



GREENLAND TRAVEL PRIVACY POLICY

This Privacy Policy is laid down by Greenland Travel (referred to as “Greenland Travel”, “we”, “us” or “our” in this Privacy Policy) and applies to all our customers, suppliers and business partners.

1. About Greenland Travel

Greenland Travel sells holidays and package tours to, from and in Greenland to private customers that wish to experience Greenland and travel in the country, as well as to business and public customers that have travel needs in, from and to Greenland.

With more than 40 employees at our offices in Denmark and Greenland – and a 30-man strong professional team of tour guides – we have no hesitation in calling ourselves experts on Greenland and experts with regard to tours to, from and in Greenland. We all have a Greenlandic back-ground in one way or another – and thus we know what we are talking about.

This assures you of a professional, safe and priceconscious travel service. We can handle all aspects of your tour – from transport to, from and in Greenland to booking of your hotel and planning of your excursions and adventures in Greenland.

As part of our activities as a travel agency, Greenland Travel collects and processes personal data with a view to fulfilment of the objectives that are described in this Privacy Policy. Greenland Travel is the data controller with respect to the processing of personal data for these purposes.

If you have any questions regarding this Privacy Policy or concerning our processing of your personal data, you are welcome to contact us here:

- **Greenland Travel**
Wilders Plads 13A, 1. fl.
DK-1403 Copenhagen K
Denmark
Email: cch@greenland-travel.dk

2. Data security is important to us

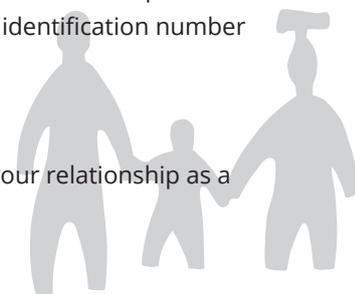
For us, responsible handling of the personal data that is acquired during the course of our business operations is crucial to our business goals and reputation. This Privacy Policy provides an account of how your personal data is collected and utilised when you are a customer, supplier or business partner at Greenland Travel, and how you can get an insight into your own personal data.

3. What is personal data?

Personal data is any information about an identified or identifiable natural person. An identifiable natural person is understood to be a person whom directly or indirectly can be identified, for example by an identification number or one or more elements that are unique to a particular person’s identity.

4. Which type of personal data do we process about you and why?

The information we gather about you will be used for different purposes in connection with your relationship as a



customer and the operation of Greenland Travel's business activities. The information we acquire can vary depending on whether you are a customer, supplier or business partner, but generally speaking will involve information concerning customer administration, supplier administration and information concerning Greenland Travel's rights and obligations.

A failure to provide personal data on your part may mean that Greenland Travel will be unable to meet its obligations in connection with your relationship as a customer or supplier.

As a rule, Greenland Travel only collects and processes general personal data. In certain cases, however, it may be necessary for us to process sensitive personal data (e.g. information concerning special menus on your flight or information concerning special assistance on your tour) to a limited extent, as well as information concerning civil registration (CPR) numbers (e.g. when acquiring a copy of a passport for use in a visa application) in order to be able to provide the tour that meets your wishes.

Greenland Travel will typically acquire the following information:

4.1 Information concerning our customers

Information which you provide to us when booking your tour or creating a travel profile with us, e.g. online via the website or by contacting our offices in Denmark and Greenland, including contact information (first name, middle name(s), last name, address, telephone number, email-address and position, if applicable), civil registration (CPR) number (for use in visa applications, etc.), passport number, bank details, payment card details, information you provide in relation to your particular preferences on the tour (e.g. information concerning special diet, need for special assistance in connection with disability or illness, etc.), health information (for use in therapy tours, sports tours, etc.), information about height, weight, clothes and shoe size (for use when ordering equipment on ski tours, sports tours, etc.), the purpose of the tour, information about which language you speak, citizenship, bonus card numbers, membership of our business partners' associations, contact information of your next of kin, requisitions (in connection with business or therapy tours), information that you provide concerning your preferences in relation to marketing or communication, as well as information that you give us if you contact us with a question in order to report a problem, or when you otherwise contact us in connection with your relationship as a customer.

Greenland Travel can also acquire credit information from credit information agencies to be used to assess your financial solvency and creditworthiness in connection with your relationship as a customer.

4.2 Information concerning our suppliers and business partners

Information that you provide when making a delivery agreement or a cooperation agreement, including contact information (work, job title, first name, middle name(s), last name, address, telephone number and email address), information that you provide concerning your preferences in relation to marketing or communication, as well as information that you give us if you contact us with a question in order to report a problem, or when you otherwise contact us as part of our business relationship.

5. What do we use your personal data for?

Greenland Travel processes your personal data in order to handle the tasks specified below. Note that not all the specified items, categories of data, recipients of data or types of processing of data apply to you in all cases.

Greenland Travel only processes your personal data to the extent that is necessary in connection with your relationship as a customer, supplier or business partner (as in each case any interests are taken into account) or pursuant to applicable legislation.

5.1 Customer administration

Greenland Travel processes your personal data in connection with the creation and continued administration of

your relationship as a customer with Greenland Travel during the course of the operation of our business, including booking of tours and delivery of our other products (such as visa applications, travel insurance, transfer services, etc.), maintenance of our customer registers, [credit ratings], invoicing, debt recovery, marketing, statistics, etc. All statistics and analyses are prepared in anonymised format and therefore do not contain any information that can be directly attributed to you as a person.

5.2 Administration of supplier and business partner relations

Greenland Travel processes your personal data in connection with the administration of supplier and/or business partner relations, where you are the supplier or business partner or are the contact person at a supplier or a business partner with which Greenland Travel works during the course of our business operations, including maintenance of our CRM register with information about contact persons at our respective suppliers and business partners.

5.3 Compliance with applicable legislation and regulations

Greenland Travel processes your personal data in compliance with legislation and regulations to which Greenland Travel is subject during the course of its business operations or in order to fulfil various obligations concerning reporting or disclosure pursuant to applicable legislation and regulations.

Greenland Travel does not use your personal data to make decisions that are solely based on automatic processing, including profiling.

Greenland Travel endeavours to ensure that all personal data that we process is correct and up-to-date at all times. We therefore kindly request that you always inform us of any changes in your personal circumstances (e.g. change of address or payment details), such that we can ensure that your personal data is always correct and up-to-date. If you have created a travel profile with us, please log in to your profile and update it in the event of any changes

6. Legal basis for processing of your personal data

As a rule, Greenland Travel processes the data concerning you on the basis of one of the following: (1) Your consent (GDPR article 6, section 1, schedule a), and article 9, section 2, schedule a); (2) entering into or performance of your contract with Greenland Travel (GDPR article 6, section 1, schedule b); (3) for the purposes of Greenland Travel's legitimate interests, i.e. the purposes that are described above (GDPR article 6, section 1, schedule f); (4) compliance with a legal obligation to which Greenland Travel is subject (GDPR article 6, section 1, schedule c); (5) protection of your or another natural person's vital interests (GDPR article 6, section 1, schedule d, and article 9, section 2, schedule c); (6) processing is necessary for the establishment, exercise or defence of legal claims (GDPR article 9, section 2, schedule f); and/or (7) processing is necessary in order to comply with Greenland Travel's or your employment, health and social security obligations pursuant to national law or EU law (GDPR article 9, section 2, schedule b).

There may also be situations in which we process your personal data for the purposes of a third party's legitimate interests with regard to the purposes that are described above, unless consideration of your interests carries greater weight (GDPR article 6, section 1, schedule f).

7. Disclosure of personal data

Greenland Travel only discloses data to the extent that is necessary in the operation of our business, including being able to deliver your tour and the other products you have purchased from us in connection herewith.

Greenland Travel will typically disclose personal data to the following recipients in connection with the booking of a tour and related products:

7.1 Global Distribution System (GDS)

A GDS is an IT network system that is owned and operated by a firm that enables transactions between the travel industry's service providers, primarily airline companies, hotels, car rental firms and travel agencies.

A GDS connects services, prices and booking by consolidating products across the three travel sectors, i.e. flight reservations, hotel reservations and car rental.

Greenland Travel uses the following GDSs in our business activities: Amadeus

7.2 Airline companies

Greenland Travel discloses personal data to airline companies in connection with booking of your trip. When booking your flight, we will typically disclose information concerning first name, middle name(s), last name, departure airport, destination, dates of outward and homeward journeys, bonus card number, special requests in connection with your flight, including ordering of special menus during the flight and any need for special assistance on the aircraft or in the airport for the chosen airline company.

In connection with flights to special destinations, we can also disclose information about your passport number to the airline company.

When we book your flight, we shall make the reservation in accordance with the rules for reservation of seats that the airline in question has stipulated. This can mean that according to the airline company's rules your flight reservation is classified as a group reservation, although you may not have booked group travel. This can be due to the price of the reservation, special cancellation conditions related to the reservation, etc. If this is the case, the airline company processes the data concerning the passengers that are classified as being part of the same reservation as a group. This means that in certain cases it will be possible for the passengers classified as travelling as part of the same group to access name information of the other passengers in the classification group via use of the airline company's electronic self-service solutions. If you are classified as travelling as part of a group, the other passengers in the classification group in question will in certain cases be able to access information about your name and on whether you are travelling on the flight departure in question through the airline company's electronic self-service solutions.

7.3 Hotels

Greenland Travel discloses personal data to the hotels that you will be staying at on your tour. When booking your hotel accommodation, we will typically disclose information concerning first name, middle name(s), last name, destination, date of arrival and departure, room category, bonus card number, special requests in connection with your trip, including ordering of special food during your stay at the hotel and any need for special assistance during your stay in connection with disability or illness.

7.4 Car rental firms

Greenland Travel discloses personal data to car rental firms if you wish to have a vehicle at your disposal during your trip. When booking your rental vehicle, we will typically disclose information about first name, middle name(s), last name, pick-up point, rental period, vehicle category, bonus card number, special requests in connection with rent of the vehicle, including special provisions in connection with disability or illness, child safety seats, etc.

Greenland Travel uses the following bed banks in our business activities: Europcar, Hertz, Avi and Sixt.

7.5 Bus companies

Greenland Travel discloses personal data to bus companies if you are going on a bus tour as part of your trip (e.g. in connection with day-trips to popular tourist attractions, etc.). When booking your bus tour, we will typically disclose information concerning first name, middle name(s), last name, pick-up point, date and time of the bus tour, destination and special requests in connection with the bus tour, including ordering of special food during your bus tour and any need for special assistance during your stay at a hotel in connection with disability or illness.

7.6 Shipping lines

Greenland Travel discloses personal data to shipping lines if you are going on a sailing trip as part of your trip (e.g. in connection with day-trips to popular tourist attractions, cruises, etc.). When booking your sailing trip, we will

typically disclose information concerning first name, middle name(s), last name, destination, sailing route, dates and times of outward and homeward journeys, as well as special requests in connection with the sailing trip, including ordering of special food during your sailing trip and any need for special assistance during the sailing trip as a result of disability or illness.

7.7 Bedbanks

A bed bank is an IT network system that is owned or operated by a firm that enables transactions between the travel industry's service providers, primarily hotels and travel agencies or the end customer. Greenland Travel discloses personal data to bed banks in order to book the hotels you will be using on your trip. When booking your hotel accommodation through a bed bank, we will typically disclose information concerning first name, middle name(s), last name, destination, date of arrival and departure, room category, bonus card number, special requests in connection with your trip, including ordering of special food during your stay at the hotel and any need for special assistance during your stay at the hotel in connection with disability or illness.

Greenland Travel uses the following bed banks in our business activities: Hotels.com, Booking.com and Totalstay.com

7.8 Travel agents

If, as part of your tour, you will be taking part in excursions or need a transfer, Greenland Travel can disclose your personal data to travel agents. The travel agent's job is to organise the excursion or transfer in question by booking the services required from local suppliers at the destination. When booking your excursions, transfers, etc., we will typically disclose information concerning first name, middle name(s), last name, date and time of arrival and/or departure, type of vehicle, destination, as well as special requests in connection with the transfer or the excursion, including ordering of special food and any need for special assistance due to disability or illness.

7.9 Insurance companies

In connection with your booking, you have the option of purchasing travel and/or cancellation insurance. If you wish to purchase such insurance, we will disclose personal data to the insurance company for use when taking out insurance with the company. When taking out travel insurance and/or cancellation insurance, we will typically disclose information concerning first name, middle name(s), last name, email address, destination, dates of outward and homeward journeys and type of trip

Greenland Travel collaborates with the following insurance companies as part of our activities: Europæiske

7.10 Equipment hire firms

As part of your booking with us, you have the option of hiring any equipment that you might need on your trip, e.g. skiing equipment, diving gear or similar. When hiring equipment, we will typically disclose information to the equipment hire firm concerning first name, middle name(s), last name, type of equipment, pick-up point, rental period, as well as information on height, weight, clothes and shoe size.

7.11 Special conditions concerning qualified quotes

When choosing Greenland Travel, you have the option of receiving a qualified quote for a trip. A qualified quote is a type of quote whereby when the quote is prepared a preliminary reservation is made for you of the trip as requested. This enables you to reserve a seat on the desired departure for up to three days prior to deciding whether a ticket should be issued on the preliminary reservation or whether it should be cancelled.

In order to be able to prepare a qualified quote, we disclose information about you and the reservation requested to a GDS (as described above), which handles the preliminary booking at the airline company, hotel, etc.

As information about your employees is disclosed to several new independent data controllers (GDS, airline companies, hotels, etc.) when procuring the qualified quote, your data may be stored at these recipients once the quote has expired – also in the event that the quote is cancelled.

Greenland Travel can also disclose and/or entrust your personal data to other suppliers and/or service providers in connection with the ordinary operation of our business, e.g. in connection with external administration of our IT systems, analytical tasks, marketing tasks, debt recovery, credit rating, auditing, legal assistance, etc.

For further information about our suppliers' and our business partners' processing and protection of your personal data, please refer to their privacy policies and conditions.

Greenland Travel endeavours to restrict the disclosure of personal data in personally identifiable format to the greatest extent and thus limit the cases where data is disclosed that can be used to identify you personally.

Greenland Travel does not disclose personal data unless it is necessary to perform our business activities or to fulfil your requirements.

8. International transmission of your personal data

Due to the nature of Greenland Travel's activities, your personal data may be transmitted to countries outside the EU/EEA in connection with booking of a tour with us. In order to be able to deliver our services to you, in certain circumstances we have to use business partners and suppliers outside the EU/EEA.

Without the possibility of transmitting your data to recipients outside the EU/EEA, Greenland Travel will be unable to provide the tour that meets your wishes. This will apply if booking of your trip requires that data is transmitted to recipients outside the EU/EEA, e.g. to be able to book flights, hotels, etc., at your travel destination.

Data protection legislation in these countries may not be as strict as it is here in Denmark and the rest of the EU/EEA, as in the majority of cases it will involve countries where the EU Commission has deemed that data protection levels do not live up to the data protection level provided within the EU/EEA.

In cases where it is practically possible for us, the transmission of your personal data will take place on the basis of the standard transmission contracts that the EU Commission has drawn up for this particular purpose. With regard to transmissions to the USA, these will as far as possible take place on the basis of Privacy Shield. Privacy Shield is an agreement between the EU and the USA, which, among other things, stipulates a strong set of data protection rules and security measures with which American businesses that join the scheme must comply when processing personal data.

In certain cases, however, it will not be practical for Greenland Travel to enter into a standard transmission contract or use Privacy Shield as a legal transmission basis. In such cases, the transmission of data will take place on the legal basis of GDPR article 49, 1 (b), since the transmission of your personal data to the country concerned is necessary in order to fulfil the performance of the contract between you and Greenland Travel (booking of your tour) or in order to implement measures that are exercised at your request prior to entering into such a contract (e.g. in connection with issuing a qualified quote as described above in section 7).

It is therefore important that you are aware that the transmission of your personal data to countries outside the EU/EEA in connection with booking a trip at Greenland Travel means that your personal data will not enjoy the same protection as it would under Danish or EU rules.

In connection with transmission of the data there is an attendant risk that in the country concerned there are no clear, precise and accessible rules concerning the national authorities' access to use of your personal data; that there are no rules stipulating that the national authorities' access to your data must be necessary and proportional; that the country does not have an independent and effective supervisory authority; and nor does the country have accessible and effective legal means for those registered.

If in connection with the booking of your tour(s) you do not wish Greenland Travel to send your personal data to recipients outside the EU/EEA, please inform us to this effect no later than when booking your tour.

Greenland Travel does not in any circumstances disclose personal data to recipients outside the EU/EEA unless this is necessary in order to be able to perform our business activities and fulfil your needs by providing you with the tour that meets your wishes.

9. Data integrity and security

Personal information is not stored longer than necessary to fulfil the purpose for which it was gathered, unless storage is required in order to satisfy national legal requirements, including mandatory storage periods in conjunction with accounting, etc

It is Greenland Travel's policy to protect personal data by putting adequate technical and organisational security measures in place. When there is no longer a need for your personal data, we will ensure that it is deleted in a secure manner.

10. Your rights

You have the right at any time to claim your rights in accordance with the data protection legislation applicable at the time. You can request insight into the personal data that Greenland Travel is in possession of and take exception to the processing of the data, including objections against automatic decisions and profiling or against the use of your personal data for direct marketing. Furthermore, you can request correction or deletion of any incorrect information about yourself, retract a declaration of consent for processing of your personal data and claim your right to data portability.

If you wish to claim one or more of your rights, please contact us by email:

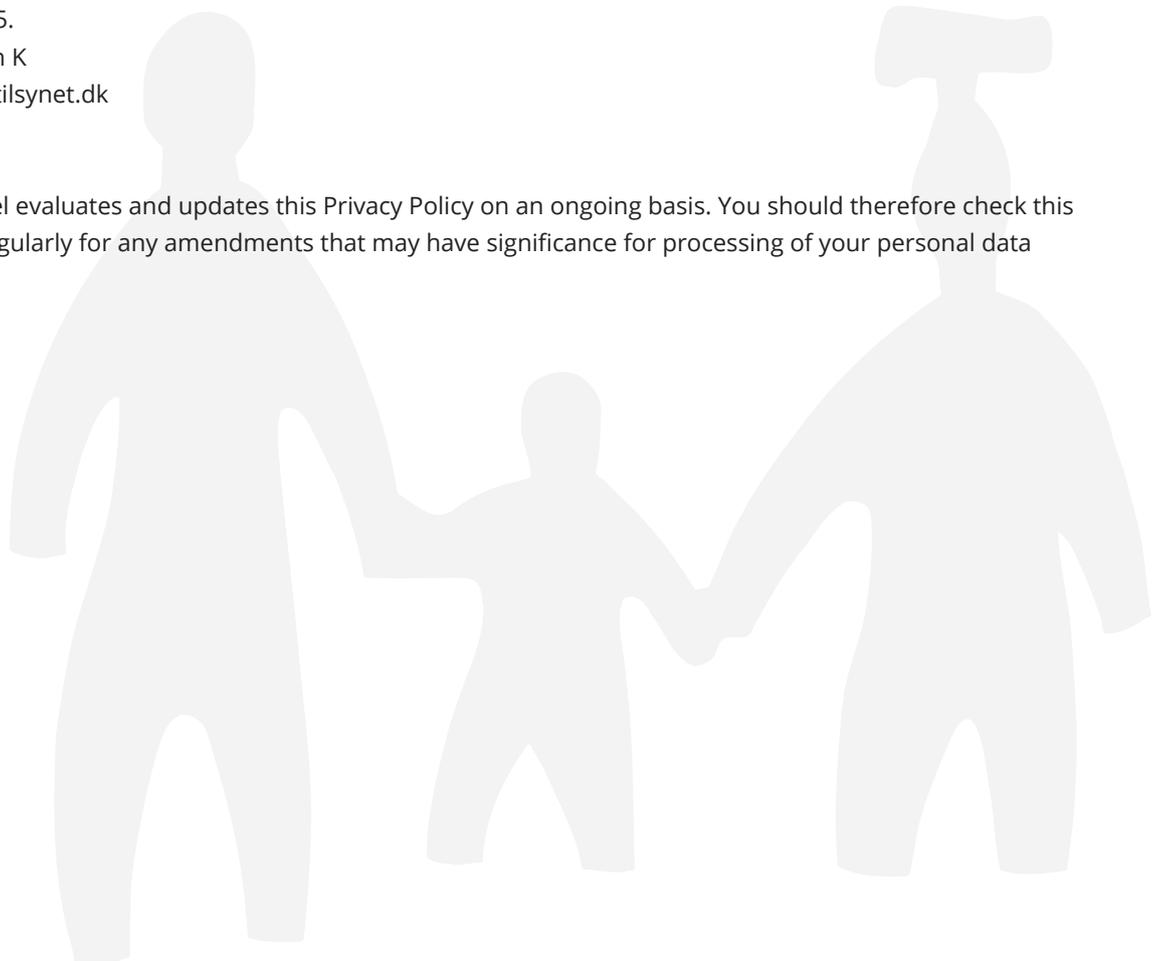
cch@greenland-travel.dk. Your request will be dealt with in accordance with the data protection legislation that is applicable at the time.

Complaints concerning Greenland Travel's processing of your personal data can be addressed to:

- Datatilsynet
Borgergade 28, 5.
1300 København K
E-mail: dt@datatilsynet.dk

11. Updates

Greenland Travel evaluates and updates this Privacy Policy on an ongoing basis. You should therefore check this Privacy Policy regularly for any amendments that may have significance for processing of your personal data





Greenland Travel
Wilders Plads 13A, 1. fl.
DK-1403 Copenhagen K
Denmark

