

Privacy Statement and Cookie Statement

Classic Escapes, a subsidiary of Dhiaan Global Associates LLP. (“we” or “us”) values you as our customer and recognizes that privacy is important to you. This Privacy Statement explains how we collect, use, and disclose data when you use our platform and associated services, your rights in determining what we do with the information that we collect or hold about you and tells you how to contact us.

Last Updated: 14 Aug 2022

Privacy Statement Summary

What does this **Privacy Statement** cover?

This Privacy Statement is designed to describe:

- How and what type of personal information we collect and use
- When and with whom we share your personal information
- What choices you can make about how we collect, use, and share your personal information
- How you can access and update your information.

What personal information do we collect and use, and how do we collect it?

We collect personal information when:

- You give us the information
- We collect it automatically
- We receive it from others

When you create an account or sign-up to receive offers or information on one of our sites, or make a booking using our platform, you give us your personal information. We also collect such information through automated technology such as cookies placed on your browser, with your consent where applicable, when you visit our sites. We also receive information from affiliated companies within Dhiaan Global Associates LLP, as well as business partners and other third-parties, which help us improve our platform and associated tools and services, update and maintain accurate records, potentially detect and investigate fraud, and more effectively market our services.

How is your personal information shared?

Your personal information may be shared to help you book your travel and/or vacation, assist with your travel and/or vacation stay, communicate with you (including when we send information on products and services or enable you to communicate with travel providers and/or property owners), and comply

with the law. The full Privacy Statement details how personal information is shared below.

What are your rights and choices?

You can exercise your data protection rights in various ways. For example, you can opt out of marketing by clicking the “unsubscribe” link in the emails, in your account as applicable, or contacting our customer service.

Our Privacy Statement has more information about the options and data protection [rights and choices](#) available to you.

How to contact us

More information about our privacy practices is in our full [Privacy Statement](#). You can also contact us as described below in the “[Contact Us](#)” section to ask questions about how we handle your personal information or make requests about your personal information.

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Categories of Personal Information We Collect

When you use our platform, or associated tools or services, we may collect the following kinds of personal information from you as needed:

- Name, username, email address, telephone number, and home, business, and billing addressees (including street and pincode)
- Government issued Identification required for booking or identity verification, such as passport, driver’s license, Aadhar, and country of residence (for travel insurance purposes), and for vacation property owners, tax identification number,

- Payment information such as payment card number, expiration date, billing address, and financial account number
- Travel-related preferences and requests such as favourite destination and accommodation types, and special dietary and accessibility needs, as available
- Loyalty program and membership information
- Birth date and gender
- Geolocation
- Images (including facial photographs), videos, and other recordings
- Social media account ID and other publicly available information
- Communications with us (such as recordings of calls with customer service representatives for quality assurance and training purposes)
- Searches you conduct, transactions, and other interactions with you on our online services
- The searches and transactions conducted through the platform
- Data you give us about other people, such as your travel companions or others for whom you are making a booking
- Information we receive about you from other third parties such as our business and affiliate partners and authorized service providers which may include updated contact information, demographic information, interests, and purchase history, which we may add to your account or profile and use for market research and analysis

Use of Personal Information

We use your personal information for various purposes described below, which depend on the site you visit.

Your Use of Online Sites, Apps, and Services:

- Book the requested travel or enable vacation property booking
- Provide services related to the booking and/or account
- Create, maintain, and update user accounts on our platform and authenticate you as a user
- Maintain your search and travel history, accommodation, and travel preferences
- Enable and facilitate acceptance and processing of payments, coupons, and other transactions
- Administer loyalty and rewards programs
- Collect and enable booking-related reviews

Communications and Marketing:

- Respond to your questions, requests for information, and process information choices

- Enable communication between you and the travel supplier like hotels and vacation property owners
- Contact you (such as by text message, email, phone calls, mail, push notifications, or messages on other communication platforms) to provide information like travel booking, confirmations and updates, for marketing purposes, or for other purposes as described in this Privacy Statement
- Market our products and services, optimize such marketing to be more relevant to you, and measure and analyse the effectiveness of our marketing and promotions

Other Business Purposes and Compliance

- Conduct surveys, market research, and data analytics
- Maintain, improve, research, and measure the effectiveness of our sites and apps, activities, tools, and services
- Monitor or record calls, chats, and other communications with our customer service team and other representatives, as well as platform communications between or among partners and travellers for quality control, training, dispute resolution, and as described in this Privacy Statement
- Create aggregated or otherwise anonymized or deidentified data, which we may use and disclose without restriction where permissible
- Promote security, verify identity of our customers, prevent, and investigate fraud and unauthorized activities, defend against claims and other liabilities, and manage other risks
- Comply with applicable laws, protect our and our users' rights and interest, defend ourselves, and respond to law enforcement, other legal authorities, and requests that are part of a legal process
- Comply with applicable security and anti-terrorism, anti-bribery, customs and immigration, and other such due diligence laws and requirements
- Operate our business using lawful business purposes and as permitted by law

Lawful bases for processing:

We will collect personal information from you only

- (i) where the personal information is necessary to perform a contract with you (e.g., manage your booking, process payments, or create an account at your request)
- (ii) Where the processing is in our legitimate interests and not overridden by your rights (as explained below), or
- (iii) Where we have your consent to do so (e.g., sending you marketing communications where consent is required). In some cases, we will have a legal obligation to collect personal information from you such

as where it is necessary to use your transaction history to complete our financial and tax obligations under the law.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

We may in some cases use automated decision-making, for example, in relation to assessing fraudulent transactions or suspicious activity on our site. As part of this processing, automated decisions may be made by putting your personal information into a system and the decision is calculated using automatic processes. If you pose a fraud risk, this may affect your ability to book on our site. You may have rights in relation to automated decision making, including the ability to request a manual decision-making process instead or contest a decision based solely on automated processing.

If you want to know more about your data protection rights, please see the [Your Rights and Choices](#) section below.

Sharing of Personal Information

We share your personal information as described below and in this Privacy Statement, and as permitted by applicable law.

- **Classic Escapes.** We share your personal information within the Dhiaan Global Associates LLP companies, listed at <https://www.classicescapes.in/>. Dhiaan Global Associates LLP share, access and use your personal information as described in this Privacy Statement.
- **Third-party service providers.** We share personal information with third-parties in connection with the delivery of services to you and the operation of our business (for example, to provide credit card processing, customer service, business analytics, and fraud prevention and compliance services, and to serve you with advertising tailored to your interests). These third-party service providers are required to protect personal information we share with them and may not use any directly identifying personal information other than to provide services we contracted them for. They are not allowed to use the personal information we share for purposes of their own direct marketing (unless you have separately consented with the third-party under the terms provided by the third-party).

- **Travel suppliers.** We share personal information with travel-related suppliers such as hotels, airlines, car-rental companies, insurance, vacation-rental property owners and managers, and where available, activity providers, rail, or cruise lines who fulfill your booking. Please note that travel suppliers may contact you to obtain additional information if and as required to facilitate your booking or to otherwise provide the travel or associated services.
- **Business partners and offers.** If we promote a program or offer a service or product in conjunction with a third-party business partner, we will share your information with that partner to assist in marketing or to provide the associated product or service. In most of those cases, the program or offer will include the name of the third-party business partner, either alone or with ours, or you will be redirected to the website of that business with notice. An example of such a business-partner relationship would be a third-party loyalty program for which you could earn points by completing a booking on our platform.
- **Other Third-Parties.** When you access certain features like Facebook's "Like" button or a single sign-on that allows you to login with your social media credentials to our online services, you will share information with the third-party, like a social media company, such as the fact that you have visited or interacted with us.
- **Legal rights and obligations.** We may disclose your personal information to enforce our policies, or where we are permitted (or believe in good faith that we are required) to do so by applicable law, such as in response to a request by a law enforcement or governmental authority, in connection with actual or proposed litigation, or to protect and defend our property, people and other rights or interests. We may also share your personal information pursuant to a subpoena or other legal request, or as necessary to remit certain taxes in the course of processing payments as required by law or legal process.
- **Corporate transactions.** We may share your personal information in connection with a corporate transaction, such as a divestiture, merger, consolidation, assignments or asset sale, or in the unlikely event of bankruptcy. In the case of any acquisition, we will inform the buyer it must use your personal information only for the purposes disclosed in this Privacy Statement.

Your Rights and Choices

You have certain rights and choices with respect to your personal information, as described below:

- If you have an account with us, you may change your communication preferences by either emailing us at info@d-globalassociates.com or contact our customer service.
- You can control our use of certain cookies by following the guidance in our [Cookie Statement](#) in this [Privacy Statement](#).
- If you no longer wish to receive marketing and promotional emails, you may unsubscribe by clicking the 'unsubscribe' link in the email or contacting our customer service. Please note that if you choose to unsubscribe from or opt out of marketing emails, we may still send you important transactional and account-related messages from which you will not be able to unsubscribe.
- If we are processing your personal information on the basis of consent, you may withdraw that consent at any time by contacting us. Withdrawing your consent will not affect the lawfulness of any processing that occurred before you withdrew consent and it will not affect our processing of your personal information that is conducted in reliance on a legal basis other than consent.

For questions about privacy, your rights and choices, and in order to make a request to amend or update your information, or to inquire about deletion, please contact our customer service.

In addition to the above rights, you may have the right to complain to a data protection authority about our collection and use of your personal information. However, we encourage you to contact us first so we can do our best to resolve your concern. You may submit your request to us using the information in the [Contact Us](#) section. We respond to all requests we receive from individuals wanting to exercise their personal data protection rights in accordance with applicable data protection laws.

Security

We want you to feel confident about using our platform and all associated tools and services, and we are committed to taking appropriate steps to protect the information we collect. While no company can guarantee absolute security, we do take reasonable steps to implement appropriate physical, technical, and organizational measures to protect the personal information that we collect and process.

Record Retention

We will retain your personal information in accordance with all applicable laws, for as long as it may be relevant to fulfill the purposes set forth in this Privacy Statement, unless a longer retention period is required or permitted by law.

We will deidentify, aggregate, or otherwise anonymize your personal information if we intend to use it for analytical purposes or trend analysis over longer periods of time.

The criteria we use to determine our retention periods include:

- The duration of our relationship with you, including any open accounts you may have with Classic Escapes, or recent bookings or other transactions you have made on our platform
- Whether we have a legal obligation related to your personal information, such as laws requiring us to keep records of your transactions with us
- Whether there are any current and relevant legal obligations affecting how long we will keep your personal information, including contractual obligations, litigation holds, statutes of limitations, and regulatory investigations

Cookie Statement

Types of cookies and similar technologies

Cookies

Cookies are small pieces of text sent as files to your computer or mobile device when you visit most websites. Cookies may be delivered by us (first party cookies) or delivered by a third-party partner or supplier (third-party cookies). Cookies are either session cookies or persistent cookies. Session cookies enable sites to recognize and link the actions of a user during a browsing session and expire at the end of each session. Persistent cookies help us recognize you as an existing user and these cookies are stored on your system or device until they expire, although you can delete them before the expiration date.

Other similar technologies

- **Web beacons, gifs, and clear gifs** are tiny graphics, each with a unique identifier that are embedded invisibly on sites and in emails. Web beacons allow us to know if a certain page was visited or if ad banners on our sites and other sites are effective. We also use web beacons in our HTML-based emails to let us know whether our emails have been opened by recipients, which helps us to gauge the effectiveness of certain communications, promotions, and marketing campaigns.
- **Pixels** are small objects embedded into a web page that are not visible to the user. We use pixels to deliver cookies to your computer, facilitate

the log-in process, monitor the activity on our sites, and deliver online advertising.

- **Tags** are small pieces of HTML code that tell your browser to request certain content generated by an ad server. We use tags to show you relevant advertising and promotions.
- **Scripts** are pieces of JavaScript code that launch automatically when certain webpages load, to determine whether users view associated advertisements.
- **Local Storage Objects**, such as HTML 5, are used to store content and preferences. Third-parties with whom we partner to provide certain features on our site to display advertising based upon your web browsing activity use Local Storage Objects to collect and store information.

All of the technologies described above will be collectively referred to in this Cookie Statement as “cookies”.

Classic Escapes’s use of cookies

we use cookies for a number of reasons, including to:

- Help us improve your experience when visiting our sites
- Fulfill transactions and ensure our sites perform as intended
- Remember your preferences, such as language, region, or currency
- Provide you with relevant advertising and analyse performance of the ads
- Enable you to return to previous travel searches
- Identify errors on our sites
- Help with data protection and potentially detect and investigate malicious or fraudulent activity
- Help us understand traffic to our site, including time and date of the visit, time and date of the last visit, and other information
- Analyse how well our sites are performing

Types of information collected by cookies

The types of information that we collect through cookies include:

- IP address
- Device ID
- Viewed pages
- Browser type
- Browsing information
- Operating system
- Internet Service Provider
- Whether you have responded to, or interacted with, an advertisement

- Referring or referred links or URLs
- Features used and activities engaged in on our sites and in our apps

See the [Categories of Personal Information We Collect](#) section above for more information on what types of information are collected automatically.

Types and functions of cookies

Essential Cookies

Certain cookies are required or “essential” for our sites to function as intended. Essential cookies are necessary for you to navigate our site and use certain features like logging in to your account and managing your bookings. These cookies are also used to remember security settings that allow access to particular content. Lastly, we use essential cookies to collect information on which web pages visitors go to most, so we can improve our online services. You are not able to opt out of essential cookies.

Other Types of Cookies

We also use other types of cookies to make our site engaging and useful to you:

- **Functional Cookies.** We want to make sure when you visit our site, your preferences (such as your preferred language), settings, and previous searches are remembered.
- **Analytics Cookies.** We use analytics cookies to:
 - Understand our site’s performance and how it is used, including the number of visitors, how long you stay on the site, and which parts of the site you visit. We can see details about how visitors interacted with the site, like the number of clicks visitors made on a given page, their mouse movements and scrolling activity, the search words visitors used, and the text visitors enter into various fields
 - Test different designs and features for our site
 - Monitor how our visitors reach our sites
 - Determine effectiveness of our advertising
 - Improve our services, including your experience on our site

For analytics, our third-party service providers may use cookies to perform their services and may combine the information that they collect about you on our sites with other information that they have collected. For example, we use Google analytics cookies to monitor the performance of our sites. Our ability to use and share information collected by Google Analytics about your visit to our sites is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. This Cookie Statement does not cover such third-parties’ use of your information.

Some analytics cookies can perform tasks essential and/or functional to online services like enabling site improvements and testing changes on a site.

- **Advertising Cookies.** Classic Escapes and our third-party advertising partners may use advertising cookies to show you advertisements both on and off our sites that are based on your interests. We may allow third-parties to collect information about your online activities through cookies to perform their services and may combine the information that they collect about you on our sites with other information that they have collected. These third-parties include business partners who collect information when you view or interact with one of (1) their advertisements on our sites or (2) our advertising or booking information on their sites and advertising networks, which collect information about your interests when you view or interact with one of the advertisements or tracking mechanisms they place on many different sites on the Internet. Our partners may make assumptions about your interests, characteristics, or preferences and add you to groups based on those assumptions in order to show you tailored advertisements. Classic Escapes does not have access to the cookies these third-parties may use to collect information about your interests, and the information practices of these third-parties are not covered by this Cookie Statement, part of our [Privacy Statement](#).

Your information choices

You can choose not to receive tailored online advertising on this site and other sites and learn more about opting out of having your information used for tailored advertising purposes by accessing one of the following resources:

- For EEA, Switzerland, and UK: <http://www.youronlinechoices.eu/>
- For Canada: <http://youradchoices.ca/choices/>
- For U.S. and rest of world:
 - o <http://www.aboutads.info/choices/>
 - o <http://optout.networkadvertising.org/>

Note that if you choose not to receive tailored ads, you will still see online advertisements, but they will be general and less relevant to you.

How can you manage your cookies?

You can set or amend your web browser controls to accept or refuse cookies whenever you like, but please remember if you do choose to reject cookies, your access to some of the functionality and areas of our site may be restricted.

Do-Not-Track Signals and Similar Mechanisms.

Some web browsers may transmit "do-not-track" signals to sites with which the browser communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether users are even aware of them. Participants in the leading Internet standards-setting organization that is addressing this issue are in the process of determining what, if anything, sites should do when they receive such signals. We currently do not take action in response to these signals. If and when a final standard is established and accepted, we will reassess our sites' responses to these signals and make appropriate updates to this Cookie Statement.

Contact Us

If you have any questions or concerns about our use of your personal information, or wish to inquire about our personal handling practices, please contact our customer service at customerservices@classicescapes.in

Updates to Statement

We may update this Statement in response to changing laws or technical or business developments. If we propose to make any material changes, we will notify you by means of a notice on this page. You can see when this Statement was last updated by checking the last updated" date displayed at the top of this Statement.