

## PRIVACY POLICY OF THE WEBSITE IMMERSION-IN-RUSSIA.COM

Immersion in Russia creates unforgettable moments for our customers. Looking after the personal data you share with us is an important part of this. We want you to be confident that your data is safe and secure with us and to understand how we use it to offer you a better and more unique and inspiring experience.

*What Does This Privacy Policy of the Website Immersion-in-Russia.com ("Privacy Policy") Cover?*

The data controller is Immersion in Russia ("we", "us"). We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. Your privacy matters to us, so please do take the time to read our Privacy Policy, which explains:

- What types of personal data we collect and why we collect it.
- When and how we may share personal data with other organisations.
- The choices you have, including how to access and update your personal data.

### *Personal Data We Collect*

When you want to use any of our Services, you may provide us with:

- Your personal details, including, but not limited to your address, email address, phone number, date of birth.

When you browse our Website, we may collect:

- Travel preferences.
- Information about your browsing behaviour on our Website.
- Information about when you click on one of our adverts, including those shown on other organisations' websites.
- Information about the way you access our digital services, including operating system, IP address, online identifiers and browser details.
- Social preferences, interests and activities.

When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our Services, we may collect:

- Your information, passport details, other ID document details.
- Insurance details.
- Relevant medical data and any special, dietary, religious or disability requests.
- Information about your purchases, including what you bought, when and where you bought it, how you paid for it and credit or other payment information.
- Information about your browsing behaviour on our Website.
- Information about when you click on one of our adverts, including those shown on other organisations' websites.
- Information about the way you access our digital services, including operating system, IP address, online identifiers and browser details.
- Social preferences, interests and activities.
- Personal data you provide when you connect with us, including by email, post and phone or through social media, such as your name, username and contact details.
- Details of emails and other digital communications we send to you that you open, including any links in them that you click on.
- Your feedback and contributions to our surveys and questionnaires.

Other sources of personal data:

- We may use personal data from other sources, such as specialist companies that supply information, retail partners and public registers.

- Your insurance company, their agents and medical staff may exchange relevant personal data and special categories of personal data with us in circumstances where we/they need to act on your behalf or in the interest of other customers or in an emergency.

Personal data you provide about other individuals:

- We use personal data about other individuals provided by you, such as those people on your booking. By providing other people's personal data, you must be sure that they agree to this and you are allowed to provide it. You should also ensure that, where appropriate, they understand how their personal data may be used by us. You guarantee us that you have got all necessary permissions from such third parties for the use of their personal data by us.

### *Using Your Personal Data*

We use your personal data in a variety of ways, as explained below.

- *To provide Services you request*  
We need to process your personal data so that we can manage your booking, provide you with the Services you want to buy and help you with any orders and refunds you may ask for.
- *To manage and improve our Services and day-to-day operations*  
We use personal data to manage and improve our Website, customer loyalty or recognition programme(s) and other services. We monitor how our Services are used to help protect your personal data, detect and prevent fraud, other crimes and the misuse of the Services. This helps us to make sure that you can safely use our Services. We may use personal data to respond to and to manage security operations, accidents or other similar incidents, including medical and insurance purposes. We use personal data to carry out market research and internal research and development, and to develop and improve our Services and the way we communicate with you.
- *To personalise your experience*  
We want to ensure that marketing communications relating to our Services are relevant to your interests. To do this, we may use your personal data to better understand your interests so that we can try to predict what other services and information you might be most interested in. This enables us to tailor our communications to make them more relevant and interesting for you. Looking at your browsing behavior helps us to better understand you as a customer and it allows us to provide you with personalised offers and services. We may also measure your responses to marketing communications relating to the Services we offer, which enables us to offer you the services that better meet your needs as a customer. **If you do not want to receive a personalised service from us, you can change your preference over the phone or by writing an email to us at any time. We will update our records as soon as we can.**
- *To make contact and interact with you*  
We want to serve you better as a customer so if you contact us, for example by email, phone or via social media, we may use personal data to provide clarification or assistance to you. We need to process your personal data so that we can manage any promotions and competitions you choose to enter, including those we run with our partners. We may invite you to take part in customer surveys, questionnaires and other market research activities carried out by Immersion in Russia and by other organisations on our behalf. To help us to better understand you as a customer and to be able to provide you with services and marketing communications (including online advertising relevant to your interests), we may combine the personal data we collect when you contact us with personal data collected from our Website and other sources. We do not sell your personal data to third parties.
- *Marketing communications*

From time to time we may send you relevant offers and news about our Services in a number of ways, including by email. We may also send you information about other companies' products and services that we believe may be of interest to you. We will only do this if you previously agreed to receive these marketing communications. When you order from us, we will ask if you would like to receive marketing communications. You can change your marketing preferences over the phone, using the 'unsubscribe' link in our marketing emails or by writing to us an email at any time. Of course, the choice is entirely yours, but if you say you do not want to receive marketing information from us this will prevent you from receiving great offers or promotions that may be of interest to you. You may still receive service-related communications from us. For example, confirming Services you order from us and providing important information about the use of our Services.

- *Market research*

We like to hear your views to help us to improve our Services, so we may contact you for market research purposes. You always have the choice about whether to take part or continue in our market research.

- *Sharing personal data with suppliers and retail partners*

In order to provide Services requested by you we may share personal data with suppliers of your arrangements, including, but not limited to airlines, hotels and transport companies. We may need to share personal data to establish, exercise or defend our legal rights; this includes providing personal data to others for the purposes of preventing fraud and reducing risk. When we share personal data with other organisations, we require them to keep it safe, and they must not use your personal data for their own marketing purposes. We only share the minimum personal data that enable our partners to provide their services to you and us.

- *Sharing personal data with regulatory authorities*

So that you can travel, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your personal data for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. We may share the minimum personal data necessary with other public authorities if the law says we must, or we are legally allowed to do so.

### *Protecting Your Personal Data*

We know how important it is to protect and manage your personal data. We take appropriate security measures to help protect your personal data from accidental loss and from unauthorised access, use, alteration and disclosure. However, the security of your data also depends on you.

### *Data Retention*

We will retain your personal data for only as long as it is necessary for the uses set out in this Privacy Policy and/or to meet legal and regulatory requirements. After this period, we will securely erase personal data. If data is needed after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to anonymise this data.

### *About Cookies and Similar Technologies*

Cookies are small data files that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device. Cookies help us to provide important features and functionality on our Website, and we use them to improve your customer experience. Please see our separate Cookies Policy.

### *Links to Other Websites*

Our Website may contain links to websites operated by other organisations that have their own privacy policies. Please make sure you read all terms and conditions and a privacy policy carefully before providing any personal data on another organisation's website as we do not accept any responsibility or liability for websites of other organisations.

### *Social Media Features*

Our Website may contain social media features such as Facebook, Twitter and/or Instagram that have their own privacy policies. Please make sure you read their terms and conditions and privacy policy carefully before providing any personal data as we do not accept any responsibility or liability for these features.

### *Accessing and Updating Your Personal Data. Complaints*

You have a right to ask for a copy of the personal data we hold about you. You can write to us asking for a copy of personal data we hold about you.

Please include any details to help us identify and locate your personal data. Where we can provide data access, we will do so free of charge except where further copies are requested in which case we may charge a reasonable fee based on administrative costs.

We want to make sure that the personal data we hold about you is accurate and up to date. If any of the details we hold are incorrect, please let us know.

You can also ask for your personal data to be rectified or erased, to object to the processing of your personal data and, where technically feasible, to ask for personal data you provided to be transmitted to another organisation.

We will update or erase your data, unless we have to keep it for legitimate business or legal purposes.

You can also contact us if you have a complaint about how we collect, store or use your personal data.

[Please submit your request or complaint in writing to the Data Protection Officer: contact@immersion-in-russia.com](mailto:contact@immersion-in-russia.com)

Please note that we may ask you to verify your identity before we can act on your request or complaint. We may also ask you for more information to help ensure that you are authorised to make such a request or complaint when you contact us on behalf of someone else.

### *Legal Basis for Processing Personal Data*

We will only collect and use your personal data if at least one of the following conditions applies:

- We have your consent.
- You give us permission to process your personal data when you accept the Terms and Conditions.
- It is necessary to take steps at your request prior to entering into a contract.
- We need to process your personal data so that we can manage your booking, provide you with services you want to buy and help you with any orders and refunds you may ask for.
- It is necessary for us to comply with a legal obligation.
- So that you can travel, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your personal data for immigration, border control, security and anti-terrorism purposes, or any other purposes, which they determine appropriate.
- It is necessary to protect your vital interests or those of another individual.
- It is in the public interest or we have official authority.

- We may use personal data to respond to and to manage security operations, accidents or other similar incidents, including medical and insurance purposes.
- It is in our or a third party's legitimate interests and these are not overridden by your interests or rights.
- We may use your personal data to better understand your interests so that we can try to predict what other services and information you might be most interested in. This enables us to tailor our communications to make them more relevant and interesting for you.
- Where we need to process special categories of personal data, for example, health data for medical reasons, we will only do so if one or more additional conditions apply.

#### *Changes to Our Privacy Policy*

This Privacy Policy replaces all previous versions. We may change it at any time so please check it regularly on our Website for any updates. If the changes are significant, we will provide a prominent notice on our Website including, if we believe it is appropriate, electronic notification of Privacy Policy changes.

#### *Contact Us*

contact@immersion-in-russia.com

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#### *Copyrights*

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