

# **Travelsmith Investments Ltd.**

## **Privacy Policy**

**Updated 25 May, 2018**

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## **1. About this policy**

This Privacy Policy is to help you understand how we collect, process, share and protect the personal information you provide to us, and your rights regarding this information.

We reserve the right to amend this Privacy Policy at any time by posting the updated Policy here, along with the date by which the update was published. If any material changes are made to the way that we collect process and/or share your personal information, we will notify you prior to the commencement of such changes.

Use of our services are subject to the terms of this Privacy Policy and our Terms and Conditions of booking. If you do not agree to these terms, then please discontinue using our services.

Further information regarding the General Data Protection Regulation (GDPR) can be found via the website for the Information Commissioner's Office (ICO) [www.ico.org.uk](https://www.ico.org.uk).

## **2. Who we are**

Where we use the words "we", "us" and "our" in this document we mean Travelsmith Investments Ltd, a company registered in England and Wales with company number 01722666 and whose registered address is Travelsmith House, 38 High Street, Burnham On Crouch, Essex, CM0 8AA and any of our subsidiaries, which includes:

- Travelsmith Ltd
- Travelsmith Holidays Ltd

If you would like to contact us please do so using the details provided here:  
<https://www.travelsmith.co.uk/contact-us/>

## **3. What we collect**

The information we collect and process about you comes from a variety of sources and is used so that we may meet your needs, provide accommodation and travel, manage our business and other purposes which, if applicable, will be disclosed to you at the time.

The ways in which we collect your information can include the following:

- Information you provide directly to us – for example when you make an enquiry or a booking by phone, online, email or face-to-face.
- Information you provide to third party sources – for example when you make an enquiry or booking through a travel agent (online or high street).

- Information we gather from “cookies” or similar technologies – further information on this can be found in our Cookies Policy - [www.travelsmith.co.uk/cookie-policy-pdf](http://www.travelsmith.co.uk/cookie-policy-pdf)

The personal data we collect may include, but is not limited to:

- Contact details such as your name, address, telephone number(s) and email address;
- Travel details such as the accommodation type, dates, special requests and extras (e.g. meals) which identify individuals;
- Payment details including debit/credit card number, expiry date, security number and cardholder's address;
- Health and dietary requirements – regarded as ‘special personal information’ will at times be processed to protect your vital interests (for example, food allergies), but otherwise only be processed if we have requested your explicit consent, or if it is required by law.

Where you are providing us with information about other people, for example, if you are making a group booking, it is your responsibility to ensure that the person(s) you have provided the personal data about are aware that you have done so, and that they also understand and accept how we use their information (as described in this Privacy Policy).

## 4. Why we process this information

We will only collect and process your personal information as described in this Privacy Policy in accordance with data protection laws. The legal basis we use for processing your information are as follows:

1. Contract – in order for us to provide the services you require, for example, travel, car hire, transfers and accommodation as booked.
2. Consent – To market products and services. Where necessary and applicable, we will only process certain data with your consent.
3. Legitimate Interest (LI) – we only use LI where we have conducted privacy impact assessments. For example we may rely on LI to:
  - a. Improve and tailor the service we offer you – for example your favourite room, preferred table.
  - b. Communicate with you – for example, arrival information and to keep you up to date with local events and weather.

## 5. How we use it

We may use your personal information in the following ways:

1. Trips, reservations and travel details – the majority of the data you provide will be used to process, confirm and fulfil your booking and/or travel with us. This includes the processing of your data by third parties, for example, hotels, transfer and car hire companies.

2. To personalise and improve the service we offer – customer feedback and data is vital for us to ensure that we offer the best service possible.
3. For research – from time to time we may perform some analysis of market trends and customer demographics.
4. To communicate with you, including but not limited to some or all of the following:
  - a. Confirmation of booking and/or travel and check-in/arrival instructions.
  - b. Respond to any requests you make after a reservation has been made with us.
  - c. Send you reminders relating to your reservation.
  - d. Marketing and promotional offers which we think may be of interest to you.
5. Third party requests – to respond and comply with outside requests initiated by you, as well as in response to legal request.

## 6. Security

We have implemented security measures to prevent your personal data from being accidentally lost, processed or accessed in any unauthorised way, altered or disclosed. These measures are both technological and operational and include periodic reviews of the way we collect, process and store both physical and virtual data.

When your personal information is shared with agents and third parties outside of the Travelsmith Investments Ltd group, we will use reasonable measures to prevent the unauthorised use of this data, including, where applicable, contracts and confidentiality agreements.

We may transfer your personal data outside the EAA (European Economic Area) without your prior consent.

Please note, that while we make every appropriate effort to safeguard your personal information, the transmission of data via the internet is not completely secure, and therefore we make no guarantee, express, implied or otherwise that your information will never be accessed, used or released in a manner that is inconsistent with this Privacy Policy. By providing data online, you accept the inherent risks associated and will not hold us liable for any breach of security.

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

## 7. Who we share the data with

We will never sell or process your data with any external, third party agent, company or individual without your prior consent unless for the purposes detailed in section 4 of this Privacy Policy, or below:

1. Service providers like email provider, IT provider, agents and subcontractors, for the purpose of providing any product or service, for which you have either enquired or purchased, where only the necessary data is transferred.

2. If required to do so by any court, financial or other regulatory, compliance, Government or law enforcement agency.
3. In connection with the sale or potential sale of all or part of our business.

Please note that where your personal information is processed by third parties, we put measures in place such as contractual agreements, to keep your information secure. We are not liable for the security of any information you provide direct to third parties.

## 8. Your rights

You have the following rights:

- The right to be informed – we must provide a privacy statement with the emphasis on transparency over how we process your data.
- The right of access – find out what details we may hold about you and why.
- The right to rectification – correcting or updating your details.
- The right to erasure - request to be forgotten.
- The right to restrict processing – the right to ‘block’ or suppress processing of personal data.
- The right to data portability – the right to obtain and reuse your personal data that you have provided to us.
- Rights in relation to automated decision making and profiling – we do not use automatic decision making or processing at present, although we may in the future.

It is your responsibility to ensure that the personal information you have provided to us is accurate and complete. To make any enquiries, amendments to your data, or exercise any of your rights set out in this policy, please contact us via the details provided in section 2.

## 9. How long we keep your information

All personal data is retained for the period necessary to fulfil the original purpose, any other linked purposes, including for the purposes of satisfying any legal, accounting or reporting requirements, and otherwise as necessary to allow us to conduct our business. All personal data we retain is subject to this privacy statement.

Our retention periods can vary based on the varying needs of the business, the criteria used to determine the retention periods include but are not limited to:

1. Contractual – in relation to your information we use to perform any contractual obligation with you, we may retain that data whilst the contract remains in force, plus any period of time required by legal, financial or regulatory bodies.
2. Defence of legal claims – in relation to any information where we reasonably believe it will be necessary to defend or prosecute or make a claim against you, us or a third party, we may retain that data for as long as that claim could be pursued.

3. Marketing – we retain your personal information for a period of two years after your last transaction or interaction. You will always have the opportunity to unsubscribe from any marketing.

If you have a question about a specific retention period for certain types of personal data we process about you, please contact us via the details provided in section 2.

We take all reasonable steps to ensure that any personal information that is no longer needed, is either irreversibly anonymised or destroyed securely. Even if we delete your personal information, it may exist on backup or archival media for legal, tax or regulatory purposes.

## 10. Complaints

You have the right to complain about the processing of your personal information. Please contact us using the details provided above. If you are still unsatisfied you have the right to complain to the Information Commissioners Office. [www.ico.org.uk](http://www.ico.org.uk)