

# Privacy Policy

This Privacy Policy describes how Marathon Tours & Travel Inc. (trading as Tri Travel US, Sportive Breaks US and Marathon Tours & Travel, collectively, “Marathon Tours”, “Tri Travel US”, “Sportive Breaks US, “we,” “us,” or “our”) collects, uses, shares, and protects personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions.

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## **Information We Collect**

We collect information about you in a variety of ways depending on how you interact with us and our websites and services, including:

- Directly from you when you provide it to us, such as when you register for an account, sign up to receive communications from us, place an order, or contact us by phone, email, or otherwise.
- Automatically through the use of cookies, server logs, and other similar technologies when you interact with our websites, and emails.
- From other sources, including, for example, our affiliates, business partners, service providers, and other third parties, or from publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

The following provides examples of the type of information that we collect in a variety of contexts and how we use that information.

<b>Context</b>	<b>Types of Data</b>	<b>Primary Purpose for Collection and Use of Data</b>
<b>Traveler Account</b>	We collect your name and contact information when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We have a legitimate interest in providing account related functionalities to our users. Accounts can be used for easy checkout and to save your preferences and transaction history. In some cases, we use account information to complete our contract to provide you with services.  If you choose not to provide this information you will not be able to create an account with us, but this will not affect your use of those functions that do not require registration/login.

<b>Customer Information</b>	We collect the name, and contact information, of our customers and with whom we may interact (including team members). We may also collect government ID and health information if needed to provide the services.	We have a legitimate interest in contacting our customers and communicating with them concerning normal business administration such as projects, services, and billing. In some cases, we use this information to complete our contract to provide you with services.  If a customer chooses not to provide this information, we may not be able to conduct business with that customer.
<b>Cookies and First-Party Tracking</b>	We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a website is viewed. See our <a href="#">Cookie Policy</a> for more information.	We have a legitimate interest in making our website operate efficiently.  If you choose not to provide this information our website may not operate properly which may affect the basic functions of using our platform.
<b>Cookies and Third-Party Tracking</b>	We may place tracking technology on our website that collects analytics and records how you interact with our website. This means that a third party uses technology (e.g., a cookie) to collect information about your use of our website so that they can report analytics to us. See our <a href="#">Cookie Policy</a> for more information.	Where required by law, we base the use of third-party cookies upon consent.  If you choose not to provide this information this will not affect the basic functions of using our platform or purchasing our services.
<b>Demographic Information</b>	We collect personal information, such as your age, location, and preferences.	We may use this information to complete our contract to provide you with services. We also have a legitimate interest in understanding our users and providing tailored services.  If you choose not to provide this information, we may not be able to complete your travel booking.
<b>Email Interconnectivity</b>	If you receive an email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We have a legitimate interest in understanding how you interact with our communications to you.  If you choose not to provide this information, it will not affect your basic functions of using our platform or purchasing our services.
<b>Employment</b>	If you apply for a job posting, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your government ID. Providing this information is required for employment.	We use this information to process your job application and with your consent. In some contexts, we are also required by law to collect information about employees or applicants. We also have a legitimate interest in using your information to have efficient staffing and work force operations.
<b>Feedback/Support</b>	If you provide us feedback or contact us for support we will collect your name and email address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or issues.  If you choose not to provide this information, we may be unable to respond to your requests or questions, but this will

		not affect your basic functions of using our platform or purchasing our services.
<b>Mailing List</b>	When you sign up for one of our mailing lists we collect your email address or postal address.	<p>We share information about our services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about our services.</p> <p>If you choose not to provide this information, we will be unable to send you newsletters, but this will not affect your basic functions of using our platform or purchasing our services.</p>
<b>Order Placement</b>	We collect your name, billing address, shipping address, email address, phone number, and credit card number when you place an order.	<p>We use your information to perform our contract to provide you with services.</p> <p>If you choose not to provide this information, we will be unable to complete your travel booking.</p>
<b>Partner Promotion</b>	We collect information that you provide as part of a co-branded promotion with another company.	<p>We have a legitimate interest in fulfilling our promotions.</p> <p>If you choose not to provide this information, we will be unable to fulfill our promotions.</p>
<b>Public Health and Safety</b>	In certain situations where a serious public health threat has been identified, we may collect information from employees, guests, and other individuals booking travel with us. This may include medical and health information, such as body temperature, symptoms, and underlying health conditions. In some cases, we may also collect medical, health, and related information about an employee’s children, family member, or other individuals under the employee’s care.	<p>We have a legitimate interest in protecting the health and safety of our employees and guests. In some jurisdictions we may be required by law, regulation, or governmental order to collect and retain information related to issues of public health and safety. We have a legitimate interest in complying with the laws in the jurisdictions in which we operate.</p> <p>If you choose not to provide this information, we may be unable to assist you in booking flights and accessing other countries.</p>
<b>Surveys</b>	When you participate in a survey, we collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party’s privacy policy applies to the collection, use, and disclosure of your information.	<p>We have a legitimate interest in understanding your opinions and collecting information relevant to our organization.</p> <p>If you choose not to provide this information, we will be unable to implement your feedback and improve our sites, but it will not affect your basic functions of using our platform or purchasing our services.</p>
<b>Sweepstakes or contests</b>	When you participate in a sweepstakes or contest, we collect information about you which includes contact information to notify you if you are selected.	We have a legitimate interest in operating the sweepstakes. In some contexts, we are also required by law to collect information about those that enter into our sweepstakes, and we have a legitimate interest in complying with those laws.

		If you choose not to provide this information, we will be unable to notify you if you are selected or be able to comply with relevant law, but it will not affect your basic functions of using our platform or purchasing our services.
<b>Website interactions</b>	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We have a legitimate interest in understanding how you interact with our website to better improve it, and to understand your preferences and interests in order to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.  If you choose not to provide this information our website may not operate properly which may impact your ability to use our platform.
<b>Web logs</b>	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the internet is used), domain name, click-activity, referring website, and/or a date/time stamp for visitors.	We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.  If you choose not to provide this information you will not be able to access our website.

In other countries, such as China, we base our processing on different lawful bases as prescribed by law. For more information regarding the lawful basis relied upon please contact us as described in the Contact Information section.

Some jurisdictions also require that we identify our purpose for collecting the following types of personal information:

Categories of Sensitive Personal Information We Collect	Purposes for which it is collected	Effect of Not Providing Information
Driver's license, state or government identification card, or passport number.	<ul style="list-style-type: none"> <li>Verify identity</li> <li>Comply with our legal obligations for employment purposes</li> </ul>	If you do not provide us with this information, we may not be able to book your travel or provide you with employment, as applicable.
Medical and health information	<ul style="list-style-type: none"> <li>To ensure you have a safe and comfortable flight</li> </ul>	If you do not provide us with this information, we may not be able to ensure your travel is safe and comfortable.

**How We Use Information.**

In addition to the purposes and uses described above, we use information in the following ways:

- To identify you when you visit our websites.
- To provide services.
- To improve our services and product offerings.
- To streamline the checkout process.

- To conduct analytics.
- To communicate with you, such as to respond to and/or follow-up on your requests, inquiries, issues, or feedback.
- To send marketing and promotional materials including information relating to our services, sales, or promotions, or those of our business partners.
- To detect and protect against malicious, deceptive, fraudulent, or illegal activity, including violation of our policies and terms and conditions, security incidents, and harm to the rights, property, or safety of our company and our users, employees, or others.
- To debug, identify and repair errors that impair existing intended functionality of our website and services.
- To comply with our legal or regulatory obligations, to establish or exercise our rights, and to defend against a legal claim.
- For internal administrative purposes, as well as to manage our relationships.
- For such other purposes as you may consent (from time to time).

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you complete an online purchase, we may collect your information to perform our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your order. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

### **How We Share Information.**

In addition to the specific situations discussed elsewhere in this Privacy Policy, we may disclose personal information in the following situations:

- **Affiliates and Acquisitions.** We may share information with our corporate affiliates (*e.g.*, parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage. Where required by law, we will inform you of the recipient's name and contact information.
- **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to comply with your request for the provision of services by a third-party intermediary.
- **Public.** Some of our websites may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
- **Partner Promotion.** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.
- **Service Providers.** We share your information with service providers. Among other things service providers help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.
- **Other Disclosures with Your Consent.** We may disclose your information to other third parties when we have your consent or direction to do so.

When we disclose your information as described above, we do our best to assess the legality, legitimacy, and necessity of third parties collecting your personal information, and at the same time, require outside entities to process your personal information only as needed to provide services to you, and take necessary security precautions needed to prevent your personal information from being leaked, damaged, lost, tampered with, or otherwise processed improperly.

## **Your Choices**

Some jurisdictions give you a right to make the following choices regarding your personal information:

- **Access To Your Personal Information.** You may request access to your personal information or confirmation that we have information about you. In certain limited circumstances, you may also request to receive access to your data in a portable, machine-readable format.
- **Changes To Your Personal Information.** We rely on you to update and correct your personal information. Most of our websites allow you to modify or delete your account profile. If our website does not permit you to update or correct certain information, you can contact us at the address described below in order to request that your information be modified. You may ask us to correct information that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.
- **Deletion Of Your Personal Information.** You may request that we delete your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another business purposes.
- **Objection to Certain Processing.** You may object to our use or disclosure of your personal information by contacting us at the address described below.
- **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in emails that you receive. If you decide not to receive promotional emails, we may still send you service related communications.
- **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by replying “STOP.”
- **Revocation Of Consent.** Where we process your personal information based upon consent, you may revoke consent. Please note, if you revoke your consent for the processing of personal information then we may no longer be able to provide you services.

Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity.

### *Submitting Requests*

You may exercise the rights described above by contacting us as indicated in the “Contact Information” section below.

Note that, as required by law, we will require you to prove your identity. We may verify your identity by phone call or email. Depending on your request, we will ask for information such as your name, information relating to the last trip you booked through us, or the date of your last communication with us. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct or delete personal information about you in our files.

## **How We Protect and Retain Information**

No method of transmission over the internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

We retain your personal information for only as long as necessary to fulfil the purposes outlined in this Privacy Policy, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, the purposes for which we obtained the information and whether we can achieve those purposes through other means, as well as applicable legal requirements.

## **Transmission Of Information To Other Countries**

When you request a booking for travel arrangements that are located or otherwise due to be fulfilled outside the EEA, we will have to transfer your personal data overseas. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible we take steps to treat personal information using the same privacy principles that apply pursuant to the law of the country in which we first received your information. By submitting your personal information to us you agree to the transfer, storage, and processing of your information in a country other than your country of residence including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction you can contact us using the contact information below. You may also request a copy of any Standard Contractual Clauses we use for the transfer of your data outside of the EEA, which includes the categories of information transferred by contacting us using the contact information below.

## **Third-Party Applications/Websites**

For your convenience, we may provide links to websites and other third-party content or services that we do not own or operate. The websites and third-party content to which we link may have separate privacy notices or policies. Please note, we have no control over the privacy practices websites, or services that we do not own. We encourage you to review the privacy policies of any third-party website or application for details about such third party's privacy practices.

## **Changes To This Privacy Policy**

We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy. Our privacy policy includes an "effective" and "last updated" date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

## **Contact Information**

If you have any questions, comments, or complaints concerning our privacy practices, or if you need to access this Privacy Policy in an alternative format due to having a disability, please contact us at the appropriate address below. We will attempt to respond to your requests and to provide you with additional privacy-related information.

DPO@destinationsport.com  
Destination Sport Limited, c/o IT Compliance  
56 Oxford St.  
Manchester M1 6EU

If you are not satisfied with our response, and are in the European Union or United Kingdom, you may have a right to lodge a complaint with your local supervisory authority.

If you are not satisfied with our response and are in the PRC, you can file a complaint with the Cyberspace Administration of China, the Consumer Protection Association and other regulatory authorities. The complaint methods are as follows:

- (1) Reporting Center of the Cyberspace Administration of China: [www.12377.cn](http://www.12377.cn)
- (2) Telephone for consumer complaints and reports: 12315

Or you can also settle the dispute by filing a lawsuit in the State of Massachusetts.

**Effective Date: June 12<sup>th</sup> 2023**

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