

# Privacy Policy

(Last updated July 5, 2021)

## PLEASE READ THIS PRIVACY STATEMENT CAREFULLY

Swimbooker respects every user's privacy, and we are committed to being transparent with you about how we handle personal data. This Privacy Policy explains how Swimbooker collects, shares, and uses personal data you provide to us when using the Swimbooker or Website or otherwise interacting with us. We also offered some sections for you to learn how you can exercise your privacy rights and choices.

Please read this Privacy Policy carefully before accessing our Website and using Swimbooker Services. If you have any questions regarding this information or our privacy practices, please contact us at [info@swimbooker.com](mailto:info@swimbooker.com)

### 1. Overview

Swimbooker ("we," "us," or "Our") respects the privacy rights of its users and understands the importance of protecting and handling information collected about you under both the law and best practice. This Privacy Notice is written to comply with the United Kingdom Data Protection Act and Article 13 and Article 14 of EU General Data Protection Regulation, i.e., Regulation (EU) 2016/679 ("GDPR").

This Privacy Notice applies to personal information which we process relating to people who have:

- Registered for an account with us;
- Making a booking on our Website
- agreed to receive marketing information from us;
- participate in surveys;
- contact us for inquires and support

This Privacy policy also describes what rights you have regarding your data, how you give your consent, and how you can withdraw your consent. Swimbooker (together with its affiliates, the "Swimbooker") owns and operates this Website and services, including, without limitation, Swimbooker.com and others (collectively, the "Swimbooker Website"). This privacy policy ("Privacy Policy") applies to Swimbooker



Website and all of the features, including the services: any mobile applications, emails, online services, and other functionalities, whether accessed via a computer, mobile device, or otherwise and the services available on or through the Swimbooker Website and (the "Services").

- 1. Overview**
- 2. Acceptance And Use**
- 3. Who We Are**
- 4. Summary of Personal Information and Use**
- 5. Purposes of Data Collection**
- 6. Data Protection Principles**
- 7. Types Of Data We Collect From You**
- 8. How We Use Your Data**
- 9. With Whom We Share Your Data**
- 10. Data Subjects**
- 11. Your Data Privacy Rights and Choices**
- 12. Data Security**
- 13. Terms and Conditions**
- 14. Jurisdiction**
- 15. Changes to our Privacy Policy**
- 16. Contact Us**

## **2. Acceptance And Use**

This Privacy Policy covers Swimbooker and its subsidiaries, including (collectively, "www.Swimbooker.com we, us, or our). Using our Website, you signify acceptance of the terms of this Privacy Policy, which is considered your official consent to process your personal information, consent to the collection, use, and disclosure of your data, as described further below.

Suppose you are not comfortable with any aspect of this Privacy Policy. You should immediately discontinue any access to the Swimbooker website and services.

## **3. Who We Are**

Swimbooker operates an online marketplace for the leisure fishing industry in which consumers, a.k.a Anglers, can make booking for a private lake venue (named 'Fisheries') via the Swimbooker website. Please read all private lake descriptions and



warnings carefully before making your booking, or perhaps do your research before booking a private lake venue. Swimbooker provides this website as the facilitator and not the private lake owner.

#### **4. Summary of Personal Information and Use**

We may collect or obtain Personal Data about you, and this information may be stored or processed out of your region through the following methods listed in this Privacy Policy. "Personal Data" means data, whether true or not, about an individual who can be identified from that data. Common examples of personal data could include name, identification number, and contact information.

#### **5. Purposes of Data Collection**

The following are examples of how we use your Personal Information:

- **Provision of Services**
- **Creating an account for you**
- **Completing your Booking**
- **Offering and Improving the Website**
- **Surveys**
- **Communication**
- **User Engagement**
- **Legal Compliance**

#### **6. Data Protection Principles**

We collect, process, and use personal data (under the definitions of the United Kingdom Data Protection Act and Article 13 and Article 14 of EU General Data Protection Regulation, i.e., Regulation (EU) 2016/679 ("GDPR") to provide our services. Personal data means any information that enables us to identify you, directly or indirectly, such as name, email, address, health information, any form of identification number, or one or more factors specific to you or your beneficiary's identity.

We are committed to complying with applicable data protection laws and will ensure that personal data is:

- Used lawfully, fairly, and transparently;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;



- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about;

## 7. Types Of Data We Collect From You

We may collect and process the following personal information about you:

- **Personal Profile Information.** If you register an account with us, we will collect the following from you;
  - name;
  - email address;
  - date of birth;
  - bank account and payment information
  - telephone number;
- **Correspondence Data.** Any correspondence you send us.
- **Usage Data.** We also collect usage data about you whenever you interact with our services. These may include which web pages you visit, what you click on when you performed those actions, and so on. We collect data from the device and application you use to access our services, such as your IP address, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time, and clickstream data.

We may also collect your geographic location based on your IP address. Suppose you arrive at a Swimbooker service from an external source (such as a link on another website contained in an email). In that case, we may use this information to analyze trends, administer the site, track users, and gather demographic information about our user base as a whole.

## 8. How We Use Your Data

We will only use your data when the law allows us to. Most commonly, we will use your data in the following circumstances, but for more information about the types of lawful basis that we will rely on to process your data

- Provide our services to you
- Process your Booking for Delivery
- Conduct further analysis on research data we have already collected;
- In aggregated form to help us explain our research capabilities to our clients.



- Request you to update your profile,
- Invite you to participate in surveys about our products or services
- Monitor, detect and prevent fraud, improper activity and ensure Swimbooker's policy compliance
- Conduct research including secondary and follow-on research
- Evaluate how you and other users interact with our online services
- Protect Swimbooker and our users
- Conduct audits related to our current interactions with you
- Debug the site and service to identify and repair errors that impair existing intended functionality
- Defend ourselves in litigation and investigations and prosecute litigations
- To comply with legal and regulatory obligations.

## 9. With Whom We Share Your Data

Swimbooker only shares your personal information with third parties under the circumstances described below. We do not sell or otherwise disclose personal information we collect about you for monetary or other valuable consideration.

- **Authorized vendors:** We may share your data with third-party vendors that help us operate our Website, process payments, deliver our services, and comply with your instructions and contractual obligations. These include payment processors, content delivery networks (CDNs), cloud-based hosting services, monitoring services, email service providers, quality assurance and testing vendors, fraud and abuse prevention vendors, customer relations management (CRM), vendors
- **Advertising and Analytics Partner:** We may share usage data with third-party advertisers and analytics providers through cookies and other similar technologies. These third parties may collect information sent by your computer, browser, or mobile device in response to a request for content, such as unique identifiers, your IP address, or other information about your computer or device.
- **Certain legal obligations:** Swimbooker may be required to disclose personal information if directed by a court of law or other governmental entities. We will attempt to give you prior notice before disclosing your information in response to such a request.



## 10. Data Subjects

For individuals who are located in the European Economic Area, or Switzerland (collectively "EEA Residents"), data collected from you may be transferred or processed in the United Kingdom (Collectively "Data Subjects"). When your data is collected, we rely on legal bases for processing your information. We generally only process your data where we are required to, where the processing is necessary to provide our services to you (or to take steps at your request before entering into a contract with you).

## 11. Your Data Privacy Rights and Choices

We enable you to make numerous choices about your data: Below is the following data protection rights you have when using our services. You may choose not to provide us with certain information.

- **Right to update or correct:** Suppose you wish to access, correct, update or request deletion of your personal information. In that case, you can do so at any time by contacting us through the customer services portal or at the information provided at the bottom of this Privacy Policy.
- **Right to access your data:** If you request access to your data, we will confirm whether we hold your information and provide you with a copy, explaining how we process it and why, how long we store it for, and your rights associated with it.
- **Right to Delete your Data:** If you request the deletion of your personal information, we will erase it. Please note that we will need to retain any information required to fulfill our legal obligations or establish, exercise, or defend a legal claim.
- **Right to Restrict the processing of your data:** You can ask us to restrict your personal information or request the portability of your personal information. Again, you can exercise these rights by contacting us through the customer services portal or at the information provided at the bottom of this Privacy Policy.
- **Right to opt-out from receiving marketing emails:** You have the right to opt-out of the email marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. We will process your request within a reasonable time after receipt.
- **Withdraw Your Consent:** Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any



processing we conducted before your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- **Right to Complaint:** You have the right to complain to a data protection authority about our collection and use of your personal information. Please contact us for more information, and we will send you a link or our data protection officer's address.

The easiest way to submit your request to us is through our Customer support email found at the bottom of this Privacy Policy. We respond to all requests from individuals wishing to exercise their data protection rights under applicable data protection laws.

## **12. Data Security**

We are committed to maintaining your data's security, having measures in place to protect against the loss, misuse, and alteration of the data under our control. We employ modern and secure techniques to protect our systems from intrusion by unauthorized individuals, and we regularly upgrade our security as better methods become available. Our data centers and our partners utilize new physical security measures to prevent unauthorized access to the facility.

Please be aware that no security measures are perfect or impenetrable. Therefore, although we use industry-standard practices to protect your privacy, we cannot (and do not) guarantee the absolute security of personal data.

## **13. Terms and Conditions**

Please visit our Terms of Service page to learn more about our terms and conditions, which establishes the use and disclaimer governing our Website's usage.

## **14. Jurisdiction**

The United Kingdom laws shall govern this privacy policy and other related services.

## **15. Changes To our Privacy Policy**

Swimbooker continually strives to implement new technologies and processes to protect you better, your privacy, and your use of the Swimbooker service. As a result, changes to this privacy policy may be made by Swimbooker from time to time. In no



event will these changes result in the degradation of any security measures designed to protect you from unauthorized disclosure.

## **16. Contact Us**

If you have any questions about this privacy policy, please contact us at [info@swimbooker.com](mailto:info@swimbooker.com).

