



## Privacy Policy

### Introduction

1. We, Nowboat Limited operate the adventure-booking website at [www.nowboat.com](http://www.nowboat.com) ("**Site**") which provides a marketplace to facilitates users to make a booking ("**Booking facilities**") to purchase adventure-related services offered from brokers, agencies and operators on the Site ("**Services**").
2. Nowboat Limited ("**We**" or "**Us**") is responsible for the use and processing of your Personal Data (the "**Data Controller**"). We are committed to protecting and respecting your privacy.
3. This Privacy Policy will apply to your use of the Site and the booking of Services thereon.
4. For the purposes of this Privacy Policy, "**Personal Data**" means information relating to a living individual who is or can be identified either from that information or from that information in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.
5. This policy sets out clearly:
  - 5.1. type of information collected;
  - 5.2. our purposes of data collection;
  - 5.3. the classes of persons we can transfer personal data to; and
  - 5.4. the data access and correction right of Site users ("**Data Subject**").
6. By using our Site and Services, you will be deemed to have accepted and agreed to be bound by this Privacy Policy. We may amend this Privacy Policy from time to time. If we make any substantial changes in any way we use your Personal Data, we will notify you by posting a prominent announcement on our Site and your continued use of our Site indicates your agreement with any changes in this Policy.
7. You note that by using our Site:

- 7.1. You agree that if you disclose your Personal Data to us, we may create a database record about you;
  - 7.2. You agree for us to collect any Personal Data necessary to provide you with the Services, and that such Personal Data may be disclosed to the Providers, or other partners where necessary, for the purposes set out in *Clause 10* below;
  - 7.3. You agree for us to use cookies on your browser (pieces of information relating to your preferences sent by the Site to your browser and stored on your computer hard-drive). If, however, you do not want to receive cookies, you can disable this by changing your browser settings; and
  - 7.4. You agree that we can contact you with information about services offered by us which may be of interest to you (unless you have stated you do not wish to receive these communications as set out in *Clause 11.2* below).
8. Our Site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these websites.

### **Types of information collected**

9. We collect information from you at several points on our Site and/ or when you make a booking, examples of which include, but is not limited to:
  - 9.1. When you register as a member on our Site, search for a Product, make a booking on our Site, pay for the Services, post comments or reviews on our Site, and when you report a problem with our Site.
  - 9.2. When you fill in any forms on our Site or by corresponding with us by phone, e-mail or otherwise;
  - 9.3. technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
  - 9.4. information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

## **Purpose of information collected**

### 10. Purpose of Personal Data collection includes:

- 10.1. to successfully complete your booking of the Services, or otherwise implement our Terms and Conditions
- 10.2. to enable you to access and use our Site and Services;
- 10.3. to operate, protect, improve and optimize the Site, and our users' experience, such as to perform analytics, conduct research, and for advertising and marketing, so that you can enjoy a customized and personalized experience;
- 10.4. to create and maintain a trusted and safer environment on the Site, such as fraud detection and prevention, conducting investigations and risk assessments, verifying the address of your listings, verifying any identifications provided by you, and conducting checks against databases such as public government databases;
- 10.5. to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
- 10.6. to send you information about any of our services which may be of interest to you (unless you have indicated to us that you do not wish to receive marketing communication from us); and
- 10.7. to comply with our legal obligations, resolve any disputes that we may have with any of our Site users, and enforce our agreements with any third parties.

### 11. Use of Personal Data in Direct Marketing

- 11.1. Where you have consented to us using your Personal Data in direct marketing, please note that:
  - 11.1.1. Your Personal Data including, but not limited to, your name, address, telephone number, e-mail address, transaction behavior and demographic data held by us from time to time may be used by us in direct marketing;
  - 11.1.2. The following classes of services may be marketed:
    - 11.1.2.1. Related services and products offered by us; and

11.1.2.2. reward, loyalty, privileges or co-branding programmes and related services and products.

11.2. If you no longer wish for us to use your Personal Data for use in direct marketing as described above, please let us know in writing by emailing us at [info@nowboat.com](mailto:info@nowboat.com)

### **Who do you share your information with?**

12. We may disclose your Personal Data to third parties including, but not limited to:

12.1. any Providers;

12.2. professional advisors; and

12.3. data processing companies engaged by us,

for the purposes as set out in *Clause 10*.

### **Retention of Personal Data**

13. We take all practicable steps to:

13.1. Ensure the accuracy of Personal Data and to erase such Personal Data after fulfillment of the purposes as set out in this Policy;

13.2. Erase the Personal Data no longer required for the purposes as set out in this Policy unless prohibited under any law or public interest requires otherwise;

13.3. Ensure that Personal Data is protected against unauthorized or accidental access, processing, erasure, loss or use other than such purpose as set out in this Policy; and

13.4. Ensure that Personal Data will be kept in a secure manner and not be kept longer than necessary for the purposes as set out in this Policy.

### **Data Access and Correction**

14. You have the right to:

14.1. Check whether we hold any Personal Data about you and access such Personal Data;

- 14.2. Require us to correct any Personal Data relating to you which is inaccurate; and
- 14.3. Ascertain our policies and practices in relation to Personal Data and to be informed of the kind of Personal Data held by us.
15. Any request for access to data or correction of data are to be addressed to us at [info@nowboat.com](mailto:info@nowboat.com)
16. In accordance with the Personal Data (Privacy) Ordinance, we have the right to charge a reasonable fee for the processing of any Personal Data access request.