

1. PRIVACY AND COOKIE POLICY

- 1.1 ATI TRAVEL NZ is committed to ensuring compliance with the New Zealand Privacy Act 1993 and the European Union's General Data Protection Regulation (**GDPR**).
- 1.2 ATI TRAVEL NZ's Privacy Policy applies to anyone who visits the ATI TRAVEL NZ Website or uses ATI TRAVEL NZ's Services. From time to time, ATI TRAVEL NZ may change this Privacy Policy and will post the changes on the ATI TRAVEL NZ Website. If You don't agree with the changes to the Privacy Policy then You may not be able to fully use ATI TRAVEL NZ's Website and Services.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website, we will ask you to consent to our use of cookies when you first visit our website.

2. WHAT ATI TRAVEL NZ COLLECTS

- 2.1 ATI TRAVEL NZ may collect from You:
 - (a) Your Personal Information, including:
 - (i) Your Sensitive Information;
 - (ii) Your name;
 - (iii) Your contact information, including email address;
 - (iv) other information relevant to surveys or interviews You participate in and/or offers You accept; and
 - (v) information about Your preferences and activities on ATI TRAVEL NZ Website; and
 - (b) Personal Information (including Sensitive Information) about anyone else that You give to ATI TRAVEL NZ.
- 2.2 When You disclose Your Personal Information to ATI TRAVEL NZ it must be accurate, complete, up-to-date and not misleading. If You give ATI TRAVEL NZ Personal information about someone else, then You must be authorised to do so and You must tell that person about this Privacy Policy.

3. HOW ATI TRAVEL NZ COLLECTS YOUR PERSONAL INFORMATION

- 3.1 ATI TRAVEL NZ collects Your Personal Information only when needed and for lawful purposes connected with performing its functions or activities. You authorise the collection of Your Personal Information from ATI TRAVEL NZ when You:
 - (a) Use the ATI TRAVEL NZ Services on Your computer, mobile, tablet or any other electronic device;
 - (b) Create a user account with ATI TRAVEL NZ;
 - (c) communicate with ATI TRAVEL NZ;
 - (d) enter into any ATI TRAVEL NZ competitions and/or promotions.
- 3.2 ATI TRAVEL NZ may also collect Your Personal Information from publicly available sources or from Third Parties from time to time.

- 3.3 Please do not supply any other person's personal data to us, unless we prompt you to do so.

4. HOW ATI TRAVEL NZ WILL USE YOUR PERSONAL INFORMATION

- 4.1 You authorise ATI TRAVEL NZ to use Your Personal Information (and where necessary), to disclose Your Personal Information to Third Parties for the following Purposes:
- (a) for the Purposes of providing You with the ATI TRAVEL NZ Services, including to:
 - (i) communicate with You, including to send promotional emails about new services, special offers, promotions or other information;
 - (ii) respond to Your queries regarding the ATI TRAVEL NZ Website or Services;
 - (iii) verify Your identity when You create a user account with ATI TRAVEL NZ;
 - (iv) administer Your account;
 - (v) provide You with a good user experience;
 - (vi) develop new Services, features and/or Content; and
 - (vii) keep You updated on things that are happening at ATI TRAVEL NZ;
 - (b) for internal record keeping purposes;
 - (c) to the extent necessary to perform the purposes specified in this Privacy Policy and to allow for the operation of ATI TRAVEL NZ's business activities and functions;
 - (d) for any other purposes You authorise;
 - (e) for the purpose of ATI TRAVEL NZ selling all or most of ATI TRAVEL NZ's assets; and
 - (f) to comply with ATI TRAVEL NZ's Legal Obligations.
- 4.2 You agree that ATI TRAVEL NZ may share Your Personal Information with Third Parties to fulfil business transactions for the purposes specified in this Privacy Policy (for example providing customer services, sending marketing communications, and providing maintenance services).

5. HOW LONG ATI TRAVEL NZ HOLDS YOUR PERSONAL INFORMATION

ATI TRAVEL NZ will hold Your Personal Information for as long as Your Personal Information is required for the Purposes and for as long as is necessary to comply with its Legal Obligations.

6. HOW ATI TRAVEL NZ STORES AND PROTECTS YOUR PERSONAL INFORMATION

ATI TRAVEL NZ will use reasonable care to protect Your Personal Information from unauthorised access, use, modification, disclosure, and loss.

- (a) We have offices and facilities in New Zealand. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.

- (b) The hosting facilities for our website are situated in New Zealand and the United States of America. The European Commission has made an "adequacy decision" with respect to the data protection laws of each of these countries. Transfers to each of these countries will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission.
- (c) You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

7. **ATI TRAVEL NZ MAY TRANSFER YOUR PERSONAL INFORMATION TO OTHER COUNTRIES**

In order to provide You with ATI TRAVEL NZ Services, ATI TRAVEL NZ may need to disclose and transfer Your Personal Information to Third Parties located in a different country from where You live. This may include countries located outside the European Economic Area (**EEA**). If those countries do not have data protection laws comparable to the data protection laws of Your country of residence, then ATI TRAVEL NZ will take reasonable steps to ensure that Your Personal Information (including any Sensitive Information) is protected in those countries.

8. **FOR THE PURPOSE OF THE GDPR**

8.1 ATI TRAVEL NZ is the data controller for personal data collected by it in the provision of its Services, support and assistance to You as the user. If ATI TRAVEL NZ uses personal data that has been collected by a Third Party it will process the information as a data processor on behalf of the Third Party that collected Your Personal Information.

8.2 **Request access to Your Personal Information:** You have the right to request access to any Personal Information that ATI TRAVEL NZ holds about You, the right to know the source of Your Personal Information and the processing methods used by ATI TRAVEL NZ. If ATI TRAVEL NZ cannot give You access to the Personal Information that You have requested, then ATI TRAVEL NZ will let You know the legal reasons for not disclosing Your Personal Information. If You are not happy with the legal reasons provided, then You have the right to complain to the New Zealand Privacy Commissioner: www.privacy.org.nz/your-rights/how-to-complain/.

8.3 **Request correction of Your Personal Information:** You have the right to request correction of the Personal Information that ATI TRAVEL NZ holds about You. ATI TRAVEL NZ will correct Your Personal Information if it is necessary to ensure that Your Personal Information is accurate, up to date, complete and not misleading. If ATI TRAVEL NZ decides that it is unnecessary to correct Your Personal Information, ATI TRAVEL NZ will let You know the legal reasons for its decision. If You are not happy with those reasons, then You have the right to complain to the New Zealand Privacy Commissioner: www.privacy.org.nz/your-rights/how-to-complain/.

8.4 **Request to restrict the use and processing of or delete Your Personal Information:** You have the right to request that ATI TRAVEL NZ delete Your Personal Information when it is no longer needed for the Purposes, or withdraw your authorisation for ATI TRAVEL NZ to use Your Personal Information. You also have the right to restrict Your Personal Information from being processed in the event You consider Your rights and freedoms outweigh our legitimate interests in using Your Personal Information.

8.5 **Data portability:** You have the right to request that ATI TRAVEL NZ transfer Your Personal Information from one electronic processing system to another electronic processing system.

9. **MINORS**

ATI TRAVEL NZ does not knowingly collect Personal Information from children (as defined by local laws) and does not target its Website and/or Services towards

children.

10. WHAT HAPPENS IF YOU DON'T GIVE ATI TRAVEL NZ YOUR PERSONAL INFORMATION

If You decide not to give ATI TRAVEL NZ Your Personal Information, or otherwise wish to withdraw your authorisation at any time, then You:

- (a) may not be able to use some of the ATI TRAVEL NZ Website and Services;
- (b) won't be kept updated on things that are happening at ATI TRAVEL NZ.

11. PRIVACY COMPLAINTS

If You think that Your privacy rights have been breached, You can make a written complaint to ATI TRAVEL NZ at joji@atitravel.nz, or otherwise contact the NZ Privacy Commissioner at <https://www.privacy.org.nz/your-rights/making-a-complaint/complaint-form/>.

12. COOKIES

12.1 A cookie is a small file that can be placed on Your computer, mobile, tablet or any other electronic device when You visit the ATI TRAVEL NZ Website. Cookies allow the Website to recognise Your device. ATI TRAVEL NZ may use cookies in order to make it easier to use the ATI TRAVEL NZ Website and to help ATI TRAVEL NZ to analyse the profile of visitors and users in order to improve usability and features of the ATI TRAVEL NZ Website and Services.

12.2 There are two types of cookies used by ATI TRAVEL NZ: **Session cookies**. These are used to store information about Your activities so You can move from one webpage to another. These cookies track Your movement from webpage to webpage of a website so that You do not have to provide the same information provided on earlier webpages. Session cookies only remain in the cookie file of Your browser until You close the browser.

- (a) **Persistent cookies**. These are used to store Your preferences to improve Your experience on future visits to the ATI TRAVEL NZ Website. For example, these cookies can remember log-in details or language preferences so that You don't have to continually re-enter these each time You visit the website. Persistent cookies stay in the cookie file of Your browser after You have closed Your browser, and activate again when You next visit that website.
- (b) **Security** - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website generally;
- (c) **Advertising** - we use cookies to help us to display advertisements that will be relevant to you;
- (d) **Analysis** - we use cookies to help us to analyse the use and performance of our website; and
- (e) **Cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally.
- (f) The full list of cookies we use is;

Cookie	Type	Purpose
PHPSESSID	Session	The main session cookie set by the website.
NID	Persistent	Google advertising cookie used to personalise ads
_ga	Persistent	on Google search pages
_gid	Persistent	Google Analytics tracking. Code: UA-64449717-1
_gat	Persistent	Google Analytics tracking
PREF	Persistent	Youtube cookie

YSC	Session	Youtube session cookie
VISITOR_INFO1_LIVE	Persistent	Youtube cookie
test_cookie	Session	Test cookie set by Google's doubleclick.net
uid	Persistent	Tracking cookie used by turn.com and tynt.com
__sharethis_cookie_test_		No information available – assumed to be test
–	Session	session cookie used by Sharethis.com
fr	Persistent	Facebook tracking cookie
__stid	Persistent	Sharethis.com tracking cookie.
BizOId	Persistent	Linkedin tracking cookie
lang	Session	Linkedin social tracking cookie
lidc	Session	Linkedin social tracking cookie
UserMatchHistory	Persistent	Linkedin social tracking cookie
bcookie	Persistent	Linkedin social tracking cookie
bscookie	Persistent	Linkedin social tracking cookie
test_cookie	Session	Test cookie set by Google's doubleclick.net

12.3 To enable some of the features and functionality of the ATI TRAVEL NZ Website, You will need to permit ATI TRAVEL NZ to place cookies on Your device. If You choose not to, then those features and functionality will not be available to You. You can remove or block cookies by using the settings in Your browser but it may affect Your ability to use the ATI TRAVEL NZ Website.

13. Cookies used by our service providers

- (a) Our service providers use cookies, and those cookies may be stored on your computer when you visit our website.
- (b) We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

14. Managing cookies

14.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can, however, obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

15. DEFINITIONS

“ATI TRAVEL NZ” means Independent All Things India LTD (NZ registered) and trading as “All Things Intriguing Travel New Zealand”.

“ATI TRAVEL NZ Services”: means any products, services, software, Content, features, functionalities and any other services provided to You via the ATI TRAVEL NZ Website;

“ATI TRAVEL NZ Website” means the website (or websites) located at www.ATI TRAVEL NZ.co.nz operated by ATI TRAVEL NZ from time to time;

“Content” means all content delivered via the ATI TRAVEL NZ Website and Services including all text, software, scripts, graphics, photos, sounds, music, videos, audio-visual works or combinations of works, live streaming, interactive features and other materials;

“including” means “including without limitation”;

“Legal Obligations” means any legal or regulatory obligation that ATI TRAVEL NZ has under the laws of any relevant any country in relation to the collection, use, disclosure, storage or processing of Your Personal Information;

“Personal Information” means any information that can be used to directly or indirectly identify an individual, and includes Sensitive Information, and references to “Your Personal Information” also includes any Personal Information that You provide to ATI TRAVEL NZ about someone else;

“Purposes” means the purposes for which Your Personal Information is used and disclosed as specified in this ATI TRAVEL NZ Privacy Policy;

“Sensitive Information” means information about Your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sexual orientation;

“Third Parties” means any person, company, body corporate, entity, governmental or regulatory authority in any country;

“You” means you as an individual and **Your** has a corresponding meaning.