

Data Protection and Privacy Policy

MAMS Sports Tours

Approved By: Director, MAMS Sports Tours

Review Frequency: Annually

Data Protection and Privacy Policy

1. Policy Statement

MAMS Sports Tours is committed to protecting the privacy, confidentiality, and security of the personal information entrusted to us by students, parents, schools, employees, business partners, and other stakeholders.

As an organisation that arranges domestic and international educational and sports travel, we collect and process personal information to deliver our services safely, efficiently, and in compliance with applicable data protection and privacy laws.

We are committed to ensuring that personal data is processed lawfully, fairly, transparently, and securely.

2. Purpose

The purpose of this policy is to:

- Protect the personal information of all individuals whose data we process.
 - Ensure compliance with applicable data protection and privacy legislation.
 - Promote responsible handling of personal information.
 - Define responsibilities for collecting, using, storing, sharing, and disposing of personal data.
 - Reduce the risk of unauthorised access, loss, or misuse of personal information.
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3. Scope

This policy applies to:

- Directors
- Employees
- Tour Managers
- Coaches
- Volunteers
- Contractors
- Consultants
- Business partners handling personal data on behalf of MAMS Sports Tours

It applies to both physical and electronic records.

4. Personal Information We May Collect

Depending on the services provided, we may collect:

Participant Information

- Full name
 - Date of birth
 - Gender
 - Contact details
 - School information
 - Passport details
 - Visa information
 - Nationality
 - Emergency contacts
 - Parent or guardian information
 - Medical information relevant to travel
 - Dietary requirements
 - Travel insurance information
 - Photographs where consent has been obtained
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Employee Information

- Contact details
- Identification documents

- Employment records
 - Banking information
 - Emergency contacts
 - Qualifications
 - Background verification documents where applicable
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Business Information

- Supplier contact details
 - School contacts
 - Partner organisation details
 - Contract information
 - Payment information
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5. Lawful Use of Personal Information

Personal information is collected only where reasonably necessary to:

- Organise tours and travel arrangements.
- Process registrations.
- Arrange flights, accommodation, transport, and visas.
- Respond to medical emergencies.
- Communicate with participants and schools.
- Meet legal or regulatory obligations.
- Process payments.
- Improve our services.

We do not collect more information than is reasonably required for these purposes.

6. Special Category Information

Certain tours require collection of sensitive information such as:

- Medical conditions
- Allergies
- Disabilities
- Dietary requirements
- Emergency medical information

This information is collected only where necessary to protect participant health and safety and is accessed only by authorised personnel with a legitimate need to know.

7. Data Security

MAMS Sports Tours seeks to protect personal information through appropriate administrative, technical, and physical safeguards, including:

- Password-protected systems and devices.
- Secure storage of paper records.
- Restricted access to personal information.
- Regular software updates and security measures.
- Careful handling of portable devices.
- Secure disposal of confidential records.

Employees are expected to take reasonable precautions to protect personal information from unauthorised access, disclosure, alteration, or loss.

8. Data Sharing

Personal information may be shared only where necessary with trusted organisations involved in delivering our services, including:

- Airlines
- Hotels
- Transport providers
- Visa processing agencies
- Insurance providers
- Sports organisations
- Educational institutions
- Medical professionals during emergencies
- Government authorities where legally required

We seek to share only the minimum information necessary for the intended purpose.

9. International Transfers

As MAMS Sports Tours organises international travel, personal information may need to be transferred to organisations located outside India for purposes such as:

- Flight bookings
- Hotel reservations
- Visa processing
- Tournament registrations
- Educational visits
- Insurance services

Where international transfers are necessary, we seek to ensure that personal information is handled responsibly and only for legitimate business purposes.

10. Data Retention

Personal information will be retained only for as long as reasonably necessary to:

- Deliver our services.
- Meet contractual obligations.
- Comply with legal or regulatory requirements.
- Resolve disputes.
- Maintain business records.

When no longer required, information will be securely destroyed or permanently deleted where practicable.

11. Individual Rights

Where applicable under relevant laws, individuals may request to:

- Access their personal information.
- Correct inaccurate information.
- Request deletion of information where appropriate.
- Withdraw consent where processing is based on consent.
- Raise concerns regarding the handling of their personal data.

Requests will be considered in accordance with applicable legal requirements.

12. Confidentiality

Employees and representatives of MAMS Sports Tours are expected to:

- Keep personal information confidential.
- Access information only when necessary for their role.
- Never disclose confidential information without proper authorisation unless required by law.

Confidentiality obligations continue even after employment or engagement ends.

13. Data Breach Management

Any suspected loss, theft, unauthorised disclosure, or security incident involving personal information must be reported immediately to the Director or designated senior manager.

Where appropriate, MAMS Sports Tours will:

- Investigate the incident.
 - Take steps to contain the breach.
 - Notify affected parties where required by applicable law.
 - Implement corrective measures to reduce future risk.
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14. Employee Responsibilities

All employees must:

- Handle personal information responsibly.
 - Follow this policy and related procedures.
 - Use secure systems and approved communication methods.
 - Report suspected data breaches promptly.
 - Participate in relevant data protection awareness or training.
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15. Supplier Responsibilities

Suppliers and service providers who process personal information on behalf of MAMS Sports Tours are expected to:

- Protect confidential information.
 - Maintain appropriate security measures.
 - Use information only for authorised purposes.
 - Comply with applicable data protection laws.
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16. Monitoring and Review

MAMS Sports Tours will periodically review its data protection practices to:

- Improve information security.
 - Reflect changes in legal requirements.
 - Strengthen privacy protections.
 - Promote continuous improvement.
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17. Governance

The Director of MAMS Sports Tours is responsible for overseeing the implementation of this policy and ensuring that appropriate data protection measures are maintained across the organisation.

18. Review

This policy will be reviewed periodically to ensure it remains effective, reflects changes in legislation and technology, and aligns with recognised data protection best practices.

Data Protection Procedures

To support this policy, MAMS Sports Tours follows these operational procedures:

1. **Collect only necessary information** required for tour planning, bookings, safeguarding, and legal compliance.
2. **Obtain appropriate consent** from participants or parents/guardians for photographs, marketing communications, and the collection of sensitive personal information where required.

3. **Restrict access** to personal data to authorised staff with a legitimate business need.
 4. **Use secure systems** for storing and transmitting participant and employee information.
 5. **Verify identities** before releasing personal information to third parties.
 6. **Share only the minimum necessary data** with airlines, hotels, visa agencies, sports organisations, and other service providers.
 7. **Dispose of records securely** through shredding or secure digital deletion once retention periods have expired.
 8. **Report suspected data breaches immediately** to management for investigation and corrective action.
 9. **Provide periodic staff awareness training** on privacy, confidentiality, phishing, password security, and safe handling of personal information.
 10. **Review this policy and procedures annually** or sooner if legal, operational, or technological changes require updates.
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Data Protection Commitment

MAMS Sports Tours recognises that trust is fundamental to our relationships with students, parents, schools, employees, and partners. We are committed to protecting personal information with care, integrity, and transparency. By implementing robust data protection practices and continuously improving our privacy safeguards, we aim to ensure that personal information remains secure while enabling the safe and efficient delivery of our educational and sports travel programmes.