

# Thinkable Travel<sup>™</sup>

## Privacy Policy for Thinkable Travel

**Last updated:** March 28, 2025

Thinkable Travel AB (Company Registration Number: 5568380215), headquartered at Gräsandsgatan 22, 133 41 Saltsjöbaden, Sweden (hereinafter "Thinkable Travel", "we", "us", "our"), is a Swedish travel operator committed to protecting your personal privacy. Thinkable Travel is a subsidiary of the parent company **Tänkvärt Företag**, which shares the same values concerning data protection, ethics, and sustainability. We are dedicated to safeguarding and respecting your personal data in accordance with the European Parliament and Council Regulation (EU) 2016/679 (General Data Protection Regulation – GDPR), complemented by applicable Swedish national legislation such as the Electronic Communications Act.

This policy applies to all our customers, partners, suppliers, and users of our services and the website thinkabletravel.com.

---

### 1. Data Controller

**Thinkable Travel AB** is the data controller for all processing of your personal data in connection with our services.

**Contact details:**

**Email:** reservation@thinkabletravel.com

**Phone:** +46 70 781 3119

**Address:** Gräsandsgatan 22, 133 41 Saltsjöbaden, Sweden

### 2. What Personal Data We Collect

We collect the following types of personal data:

- Name
- Contact details (address, phone number, email)
- Date of birth
- Payment information
- Booking and travel history
- Technical information from your use of our website (cookies, IP address, browser, etc.)

# Thinkable Travel <sup>II</sup>

## 3. How We Collect Data

We collect data directly from you when booking, using contact forms, newsletter sign-ups, or indirectly through technical tools on our website (cookies and analytics tools).

## 4. Purpose of Processing

Your personal data is processed for the following purposes:

- To manage bookings and trips
- To provide customer service
- To send relevant information about your trip
- For marketing purposes (with your consent)
- To fulfill legal obligations

## 5. Legal Basis

We process personal data based on the following legal grounds:

- Fulfillment of contracts
- Legal obligation
- Legitimate interest
- Consent (for marketing purposes)

## 6. Data Retention

We retain your data as long as necessary for the purposes described in this policy or as required by law. Personal data related to travel bookings is normally stored for 7 years in accordance with accounting legislation.

## 7. Sharing of Data

We only share data with:

- Suppliers and partners necessary to execute your trip
- Payment service providers
- Authorities where required by law
- We never sell your data to third parties.

## 8. International Data Transfers

If data is transferred outside the EU/EEA, it is only to countries with adequate protection levels or through approved safeguards such as standard contractual clauses.

# Thinkable Travel<sup>™</sup>

## 9. Your Rights

You have the right to:

- Request access to your data
- Request correction or deletion
- Restrict processing
- Object to certain processing
- Request data portability
- File a complaint with the Swedish Authority for Privacy Protection (IMY)

## 10. Cookies

We use cookies on our website to improve functionality, analyze traffic, and customize content. You can manage your cookie settings directly in your browser.

## 11. Information Security

We apply both technical and organizational measures to protect your personal data. This includes encryption, access control, staff training, and regular security audits.

## 12. Environmental and Sustainability Policy

Thinkable Travel is committed to responsible travel. We strive for sustainable choices in our supply chain and inform our travelers on how to minimize their climate footprint. This commitment also reflects in our data handling — we operate digitally and minimize unnecessary data storage.

## 13. Thinkable Travel Agreement

Thinkable Travel acts as the designated DMC for this quote and is referred to in this agreement as "Thinkable". The General Terms & Conditions of Thinkable Travel and its affiliated companies apply and are available at: **[thinkabletravel.com](https://thinkabletravel.com)**.

### **General Terms & Conditions**

We comply with GDPR (EU) 2016/679 and supplementary Swedish data protection legislation.

### **Data Processing Addendum**

Both parties accept additional terms for personal data processing.

# Thinkable Travel<sup>™</sup>

## **Cancellation Policy**

- Up to 150 days before the event: 30%
- Up to 120 days before: 60%
- Up to 90 days before: 90%
- From 60 days before: 100% The cancellation fee is based on the date Thinkable receives the written notice.

## **Payment Terms:**

- 25% upon contract signing
- 75% no later than six weeks before arrival

## **Rates and Adjustments:**

Rates are quoted net in the specified currency. Additional services are billed accordingly. Final invoice is adjusted against prior payments. On-site extras are billed at cost + 15% Thinkable fee unless otherwise agreed.

## **14. Application of Swedish Law**

This privacy policy and all personal data processing by Thinkable Travel are governed by Swedish law. We adhere to:

- The General Data Protection Regulation (GDPR)
- Supplementary Swedish legislation such as the Data Protection Act
- Consumer protection under the Distance Contracts Act

In case of a dispute, Swedish law applies and Swedish courts have jurisdiction.

For questions about this policy, please contact us via email: [reservation@thinkabletravel.com](mailto:reservation@thinkabletravel.com)