

## Introduction

Welcome to the Sportive Breaks Privacy Notice.

The purpose of this Notice is to inform you how we look after your personal data when you:

- Visit our website (wherever you visit it from)
- Register interest in the services we offer (and thereby opt in to marketing communications)
- Make a booking with us

It outlines your privacy rights, and the steps we take to ensure they are upheld. If you would prefer to read it offline, you can download a pdf version [here](#).

If there is any terminology used in the Notice that you are unfamiliar with, or you don't fully understand, please refer to the Glossary set out at the end.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how Sportive Breaks collects and processes your personal data, including any data you may provide through this website or via any other means (such as over the telephone) when, for example, you book entry into an event, apply for membership, take part in a competition, complete a survey, register to receive more information or report a problem with our website.

This website is not intended for children, as the events we promote are restricted to adult participants.

It is important that you read this Notice, together with any other privacy or fair processing notices we may provide in specific instances when collecting or processing personal data about you, so you are fully aware of how and why we are using your data.

### Controller

Sportive Breaks acts as a Controller of your personal data (collectively referred to as "Sportive Breaks", "we", "us" or "our" in this Privacy Notice).

As a UK-based organisation Destination Sport Group, of which Sportive Breaks is part, have appointed a data protection officer (DPO) in accordance with the requirements of the UK Data Protection Act. If you have any questions about this Notice, or about data privacy at Sportive Breaks more generally, including any requests to exercise your legal rights, please contact [dpo@destinationsport.com](mailto:dpo@destinationsport.com).

## **Changes to the Privacy Notice and your duty to inform us of changes**

We keep our Privacy Notice under regular review, and this version was last updated on June 23rd 2025. Historic versions can be obtained by contacting us via [dpo@destinationsport.com](mailto:dpo@destinationsport.com).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you provide to us should change during the course of your relationship with us.

## **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy arrangements. When you link to another website and leave ours, we encourage you to read the privacy notice (or equivalent) for that site.

## **2. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about a natural person from which they can be identified. It does not include data where identifying aspects have been removed (referred to as *anonymised* data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

### **(A) Identity**

This includes data relating specifically to your identity, such as your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, passport details, next of kin information, employer details, dietary requirements, loyalty card information (please note this may not be a full list).

### **(B) Contact information**

This includes data signifying how you may be contacted, such as your billing address, delivery address, email address and telephone number(s).

### **(C) Financial data**

This includes data relating to your means and methods of payment, such as your bank account information and/or payment card details.

(D) Transactional data

This includes data relating to the transactions you have carried out with us, such as bookings or membership applications, details about payments from and/or to you, and other details of products and services you have purchased from or via Sportive Breaks.

(E) Technical information

This includes data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website; information about your computer or mobile device including, where available, your IP address, your operating system, your device location, your browser type, and cookie identification numbers.

(F) Profile data

This includes the data we receive when you create a personal profile with us, for example in the process of, or after, booking entry into an event, or when joining the Seven Continents Club. This will include any username(s) you set up, and over time, purchases or orders you make, your interests, preferences, feedback and survey responses.

(G) Usage data

This refers to information about how you use our website, products and services.

(H) Marketing and Communications data

This includes your preferences relating to whether you want to receive marketing information from us and our third parties or not, and your preferred methods of communication.

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, usage may be aggregated to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this Privacy Notice.

## **Special Categories of Personal Data**

Certain types of particularly sensitive personal data may be required in order to fulfil service you request from us. These may include:

- Dietary requirements (from which religious or philosophical association might be inferred)
- Health information

We collect and process the above data only where it is a prerequisite of fulfilling an order you have placed with us, or where you have volunteered it to convey a personal requirement or preference. Furthermore, we will only collect and process this data where you have provided us with your explicit consent to do so.

In certain circumstances failure to provide this information, and/or consent to its use, may prevent us from delivering a service you have requested of us.

## **Consent**

You can withdraw your consent for us to process your data at any time. However if you do so, this may prevent us from being able to deliver a service you have requested and make it necessary to cancel related bookings, which may result in cancellation charges being payable.

## **Failure to provide personal data**

Where we require personal information from you in order to fulfil a booking or registration request you have placed with us, if you do not provide us with the necessary details then we will not be able to fulfil your request.

## **3. HOW YOUR PERSONAL DATA IS COLLECTED**

Data from and about you may be collected via numerous methods, including:

### **(A) Direct interactions**

You may give us your identity, contact and financial data and special categories of personal data by filling in online forms, or corresponding with us by post, phone, email or other channels. This includes personal data you provide when you:

- make a booking;

- query an existing booking;
- subscribe to a newsletter, other publications or alerts;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- provide us feedback;
- offer your services to us as a supplier.

#### (B) Automated technologies or interactions

As you interact with our website, we may automatically collect technical information and usage data about your equipment, browsing actions and patterns.

This data is collected using cookies, server logs and other similar technologies. We may also receive technical information and usage data about you if you visit other websites employing our cookies. Please see our cookie policy for further details.

#### (C) Third parties

We may receive technical information and usage data about you from third-party analytical providers.

### **4. HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we are required to perform a contract we are about to enter, or have already entered, with you;
- To facilitate new bookings of event services on your behalf and at your request;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal or regulatory obligation.

#### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data on the basis of one or more lawful grounds depending on the specific purpose for which we are using it. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| <b>Purpose/Activity</b>                                                                                                                                                      | <b>Type of data</b>                                                                                      | <b>Lawful basis for processing including basis of legitimate interest</b>                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a new user.                                                                                                                                               | (a) Identity;<br>(b) Contact.                                                                            | Performance of a contract with you.                                                                                                                                                                                           |
| To process your bookings of travel services including:(a) Manage payments, fees and charges;<br>(b) Collect and recover money owed to us.                                    | (a) Identity;<br>(b) Contact;<br>(c) Financial;<br>(d) Transaction;<br>(e) Marketing and communications. | (a) Performance of a contract with you;<br>(b) Necessary for our legitimate interests (to recover debts due to us).                                                                                                           |
| To manage our relationship with you which will include:(a) Notifying you about changes to our terms or Privacy Notice;<br>(b) Asking you to leave a review or take a survey. | (a) Identity;<br>(b) Contact;<br>(c) Profile;<br>(d) Marketing and communications.                       | (a) Performance of a contract with you;<br>(b) Necessary to comply with a legal obligation;<br>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services). |

|                                                                                                                                                                          |                                                                                             |                                                                                                                                                                                                                                                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To respond to and/or service an enquiry that you have submitted (all channels).                                                                                          | (a) Identity;<br>(b) Contact;<br>(c) Marketing and communications.                          | (a) Performance of a contract with you;<br>(b) Necessary for our legitimate interests (to expand our customer and supplier bases and respond to enquiries that are raised for our attention).                                                                                               |
| To enable you to partake in a prize draw, competition or complete a survey.                                                                                              | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and communications | (a) Performance of a contract with you;<br>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).                                                                                                            |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data). | (a) Identity<br>(b) Contact<br>(c) Technical                                                | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);<br>(b) Necessary to comply with a legal obligation. |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness                                                                | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and                | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our                                                                                                                                                                      |

|                                                                                                                                                                                                        |                                                                                                              |                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| of the advertising we serve to you                                                                                                                                                                     | communications<br>(f) Technical                                                                              | business and to inform our marketing strategy).                                                                                                                                                              |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences                                                                                     | (a) Technical<br>(b) Usage                                                                                   | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy). |
| To make suggestions and recommendations to you about goods or services that may be of interest to you                                                                                                  | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile<br>(f) Marketing and communications | Necessary for our legitimate interests (to develop our products/services and grow our business).                                                                                                             |
| To monitor our communications with you and check any instructions given to us, for training purposes, for crime prevention, to improve the quality of our customer service and to defend legal claims. | (a) Identity<br>(b) Contact<br>(c) Technical                                                                 | (a) Necessary for our legitimate interests (to assist us in training our employees and defend our business in the event of a claim);<br><br>(b) Necessary to comply with a legal obligation.                 |

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. The following sections provide further explanation as to how we seek to do this.



### ***Promotional offers from us***

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (what we consider 'marketing').

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

### ***Third-party marketing***

We will always get your express opt-in consent before we share your personal data with any third-party company for the purposes of that company sending you marketing material.

### ***Opting out***

You can ask us, or third parties, to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data that you have provided to us as a result of a purchase of services or other such transactions.

### **Monitoring communications**

We may monitor, record, store and use any telephone, email or other communication with you to verify instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If require an explanation of how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. HOW WE DISCLOSE YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out in the table in section 4, above.

(A) Internal Third Parties as set out in the Glossary.

(B) External Third Parties as set out in the Glossary.

(C) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. TRANSFER OF DATA OVERSEAS**

Your data may be transferred to a territory outside of your location in the following instances:

- When you book travel to and/or entry into an event to be held in a territory outside your location, via Sportive Breaks. We will have to transfer your personal data to partner organisations who provide us with the technology we require to process such

bookings, and to the third-party suppliers fulfilling or providing those arrangements, to finalise your booking and enable those suppliers to eventually provide you with the service(s) you have booked.

- Where Sportive Breaks host instances of proprietary and/or third-party provided technology platforms or systems, which we use to process and store your personal information, in a territory outside of your location.

## **7. HOW WE SECURE YOUR DATA**

We have put in place extensive security measures to prevent your personal data from being accidentally used or accessed in an unauthorised way, or otherwise lost, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. HOW LONG WE RETAIN YOUR DATA FOR**

### **How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers, for tax purposes.

In some circumstances you can ask us to delete your data: see **Request erasure** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

You may exercise the following rights in respect of your personal data:

- (A) Request access to your personal data.
- (B) Request correction of your personal data.
- (C) Request erasure of your personal data.
- (D) Object to processing of your personal data.
- (E) Request restriction of processing your personal data.
- (F) Request transfer of your personal data.
- (G) Right to withdraw consent (to process your personal data).

If you wish to exercise any of the rights set out above, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to access it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. GLOSSARY**

### **LAWFUL BASIS/BASES**

- Legitimate Interest

= The interest of our business in conducting and managing our enterprise to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact (both positive and negative) on you and your rights before we process your personal data in service of these interests. We do not use your personal data for activities where our interests are overridden by the impact on you unless we have your consent, or are otherwise required or permitted to by law. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- Performance of Contract

= Processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

- Comply with a legal or regulatory obligation

= Processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

- Internal Third Parties

= Other Portman Travel Group companies acting as joint controllers or processors and who are based in the United Kingdom and provide IT and system administration services and undertake leadership reporting.

- External Third Parties

These may be:

- i. Suppliers of travel and event services, acting as processors, based in the country to which you are travelling / in which you are participating in activities, who fulfil the booking(s) you have made with us.
- ii. Service providers, acting as processors, who act as intermediaries between Sportive Breaks and the suppliers of travel and event services referenced immediately above.
- iii. Service providers, acting as processors, who provide IT and system administration services (see table below).
- iv. Professional advisers, acting as processors or joint controllers, including lawyers, bankers, auditors and insurers, who provide consultancy, banking, legal, insurance and accounting services.
- v. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

***Third-party technology service providers acting as direct processors of personal data:***

| <b>Name</b> | <b>Type of processing</b>                                                      | <b>Processing location(s)</b> |
|-------------|--------------------------------------------------------------------------------|-------------------------------|
| ANS         | Provider of hosting services to Gain Line (see below)                          | UK                            |
| Cvent       | Event management platform                                                      | US                            |
| Campaigner  | Customers communications and marketing system                                  | US                            |
| Gain Line   | Developer-hosts of event booking and customer relationship management platform | UK                            |
| HubSpot     | Customers communications and marketing system                                  | Australia                     |
| Instiller   | Customers communications and marketing system                                  | UK                            |
| Peak15      | Commercial event booking and customer relationship management platform         | US                            |

## **YOUR LEGAL RIGHTS**

### **Request access**

(to the personal data that we hold about you.) Often referred to as a “data subject access request”. This enables you to receive a copy of all the personal data we hold about you, and to check we are processing it lawfully.

### **Request correction**

(of the personal data that we hold about you.) This enables you to have any incomplete or inaccurate data we hold about you corrected – though we may need to verify the accuracy of the new data you provide to us.

### **Request erasure**

(of the personal data we hold about you.) You may ask us to erase any personal data we hold about you if you believe there is no longer a reason for us continuing processing it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), if/where we may have processed your information unlawfully, or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

### **Object to processing**

(of your personal data.) Where we are relying on our legitimate interest (or that of a third party) to process your data, and there is something about your particular situation that makes you want to object to processing on these grounds as you feel it impacts on your fundamental rights and freedoms, then you may object to your data being processed further. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

### **Request restriction of processing**

(of your personal data.) You can ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data’s accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;

(c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

(d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **Request the transfer**

(of your personal data to you or to a third party.) We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

### **Withdraw consent**

(for us to process your data.) Where we are relying on your consent to process your personal data, you can withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.