

# PRIVACY POLICY

Doc. Number	SAM.PRV.POL	
Version	V4	
Date	18-May-22	
Approved	Bertie Alexander Lawson (BAL)	

## Version History

Version	Date	Approved	Notes
V1	01-Feb-20	BAL	Initial Version
V2	31-Aug-21	BAL	
V3	22-Dec-21	BAL	Updated doc. number
V4	18-May-22	BAL	



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#### Introduction

Sampan Travel Company Ltd and Sampan Travel Pte Ltd (both hereon referred to as Sampan Travel, Sampan, 'we', 'us', 'our') are part of the Aequitas Group of Companies.

You can view public information of Sampan Travel Ltd and Sampan Travel Pte Ltd listed on the Myanmar Directorate of Investment and Company Administration (DICA) (<a href="https://www.myco.dica.gov.mm/">https://www.myco.dica.gov.mm/</a>) and the Singapore Accounting & Corporate Regulatory Authority (ACRA) (<a href="https://www.acra.gov.sg/who-we-are/">https://www.acra.gov.sg/who-we-are/</a>). You can find out more about us here: <a href="https://www.sampantravel.com/about-us/">www.sampantravel.com/about-us/</a>.

Sampan Travel is located at Level 3, 99 Condo, Dhamazedi Road, Yangon, the Union of the Republic of Myanmar. Sampan Travel can be contacted on +95 (0) 9440 647 312 and hello@sampantravel.com.

Sampan Travel respects the privacy of those who interact with us and is committed to protecting and safeguarding the personal information shared with us. This Privacy Policy outlines how we do that.

This Privacy Policy regularly refers to our website <a href="www.sampantravel.com">www.sampantravel.com</a> (hereon referred to as 'the website'), which is owned, operated, licensed and controlled by Sampan Travel. The website is intended for use by persons who are over 18 years of age.

By visiting the website and engaging with Sampan Travel either via the website or otherwise, you are accepting the practices outlined in this Privacy Policy.

This policy is updated annually and can be accessed via the website and sent in soft copy on request.



## 1. Cookies & website usage

When a visitor browses the website they browse anonymously. No personal information is collected while browsing. Bulk demographic data such as gender, age and interests are collected and used to analyze the website visitors, principally through Google Analytics.

Sampan Travel utilizes "cookies" that enables the website to monitor traffic patterns and so to serve website visitors more efficiently if and when they revisit the website. A cookie does not identify the visitor personally, however it does identify the devise used to access the website through the devices IP address, as well as the internet browser used. IP addresses are not personally linked to identifiable information.

The cookies that the website uses stay in a browser's subfolders until the website visitor deletes them manually or the browser deletes them based on the duration period set by the cookie itself. These cookies enable one to visit the website over and over again and be recognized as a previous visitor. The information stored by the cookies, such as the server the device is logged onto, the browser type, and whether the website was entered from a website or email hyperlink, is recorded and tracked in aggregate. This information is used to measure the response rate to web pages and email hyperlinks.

Sampan Travel principally uses the cookies of Google Analytics. The information generated by these cookies is transmitted to Google for the purpose of compiling statistical reports to enable to us to measure things such as the popularity of pages and time spent on pages.

For further information about Google Analytics please visit <a href="www.google.com/analytics">www.google.com/analytics</a>. You may choose to opt-out of Google Analytics using the Google Analytics Opt-out Browser Add-on which you may access at <a href="https://tools.google.com/dlpage/gaoptout/">https://tools.google.com/dlpage/gaoptout/</a>.



For further information about cookies in general please visit: <u>aboutcookies.org.</u> You can set your browser not to accept cookies in general and the above website tells you how to remove cookies from your browser.

## 2. Newsletters and marketing emails

Sampan uses the software Mailchimp (<a href="https://mailchimp.com/">https://mailchimp.com/</a>) to manage our newsletters and marketing emails. Sampan Travel sends newsletters and marketing emails to those who have subscribed themselves, asked Sampan Travel to subscribe them, or who have travelled on a tour (physical or virtual) with Sampan Travel. It is possible to opt-out of receiving emails from Sampan Travel as described below.

When Sampan Travel sends emails via Mailchimp, we may use the recipient's email address to identify information about the receipt of the email, including whether the communication was opened, how many times it was viewed and whether an embedded hyperlink was clicked upon to reach a particular web page. This information is used to measure response rates to email communications so to enhance our email communications.

Sampan Travel provides all recipients with a means to decline receiving the newsletter and marketing emails. At any time, a recipient is able to request to discontinue receiving emails from Sampan Travel by following the 'Unsubscribe' link at the bottom of each email. Recipients are also able to opt out of receiving emails by contacting us directly at hello@sampantravel.com.



## 3. Travelling with Sampan

When making a **booking** with Sampan Travel, a certain amount of information will be required and then stored. This information may include, but is not limited to: the names, addresses, passport details, special requirements, disability or medical condition and dietary requirements of all those travelling. We may also ask for next of kin and travel insurance details.

When arranging a journey for our **guests**, Sampan Travel will need to pass on some of this information to our partners involved in delivering the journey, principally hotels, airlines and other transport companies. The information may also be provided to security services and public authorities such as customs and immigration if required by them, or as required by law. In most cases, the information passed on will be solely the name and passport number of those traveling. In making a **booking**, **guests** consent to this information being passed on to those responsible for a part of the tour and/or public authorities. We will not pass any information on to any person or body who is neither responsible for part of a **guest's** travel arrangements nor a public authority.

Providing your personal information to us is voluntary. However, we may not be able to fulfill your **booking** and your experience may be affected if you opt not to provide certain personal information. For instance, we can't process your travel **booking** if we don't collect your name and contact details; nor can we book a flight for you without your name and passport number.

After the conclusion of a journey with Sampan Travel, we will email our **guests** requesting feedback on their journey to be submitted via a Microsoft Form. The response to this form is saved, as is any other feedback, complaints, suggestions etc. that we have received from you either verbally or in writing at any time. This is to improve our service to other **guests** and to you if you are to travel with Sampan Travel again in the future.



In this email requesting feedback, we will also ask our **guests** whether they wish for us to keep their passport copies or delete them. If we receive no response, the passport copies will be deleted. The option for us not to delete the passport copy is given for those **guests** that intend to travel with Sampan Travel in the near future and would like us to store their passport copy for ease of future **bookings**.

No other data will be deleted by default. However, other personal information can be deleted as outlined in 6. What are you data protection rights?.

We will never sell your personal data under any circumstances.

## 4. Online payment

**Guests** are able to make payment to Sampan Travel online by use of credit or debit card. If this is a physical tour the invoice and payment page will be generated by Sampan Travel. The payment gateway is powered by Stripe (<a href="https://stripe.com/">https://stripe.com/</a>). Debit/credit card details never pass through or are stored on Sampan's server. Card payment for virtual tours may utilize a different system. Please contact us for more information.

Some **guests** may opt to make online payment via bank transfer. This will either be to our Singapore account with DBS (<a href="https://www.dbs.com.sg/">https://www.dbs.com.sg/</a>) or our Myanmar account with KBZ (<a href="https://www.kbzbank.com/en/">https://www.kbzbank.com/en/</a>). Refunds to **guests** who have made payment via bank transfer will similarly come from these two bank accounts. **Guests**' bank account details can be deleted from our online bank accounts upon request. They will not be deleted by default. The same is the case for mobile wallet transactions.



## 5. Photos and videos on tour

Our **guides** are requested not to take any photographs or videos of our **guests** without their consent. If photos or videos are taken of you without your consent, you are within your rights to request that these be deleted. You are welcome to email Sampan Travel to ensure this happens.

If a **guide** does take a photo or video of you with your consent, they may send this to Sampan Travel. In such a case, Sampan Travel will save these files securely for future reference of your journey with Sampan. Sampan will assume that photos and videos have been taken with consent unless told otherwise. These will never be distributed or made public without your consent and you are always welcome to request that we delete them.

#### 6. What are your data protection rights?

*The right to access* – You have the right to request Sampan Travel for copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Sampan Travel corrects any information you believe is inaccurate. You also have the right to request Sampan Travel to complete information you believe is incomplete.

The right to erasure – You have the right to request that Sampan Travel erases your personal data, under certain conditions.

The right to data portability – You have the right to request that Sampan Travel transfers the data that we have collected to another organization, or directly to you, under certain conditions.



The right of withdrawal – You have the right to withdraw any consent that you have previously given.

If you make a request we have one month to respond to you. If you would like to exercise any of these rights, please contact us at: <a href="mailto:hello@sampantravel.com">hello@sampantravel.com</a>.

#### 7. Final remark

If a **guest** or website user believes that Sampan Travel has not complied with this Privacy Policy or they have other related inquiries or concerns, they may contact us directly at: hello@sampantravel.com.