

Our Commitment to Keeping Your Data Safe

EEFC, Inc. (dba YMT Vacations) is part of the Travelopia group of companies (<https://www.travelopia.com/>). Here at YMT Vacations, we take your privacy very seriously.

We understand the concerns about how data may be stored, sent, and used by companies. We are committed to complying with all data protection laws and want you to feel confident in the measures we are taking to uphold your data privacy rights.

This privacy notice explains how we collect and use your personal data. We explain the types of information we collect, how we collect it, what we use it for, and who we may disclose your personal data to. Depending on where you live, we also let you know what rights you have over your information.

Who's in control?

EEFC, Inc. is the "data controller" or "business", as those and similar terms are defined under applicable data privacy laws, of all personal data collected and used for the purposes of providing our products or services and for any other purposes set out in this privacy notice. This means that EEFC, Inc. is responsible for keeping your personal data safe; deciding how and why your data is used; and ensuring that your personal data is handled legally.

What personal data might we collect about you?

We do our best to keep the personal data we collect about you to the minimum necessary needed to fulfil the purpose of collection or processing.

The personal data we collect depends upon how you are interacting with us. For example, if you are making a booking with us, we are likely to ask for more information than if you're only requesting a brochure or browsing our website. We may collect, use, store and transfer different kinds of personal data depending on the nature of the product or service you buy from us; the below contains some of the personal data we may ask you to provide:

Details about you: Your first and last name, marital status, title, gender, e-mail address, telephone number, postal address, date of birth, loyalty membership details, your reasons for travel, emergency contact details, clothing size (for merchandise) and qualifications (e.g., if you book a cruising/sailing holiday).

Payment details: Your bank details and payment card details when making a booking with us. Details about payments to and from you and other details of products and services you have purchased from us.

Identification documents: If you are travelling on a route requiring advance passenger information, your passport or identity card details including your passport number, the country in which your passport was issued and the expiry date.

Details about your booking with us: Details such as where you are flying from and to, your booking information (including anyone else on the booking), any onward travel details if relevant, details of experiences or excursions booked through us, baggage requirements, upgrade information, lounge visits, seat preferences, meal or dietary preferences or requirements, details of any special assistance required and any other relevant information so that we can provide you with the entirety of the services you have arranged with us.

Details from your interactions with us: Information about interactions or conversations with us and our staff, including when you make enquiries, comments, complaints or submit feedback to us. This could also include username and password and your interests, marketing preferences, reviews, and survey responses.

Your use of our systems and services: This includes how you use our site, app, physical locations (such as bases, vessels, or retail stores), call centres, social media pages, IP addresses, information from cookies and other electronic tracking technologies and information you may post on social media.

Job applications: If you apply for a job with us, your CV, work history, educational details, and the role you are applying for.

Special types of data: In some circumstances, we may need to collect personal data from you that is deemed sensitive. For example, we might collect:

- **Data about your health.** Knowing your dietary requirements, medical history, and any medical conditions you have will ensure that the trip is suitable for you, that any necessary adjustments are made, and that we can provide you with appropriate or emergency medical care in the event of an incident, if necessary.
- **Information about your personal beliefs.** For example, if you specify a meal preference that indicates a particular religion, such as a kosher or halal meal.

We try to limit any sensitive personal data we collect to the minimum possible. Where we are required to do so by applicable law, we will ask for your explicit consent to collect it.

Children's personal data

We do not knowingly collect or solicit any personal data directly from children under the age of 16. In the event that we learn that we have collected personal data from a child, we will promptly take steps to delete that information. If you are a parent or legal guardian and think your child has given us their personal data, you can contact us via the methods in the 'How can you contact us?' section below.

How do we collect your personal data and why?

Depending upon your interactions with us, we might collect personal data in the following ways:

Direct interactions:

You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise, this includes personal data you provided when you:

- book or search for a holiday or other service (such as a flight, cruise, hotel lounge access, transportation, or special assistance) via one of our websites, any apps we use, physical locations (such as bases, vessels, or retail stores), our call center.
- fill in part of the booking information on our site but do not complete the booking.
- request a brochure, sign up to receive email updates, participate in any of our competitions, promotions (for example via any social media channels, email, or our site), reviews, surveys, or market research.
- create an account on our website and enter information onto online forms.
- provide us with information about an accident, illness or incident that occurred or some other feedback.
- apply for a job with us by email or via the site.
- contact us via our call centres, press office, physical locations (such as bases, vessels, or retail stores), social media, post, email, or instant messenger. Our interactions with you may be recorded and monitored for the purposes of improving customer service, quality assurance, training, security, and general business purposes; or
- attend any of our in-person or virtual events.

Cookies and other automated technologies:

As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, pixels, web beacons and other similar technologies. We process the personal data collected through such technologies to help operate certain features of our website, to enhance your experience through personalisation, and to help us better understand the features of the website that you and other users are most interested in.

We use analytics services, including Google Analytics, to assist us with analyzing our website traffic through cookies and similar technologies. To learn more about how Google uses data, visit Google's page on <http://www.google.com/policies/privacy/partners>. You may download the Google Analytics Opt-out Browser Add-on (<https://tools.google.com/dlpage/gaoptout>) for each web browser you use, but this does not prevent the use of other analytics tools.

To learn more about Google Analytics cookies, visit:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>.

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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy for further details.

Third parties or publicly available sources

We may receive personal data about you from various third parties, including (but not limited to) those set out below:

- a) airlines, hotel providers or other parties we work with if you make a complaint to them or otherwise regarding the services provided to you by those third parties.
- b) analytics providers.
- c) authorities, agencies, regulators, or other bodies following an accident or incident; and
- d) travel agents and affiliates.

How and why do we use your personal data?

We have set out below a description of the ways we may process your personal data:

What we use your personal data for

To manage your booking with us. We will use your personal data to provide you with any products or services that you request or purchase.

To contact you with information about your bookings and support services. We will use your contact details to send you communications that relate to bookings or services that you have requested. The types of information usually included would be: e-mails responding to enquiries, providing you with tickets, alerting you to changes in itineraries or responding to any complaints you have.

To provide assistance with online bookings. We may collect personal data when you enter it into forms on our websites but do not complete your booking. We do so in order to offer assistance in case you are experiencing difficulties using our websites.

To handle and investigate complaints. We may use your personal data to follow up on and manage complaints. In some instances, we may disclose your personal data to relevant third parties in order to properly investigate.

To enable you to partake in a prize draw, competition or complete a review or survey.

To send you marketing communications. We will use your personal data to contact you in order to keep you up to date with the latest news, offers, events, sales, brochures, promotions and competitions that we consider may be of interest or relevant to you.

To personalise your customer experience and improve our service. We use your personal data to provide you with a more personalised service. This might include personalising the communications we send to you with preferences, sending you only with advertising that we think you might like and/or enhancing your holiday experience. We may also record and/or monitor calls.

To ensure security and protect our business interests. In certain circumstances, we use your personal data to ensure the security of our services, buildings, physical locations (such as bases, vessels, or retail stores), and people, including to protect against, investigate and deter fraud, unauthorised or illegal activities, systems testing, maintenance and development.

To process your job applications. We will use your personal data to process any job applications that you submit to us, whether directly or via an agent or recruiter (speculatively or in response to any ad).

To optimise our sites and app. If you use our sites or apps, we will use your personal data to ensure that the content from our websites are presented in an effective manner for you and your device, to provide you with access to our site and app in a manner that is effective, convenient and optimal, and to provide you with content that is relevant to you, using site analytics and research and in certain circumstances combining that with other information we know about you.

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

To conduct research. We use your personal data to carry out aggregated and anonymised research about general engagement with our services and systems, or if you choose to participate in customer surveys, consumer focus groups and research.

To comply with our legal obligations. In certain circumstances, we will need to use your personal data to comply with our legal obligations, for example to comply with any court orders or subpoenas.

To protect, realise or grow the value in our business and assets. We may use your personal data in connection with a significant corporate transaction or restructuring, which may include (without limitation) merger, acquisition, asset sale or initial public offering or in the event of insolvency.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and if required we will obtain your consent to such use.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How do we use your personal data for marketing and advertising purposes?

When we will get in touch with you

One of the other reasons we sometimes collect your personal data is so that we can form a view on what may be of interest to you. With this information, we decide which products, services and offers may be relevant for you and what marketing you may be interested in.

We keep you up to date with our latest offers, partnerships, sales, promotions, and competitions (or those of our partners such as other members of the Travelopia group) that we think might be of interest/relevance to you.

When required by applicable law, we will obtain your consent prior to contacting you for these purposes.

What if I don't want to receive marketing?

We never want to send our marketing to someone who isn't interested in receiving this content. If you have decided that you no longer wish to hear from us, you can unsubscribe from marketing by clicking on the 'unsubscribe' link included in all our e-mails or by contacting us.

Who do we disclose your personal data to?

In order to provide you with the services described above, we may disclose your personal data to third parties such as:

- **Companies within the Travelopia group.** We may disclose your personal data to other companies in the Travelopia group, for example and without limitation, to provide, manage and improve our products and services; for day-to-day administrative and operational purposes including delivery of our products and services; to help to personalise your experience; to handle and manage any complaints and enquiries where such services are provided at Travelopia group level; and where appropriate, to make contact and interact with you.
- **Third party suppliers we work with to provide your booking and our other services to you.** We may disclose your personal data to third parties such as, but not limited to, travel agents, booking agents, airlines, hotels, destination management companies, tour operators, event operators, transport companies, excursion providers, airport authorities, insurance companies, car hire companies, ground handling agencies, and cruise companies.
- **Service providers that we work with in connection with our business.** We disclose your personal data to third party service providers that we use to provide services in connection with the products, services and experiences we offer to you. This might include marketing agencies and/or companies that run our marketing campaigns, IT developers, service providers and hosting providers, third parties that manage promotions, competitions, reviews or surveys, software companies, site analytics providers, medical service providers, payment service providers and credit card screening companies.
- **Airports, immigration / border control and/or other government authorities.** Sometimes we have to provide certain personal data about you to border or immigration authorities of the country you are travelling to. This would usually be the basic information contained in your passport, but the laws of certain countries may require additional information. We will provide this personal data when we are required to do so.
- **Third parties/other Travelopia group companies for marketing.** In accordance with applicable law, we may disclose your personal data to third parties or other Travelopia group companies for marketing purposes.
- **Credit references and fraud prevention agencies.**
- **Courts or advisors.** We may have to disclose your personal data to other third parties (such as legal, accountants or other advisors, regulatory authorities, courts and government agencies) to enable us to enforce our legal rights, or to protect the rights, property or safety of our employees or where such disclosure may be permitted or required by law.

- **Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets, alternatively, other businesses we may seek to acquire or merge with (and professional advisors acting on our or their behalf).** If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice. In the event of our insolvency we, or any appointed insolvency practitioner, may disclose your personal data to third parties (such as regulators or trade associations) so that they can assess the status of your booking and advise you on the appropriate course of action under any scheme of financial protection.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or disclose your personal data. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

International use of our website or services

If you are visiting this website or using our products or services from outside of the United States or Canada, please note that by providing your personal data, it may be transferred to, stored, collected, or processed in the United States or Canada.

What are your personal data rights?

Depending on where you live in the United States or Canada, and subject to certain exceptions, you may have the following rights with respect to your personal data:

- **Access:** You may have the right to know what personal data we have collected about you and to access such personal data.
- **Data portability:** You may have the right to receive a copy of your personal data in a portable and readily usable format.
- **Deletion:** You may have the right to delete your personal data.
- **Correction:** You may have the right to correct inaccuracies in your personal data.
- **Opt out of certain processing:** You may have the right to opt out of the processing of your information for purposes of (a) targeted advertising, (b), the sale of your personal data; or (c) profiling in furtherance of decisions that produce legal or similarly significant effect concerning you.

If you wish to exercise any of the privacy rights afforded to you in this section, please see the "How can I exercise my rights?" section below.

Keeping your personal data secure

We take the security of your personal data very seriously. While no organisation can guarantee absolute security, we have reasonable technical and organisational security measures in place to address risk and prevent your personal data from being accidentally or unlawfully lost, used, accessed, altered, or disclosed in an unauthorised way. In addition to these measures, we limit access to your personal data to those employees, agents, contractors, and other third parties on a 'need-to-know' basis.

How long do we keep your personal data for?

We will retain personal data only for as long as necessary to fulfil the purposes described in this privacy notice, unless otherwise required by applicable laws. We consider the following criteria to determine how long we will retain your personal data, including whether: we need your personal data to provide you with the products and services you requested; we continue to have a business relationship with you; you have requested information on our products and services; we have a legal right or obligation to continue to retain your personal data; we have an obligation to a third party that involves your personal data; our retention or recordkeeping policies and obligations dictate that we retain your personal data; we have an interest in providing you with information about other products and services; and we have another business purpose for retaining your personal data.

In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

California residents

This section applies to our collection and use of Personal Information if you are a resident of California, as required by the California Consumer Privacy Act of 2018 and its implementing regulations, as amended by the California Privacy Rights Act (collectively, "CCPA"), where "Personal Information" has the definition set forth in the CCPA.

Categories of Personal Information Collected, Used, and Disclosed

We have collected the following categories of Personal Information from our customers within the last 12 months. The sources from which we obtain this information and the ways in which we use this information are set forth in above. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Categories of CA Personal Information We Collect	Categories of Third Parties to Which We Disclose Personal Information for a Business or Commercial Purpose	Categories of Third Parties to Which We May Sell or Share Personal Information
Identifiers	Affiliates, third party suppliers, and service providers	Companies that operate cookies and other online tracking technologies
Personal information, as defined in the California customer records law	Affiliates, third party suppliers, and service providers	Companies that operate cookies and other online tracking technologies
Commercial Information	Affiliates, third party suppliers, and service providers	Not sold or shared
Biometric Information	N/A	N/A
Characteristics of protected classifications under California or Federal Law	Affiliates and service Providers	Not sold or shared
Internet or other similar network activity	Affiliates, third party suppliers, and service providers	Companies that operate cookies and other online tracking technologies
Geolocation data	Affiliates, third party suppliers, and service providers	Companies that operate cookies and other online tracking technologies
Audio, electronic, visual, thermal, olfactory, or similar information	Affiliates, third party suppliers, and service providers	Not sold or shared
Inferences drawn from other personal information	Affiliates, third party suppliers, and service providers	Companies that operate cookies and other online tracking technologies
Professional or employment-related information	Affiliates, third party suppliers, and service providers	Not sold or shared
Non-public education information (per the	N/A	N/A

Family Education Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)		
Sensitive personal information	Affiliates, third party suppliers, and service providers	Not sold or shared

Please see the 'How long do we keep your personal data for?' section for information related to our data retention practices.

California Privacy Rights

Subject to certain exceptions, you may have the following rights:

Privacy Right	Description
Notice	The right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and disclosed.
Access	The right to know what Personal Information we have collected about you, including (a) the categories of Personal Information; (b) the categories of sources from which the Personal Information was collected; (c) the business or commercial purpose for collecting, selling, or sharing Personal Information; (d) the categories of third parties to whom the business discloses Personal Information; and the specific pieces of Personal Information we have collected about you.
Data Portability	The right to receive a copy of your Personal Information in a portable and readily usable format.
Erasure	The right to have your Personal Information deleted.
Correction	The right to request that we correct any incorrect Personal Information that we collect or retain about you.
Automated Decision Making	The right to request information about the logic involved in automated decision-making and a description of the likely outcome of processes, and the right to opt out. We do not currently engage in any automated decision-making practices.
To Opt Out of Sales or Sharing of Personal Information	To the extent we sell or share your Personal Information, you may have the right to opt out of such sale or sharing by clicking the " https://www.ymtvacations.com/do-not-sell-my-personal-information Do Not Sell or Share My Personal Information" link at the bottom of this Site.
Limit the Use of Sensitive Personal Information	We do not use or disclose Sensitive Personal Information other than to provide our products and services.

Only you, or an authorized agent that you authorize to act on your behalf, may make a request related to your Personal Information. You may also make a request on behalf of your minor child.

You may only make a request for access or data portability twice within a 12-month period. The request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- For more information see the "How can I exercise my rights?" section below.

Other California Rights

Pursuant to California's Shine the Light statute (Cal. Civ. Code Sec. 1798.83), individual customers who reside in California and who have an existing business relationship with us may request information about our disclosure of certain categories of personal information to third parties for the third parties' direct marketing purposes, if any. To opt-out of us sharing your information with third parties for such promotional purposes, email us at the email address provided in the "How can you contact us?" section of this privacy notice and include "Marketing Opt-Out" in your request. This request may be made no more than once per calendar year. Please note that, as of the date of this privacy notice, we do not disclose your information with third parties for their marketing purposes.

Information for individuals in Canada

We comply with applicable Canadian data protection laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA).

Your provision of personal data to us means that you agree and consent that we may collect, use, and disclose your personal data for the purposes described in this privacy notice. Should you choose not to provide us with required personal data, we may not be able to provide certain services. You acknowledge and consent that we may retain service providers to perform certain services. In the event that a service provider is located in the United States or another jurisdiction, personal data may be processed and stored in that jurisdiction, and that foreign courts or law enforcement or regulatory agencies may be able to obtain disclosure of personal data through the laws of those jurisdictions.

Residents of Canada may access, review, and request correction of their personal data held by us. We will take reasonable steps to verify your identity prior to responding to your requests. The verification steps will vary depending on the sensitivity of the personal data and whether you have an account with us.

We reserve the right not to change personal data if we disagree that it is incorrect, but we will maintain a record of your request. We may not provide access to personal data if an exemption applies, for example, where the information requested would disclose the personal data of another individual or if the information would reveal confidential commercial information.

You have the right to refuse to provide or to withdraw your consent to processing of your personal data at any time. This would not affect processing where the applicable law allows us to process personal data without consent.

We will not collect, use or disclose your personal data for any other purpose than those outlined above, except with your consent. We will respond to your request regarding your personal data as promptly as possible.

How can I exercise my privacy rights?

You will not be discriminated against in any way by virtue of your exercise of the rights listed in this privacy notice which means we will not deny goods or services to you, provide different prices or rates for goods or services to you, or provide a different level or quality of goods or services to you.

To exercise any of the privacy rights afforded to you under applicable data protection law, please submit a request to us by one of the following methods:

Calling us toll free at **1-800-231-1234**

E-mailing us at **dataprotection@ymtvacations.com**

Verification and Process

We must verify your identity before fulfilling your requests. If we cannot initially verify your identity, we may request additional information to complete the verification process. We will only use personal data provided in a request to verify the requestor's identity. If you are an authorized agent making a request on behalf of an individual, we will also need to verify your identity, which may require proof of your written authorization or evidence of a power of attorney.

We endeavor to respond to requests within the time period required by applicable law. If we require more time, we will inform you of the reason and extension period in writing.

Whether you have an account with us or not, we will deliver our written response by mail or electronically, at your option.

We do not charge a fee to process or respond to your request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

We cannot respond to your request or provide you with personal data if we cannot verify your identity and confirm the personal data relates to you. Making a verifiable consumer request does not require you to create an account with us.

We may deny certain requests, or only fulfill some in part, as permitted or required by law. For example, if you request to delete personal data, we may retain personal data that we need to retain for legal purposes.

Appeals

If you are not satisfied with the resolution of your request and you are afforded a right to appeal such decision, you can contact us using the information provided below.

How can you contact us?

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Data Protection

EEFC, Inc.

3830 Monte Villa Pkwy Ste 210

Bothell, WA 98021

To: dataprotection@ymtvacations.com

Cc: dataprotection@travelopia.com

Please contact us in the first instance if you have any concerns. If we are unable to resolve your concern, you have the right to make a complaint to the relevant data protection authority where you live.

Changes to this privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. This version was last updated September 2023.

Please note that we may modify or update this privacy notice from time to time, so please review it periodically. We may provide you with an updated privacy notice if material changes are made. Unless otherwise indicated, any changes to this privacy notice will apply immediately upon posting to our website.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.