



OUR COMMITMENT TO YOU

The Shackman Group (TSG) owns and operates the website www.shackmanNY.com. At TSG your privacy is a top priority as we work together to build unique and customized programs and events for your MICE clients coming to New York. We appreciate that you put your trust in us when you provide us with personal information pertaining to your clients and programs, and we do not take this lightly.

This is the reason we have compiled this Privacy Policy which outlines how we collect your information, what kind of information we collect, and how we use that information. By using our website or communicating with us, you are agreeing to the terms of this policy.

We will not compromise your privacy. We design our programs, services and events with your privacy in mind. We involve experts from various fields, including legal, security and IT to make sure that no decision is taken without respect for your privacy.

We work hard to keep your information secure. We constantly review and update our security practices and invest in our security efforts to enhance the safety of your information.

PRIVACY POLICY

We appreciate that you trust us with your information and we intend to keep that trust. This Policy describes our privacy practices in plain language, keeping legal and technical jargon to a minimum.

WHO WE ARE

The Shackman Group (TSG) is a full-service destination and event management company headquartered in New York City in the US.

WHERE THIS PRIVACY POLICY APPLIES

This Privacy Policy applies to information gathered from the website and communications in respect of any services operated by TSG. For simplicity, we refer to all of these as our “services” in this Privacy Policy.



INFORMATION WE COLLECT

Personal Data

We provide customized services to all of our clients. To do this, we collect personal information from you both actively and passively.

We actively collect information in the following ways:

- Through our website inquiry form. This includes information such as your name, e-mail address, phone number, and other pertinent details about your event requirements that you wish us to know.
- When you contact us via email, over the phone, face to face, via social media, and via travel companies who may contact us on your behalf, we will collect your personal information and details about your event requirements. We may also ask you for optional information so we can better serve you.

Please note that if you provide information to us about any person other than yourself, it is your responsibility to ensure that you have been authorized to disclose that information to us and that the persons involved understand how their information will be used.

We may passively collect information from you in the following ways:

- By using Google Analytics, a third-party service that tracks user behavior patterns on our website. This service allows us to passively collect certain kinds of non-personally identifiable information. This might include the type of web browser you use, the date and time of your visit, the amount of time you spend on our website, and the specific pages you visit. We use this data to improve our website function and services.
- Our website may use cookies to collect information. Cookies are small pieces of data that are stored on your device. They help your browser to 'remember' your previous activity on our website and therefore make it more user-friendly.

You may opt out of receiving any, or all, of these communications by emailing us at dmc@shackmanNY.com.

Information You Give Us

You choose to give us certain information when using our services. This includes:

- Providing information relating to the client, individual guests' information including gender and date of birth, credit card information, among other details. Some of the information you choose to provide may be considered "sensitive" in certain jurisdictions. By choosing to provide this information, you consent to our processing of that information.



HOW WE USE INFORMATION

- The primary reason we use your information is to deliver flawless New York programs and events for you and your clients.

In addition, we may use information for various other purposes:

- To provide customer support
- To detect, prevent and address technical issues
- To detect, prevent and fight fraud or other illegal or unauthorized activities
- To provide you with news, special offers and general information about other services and events which we offer that are similar to those that you have already experienced or enquired about unless you have opted not to receive such information
- To ensure legal compliance

To process your information as described above, we rely on the following legal bases:

- *Provide our service to you:* The reason we process your information is to perform the contract that you have with us.
- *Payment processing:* to ensure payments are made as contractually required.

HOW WE SHARE INFORMATION

Since our goal is to provide customized New York experiences and events for you and your clients, selected information would be shared regarding arrival/departure flights, personal information to share with hotels, dietary requirement for events and contact information with key client contacts to ensure a consistent flow of communication.

- ***With our service providers and partners***

We use third parties to help us operate and deliver our programs and events. These third parties assist us with various tasks, including transportation, accommodation, food and beverage and tour activities.

We follow a strict vetting process prior to engaging any service provider or working with any partner. All our service providers and partners must agree to strict confidentiality obligations.

- ***When required by law***

We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.



- ***To enforce legal rights***

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

HOW WE PROTECT YOUR INFORMATION

The security of your data is important to us. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

We work hard to protect you from unauthorized access to or alteration, disclosure or destruction of your personal information. We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, technical and organizational security measures.

HOW LONG WE RETAIN YOUR INFORMATION

We keep your personal information only as long as necessary for legitimate business purposes and as permitted by applicable law.

In practice, we delete or anonymize your information, unless:

- we must keep it to comply with applicable law;
- we must keep it to evidence our compliance with applicable law;
- there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
- the information must be kept for our legitimate business interests, such as fraud prevention and enhancing safety and security.

Keep in mind that even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints.

CHILDREN'S PRIVACY

The collection of personal information from children under the age of 13 years old is done only with parental consent and will only be used to fulfil travel requirements. We do not specifically market to children under the age of 13 years old.



YOUR RIGHTS

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it, and want to request its rectification, deletion or object to its processing, please contact us at dmc@shackmanNY.com.

HOW TO CONTACT US

If you have questions about this Privacy Policy, please email us at: dmc@shackmanNY.com