services such as seat selection, upgrades and extra baggage.

Travel details

When you do business with us, we collect and process information in relation to your travel such as your travel itinerary, check-in information, electronic boarding pass, medical needs, special dietary requirements and any additional assistance or preferences.

Interactions

When you communicate with us via email, online or via social media, we store your communication and, if relevant, each attachment such as pictures and/or videos. When you contact us by telephone, we may record your telephone calls for training purposes or to prevent fraud. We also collect your questions or complaints.

Previous bookings with us

We collect information about services we have provided to you in the past, including your previous travel arrangements (flights and other bookings), interactions and customer feedback.

Sensitive personal information

When providing services to you, we may collect personal information that is considered

sensitive as it could reveal your racial or ethnic origin, physical or mental health, religious beliefs or criminal convictions or offences.

For example, should you request special medical assistance during a flight (e.g. need for a wheelchair or oxygen), this may reveal information about your health. In addition, your religious beliefs may be revealed when you request special meals or advise us of other dietary requirements. Likewise, your travel document details may contain information that may reveal your racial or ethnic origin.

When providing sensitive personal information, explicit consent to the processing of this information must be given. This sensitive personal information will be used strictly to allow us to provide any special services requested and to fully perform our obligations.

### Third Party bookings

A third-party booking is when a family member, friend or another person (hereinafter the "Third Party") makes a booking on your behalf. This Third Party will necessarily provide us with the same personal information that we would collect from you directly in order to complete your booking. In such circumstances, the Third Party will have ensured that you have been made aware of the content of this Policy and that you consent to supply your personal information to us.

### How do we use your personal information?

We use your personal information for the following purposes:

#### To provide you with our services

We may use your personal information to process and manage your booking and to fulfil your travel arrangements and purchases. For example:

To identify you in order to issue your ticket;

To ensure you receive specified dietary requirements;

To inform the flight crew and other members of the team that you have purchased Option Plus; etc.

In case of non-provision, objection or restriction to processing or erasure of any information necessary to provide you with our services and those of our partners, or in the event you wish to withdraw consent previously given to us for the collection and use of your sensitive personal information, they as we may not be able to provide certain or all of our services to you. In such circumstances, cancellation fees may apply.

#### To communicate with you and keep you informed

We may need to contact you by email and/or by telephone for administrative or operational reasons. For example:

To send you confirmation of your bookings and your payments;

To inform you about your travel itinerary;

To notify you when check-in is available or to advise you of disruption and changes to your flights; etc.

We will also use your contact information for commercial prospecting and to send you marketing communications, if you agreed to receive such communications.

Your opinion is very important to us, so we may seek your feedback on our services via email, social media or surveys.

We will use the communications you exchange with us and the feedback you may provide in order to manage our relationship with you and to improve our services and experiences for customers.

To personalise and improve your customer experience

We may use the communications you exchange with us and information about how you use our website to improve our products and services and to ensure that you receive commercial communications from us that are relevant to you.

To improve your shopping experience on our website

We may use personal information about your use of our website through cookies and other technologies and mobile applications to:

Track and analyse your usage of our website to improve the relevance of our website content and to understand what is relevant to you;

Measure the effectiveness of and to improve the relevance of our advertisement and promotions;

Conduct markets, products or sales research and analysis to improve our products and services;

Customize our marketing communications to you, if you agreed to receive such communications;

Execute relationship marketing campaigns and retargeting using social media and other advertisement partners;

Contact you to offer you more information about a product or service, if you agreed to receive such communications.

What is our legal basis for processing your information?

The legal basis for processing your information will depend on the reasons your information was collected. We will only process your personal information where we have a legal basis to do so. According to privacy laws, the legal basis for processing your information may be:

To process and manage your booking, fulfil your travel arrangements and otherwise perform the contract we have with you;

To comply with a legal obligation;

Because you have consented to us using your information for a particular purpose;

Because it is in our legitimate interest to use your personal information, in particular, to enhance and improve our products and services, personalise our offers, develop new products and prevent fraud.

How long do we retain your personal information?

We will only keep your information for as long as we reasonably need it for the purpose it is being collected or processed for in accordance with this Policy or in order to comply with the law.

For example, your personal information related to your booking will be retained to fulfil the specific travel arrangements you have made. Afterwards, we will keep the information for a period of time which enables us to handle or respond to any complaints, queries, concerns or legal procedures relating to the booking.

We will actively review the information we hold and delete it securely or anonymize it, when there is no longer a legal, business or customer need for it to be retained.

How do we keep your personal information safe?

We have implemented a combination of material, organisational and technological means to ensure the confidentiality of the personal information that we hold, to protect such information against loss or theft and to prevent any unauthorized access, transmission, reproduction, use or amendment thereof.

We use industry standard SSL (Secure Sockets Layer) encryption for the transmission of personal information on our website, for example when you pay by credit card online. You can verify this protection by looking for the padlock symbol on many browsers. SSL allows a secure connection between your internet browser and our internet server, using a private (or secret) key to encrypt the information.

When we share personal information with a third party, we take appropriate security measures to ensure such third party's compliance with the undertakings and rules set forth in this Policy.

When our agency does business with people in Europe:

If you are a resident of a member state of the European Economic Area (hereinafter the "EEA"), your personal information may be accessed and processed outside of the EEA by our agency, whose servers are located in Canada, and/or by one of our trusted third party service providers. Except as provided for in article 49 of the General Data Protection Regulation n° 2016/679 (hereinafter the "GDPR"), when your personal information is transferred outside of the EEA, we require that an adequate level of protection is in place according to the data protection legislation in force.

In this respect, we specify that :

Canada has been recognized by the European Commission as ensuring an adequate level of protection;

With regard to the transfer of data to the United States, your personal information will only be transferred to third-parties who undertook to provide guarantees as to the secure processing of personal data in accordance with the Privacy Shield (data protection shield) recognized by the European Commission as ensuring an adequate level of protection; for additional information, please refer to the website [privacyshield.gov](https://www.privacyshield.gov);

For other countries, we have ascertained that the recipients of your personal information have put in place the appropriate safeguards in order to ensure that your personal information is adequately protected, the whole in accordance with the data

protection legislation in force.

#### Your rights concerning your personal information

In light of the obligation to ensure the security and confidentiality of the personal information being processed, two valid pieces of identification must be provided in support of any request made pursuant to the rights listed hereunder.

You have the right to access and rectify your personal information. You also have the right to withdraw your consent to processing of your personal information. Accessing the personal information contained in your file and rectifying such personal information is free of charge.

#### Accuracy and rectification of your personal information

We make every effort to keep the personal information in our possession accurate, complete, and up to date. However, you are in the best position to quickly inform us of any changes to your personal information, and we therefore ask you to inform us of any amendments, if applicable.

At any time, you may request that the appropriate corrections be made to the personal information that we hold about you. If applicable, we will forward the amended information to the third parties that have access to your personal information.

#### Withdrawal of consent to process personal information

When we process your information based on consent you have previously given, you may withdraw said consent at any time.

#### When our agency does business with people in Europe:

EEA residents Rights to data portability, to object, to restriction of processing and to erasure

In addition to the rights detailed above, if you reside in a member state of the EEA, you shall have the right, with regards to your personal information, to erasure, to restriction on processing, to object on legitimate grounds to processing as well as to obtain data portability, in circumstances described in the GDPR. A small fee may be required, upon notice from us, to cover the administrative costs of processing such requests.

You may also lodge a complaint with the competent Supervisory Authority in order to enforce your rights, notably under the GDPR.

In addition, if you are a resident of France, you have the legal right to direct generally or particularly how your personal information may be used after your death.

Furthermore, when your personal information has been collected in France and you do not wish to be contacted by telephone for commercial solicitation purposes, you can register, without cost, to a list of opposition to telephone solicitations on the website [www.bloctel.gouv.fr](http://www.bloctel.gouv.fr).