

# Cavuka

## Privacy Policy

Version 1.0 | Effective date: May 2026

This privacy policy ("Policy") explains how Cavuka ("us", "we", "our") collects, uses, stores and protects the personal data you provide when you visit and use [www.cavuka.com](http://www.cavuka.com) and our booking services (the "Platform"). We reserve the right to update this Policy from time to time. We will notify you of material changes by posting an updated version on this page with a revised effective date. We recommend checking this page periodically.

### What data we collect

Depending on how you use our Platform, we may collect and process the following categories of personal data:

**Browsing and technical data:** your IP address, browser type, device information, pages visited, and behavioural data about how you use the Platform.

**Contact and account data:** your name, email address and any other information you provide when contacting us or registering an account.

**Booking and passenger data:** when you make a flight booking via our Platform, we collect the personal information required to complete that booking. This may include the full names, dates of birth, passport or travel document numbers, nationality, and contact details of all passengers on the booking, as required by the airline or Travel Provider.

**Payment data:** payment card details are collected and processed securely for the purposes of completing your booking. We do not store full card details on our systems.

**Communications data:** records of any correspondence between you and Cavuka, including emails and contact form submissions.

### Why we collect your data and our lawful basis

We process your personal data only where we have a lawful basis to do so under applicable data protection law, including the UK GDPR. The purposes for which we process your data, and the lawful basis for each, are:

**To provide and operate the Platform** (lawful basis: performance of a contract, or steps taken prior to entering a contract).

**To process flight bookings and communicate booking confirmations** (lawful basis: performance of a contract).

**To transmit passenger data to airlines and Travel Providers** as required to fulfil your booking (lawful basis: performance of a contract; legal obligation where required by the airline or applicable regulation).

**To improve our Services and Platform** (lawful basis: legitimate interests).

**To comply with legal obligations** including applicable data protection, tax, and regulatory requirements (lawful basis: legal obligation).

**To send you marketing communications** only where you have given us your explicit consent to do so (lawful basis: consent). You can withdraw consent at any time.

## How we protect your data

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, disclosure, alteration or destruction. These include encrypted transmission of data, access controls, and secure storage practices. While we take reasonable steps to protect your data, no method of transmission over the internet is completely secure and we cannot guarantee absolute security.

## Who we share your data with

We do not sell, lease or distribute your personal data to third parties for their own marketing purposes.

We share your data only as necessary and in the following circumstances:

- With airlines and Travel Providers, to the extent necessary to process and fulfil your booking. The airline or Travel Provider with whom your booking is made will receive the passenger data required for that booking and will process it in accordance with their own privacy policy.
- With payment service providers, for the purposes of processing your payment securely.
- With our technology service providers and data processors who assist us in operating the Platform, under written data processing agreements that restrict their use of your data.
- Where required by law, regulation, or court order, or to protect the rights, property or safety of Cavuka, our users or others.
- In the event of a business transfer, merger or acquisition, your data may be transferred to the successor entity, subject to equivalent privacy protections.

Where we transfer your personal data outside the UK or European Economic Area, we ensure that appropriate safeguards are in place as required by applicable data protection law.

## How long we keep your data

We retain your personal data only for as long as is necessary for the purposes for which it was collected, or as required by law. In general:

- Booking and passenger data is retained for a minimum of six years to comply with our legal and financial record-keeping obligations.
- Account and contact data is retained for as long as your account remains active and for a reasonable period thereafter.
- Marketing data is retained until you withdraw your consent or request deletion.

When data is no longer required, we securely delete or anonymise it.

## Our Cookie Policy

Our Platform uses cookies and similar technologies to improve your experience, analyse usage, and support the functionality of the Platform. When you first visit our Platform, you will be presented with a cookie consent notice. We will only place non-essential cookies with your consent.

Cookies do not allow us to gain access to your device or the information stored on it beyond what you have agreed to share with us. They are used to recognise your browser, store your preferences, and analyse how you interact with our Platform.

You can manage or disable cookies at any time through your browser settings. Please note that disabling certain cookies may affect the functionality of the Platform. For guidance on managing cookies across different browsers, visit [www.internetcookies.com](http://www.internetcookies.com).

## **Links to other websites**

Our Platform may contain links to third-party websites. Cavuka is not responsible for the privacy practices or content of those websites. We recommend that you review the privacy policy of any website you visit via a link from our Platform.

## **Your rights**

Under applicable data protection law, including the UK GDPR, you have the following rights in relation to your personal data:

- Right of access: you may request a copy of the personal data we hold about you.
- Right to rectification: you may ask us to correct inaccurate or incomplete data.
- Right to erasure: you may ask us to delete your data in certain circumstances, for example where it is no longer necessary for the purpose for which it was collected.
- Right to restriction of processing: you may ask us to restrict the processing of your data in certain circumstances.
- Right to data portability: you may request that we provide your data in a structured, commonly used and machine-readable format.
- Right to object: you may object to processing based on our legitimate interests or for direct marketing purposes.
- Right to withdraw consent: where processing is based on your consent, you may withdraw it at any time without affecting the lawfulness of processing before withdrawal.

To exercise any of these rights, please contact us via the contact form on our Platform. We will respond within 30 days. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk) if you believe we have not handled your data in accordance with applicable law.

## **Contact us**

If you have any questions about this Policy or how we handle your personal data, please contact us via the contact form on our Platform at [www.cavuka.com](http://www.cavuka.com).