

## **360 Private Travel**

### **Data Protection Privacy Policy**

#### **What is the purpose of this privacy policy?**

This privacy policy is to tell you what personal data we collect from you and why and what we will do with this data. It also tells you about some of the key rights which you have under data protection laws. You and your personal data is protected by the UK General Data Protection Regulation (which is otherwise known as UK GDPR) and the UK Data Protection Act 2018. In this privacy policy, we refer to this legislation as data protection laws.

We will only process your personal data as set out in our privacy policy or otherwise notified to or agreed by you or as we are otherwise permitted to do in accordance with data protection laws.

When we refer to “you” in this privacy policy, we mean the lead passenger, anyone else we communicate with in respect of an enquiry, quote or booking (for example, the person by or through whom payment is made if not the lead passenger), all persons who travel or are intended to travel on holiday and the parent/guardians of any minors who travel or who are intended to travel.

#### **What is our role in relation to your personal data?**

For the purposes of data protection laws, we, 360 Private Travel, are a data controller in respect of the personal data you provide us with.

#### **What is my personal data and what do you mean by process?**

When we refer to personal data, we mean any information which relates to an identified or identifiable individual.

Where we refer to process or processing, we mean anything which we may do with your personal data including collecting, storing, using, disclosing to third parties and erasing it.

#### **What personal data will we collect from you and why?**

In order to respond to an enquiry, provide a quote, administer and fulfil your booking or send you any promotional material, we need to process personal data we obtain from you.

Where you wish to make a booking, the personal data we need to collect and process at various stages is likely to include;

- name of the lead passenger
- contact details for the lead passenger including their e-mail and postal addresses and telephone number(s)
- if different to the lead passenger, the point of contact for financial arrangements / payments including their e-mail and postal addresses and telephone number(s)
- names and dates of birth of all persons travelling
- special dietary information
- information in respect of any medical condition, disability or reduced mobility which may affect anyone travelling – this comes within special categories of personal data (see below)
- passport information

For an enquiry, the personal data we will need to process is likely to include the name and contact details of the person making the enquiry.

For a booking or booking enquiry, we will process your personal data (other than any data which comes within special categories of personal data - see below) on the basis that this is necessary for the performance of your contract with us or to enable us to take steps at your request prior to your entering into a contract with us. We may also need to do so to comply with a legal obligation to which we are subject or in order to protect your vital interests (for example, in an emergency situation).

If you wish to receive any promotional material from us, enter a competition or take part in a survey, we will need your name and the contact details applicable to the form of communication you have consented to. For example, if you wish to receive information by e-mail, we will need your e-mail address.

We do not use any personal information for marketing purposes other than the names and applicable contact details of the person who has consented to receive such material.

Personal data which concerns your health or which reveals your racial or ethnic origin or your sexual orientation are special categories of personal data. Other information also comes within special categories but this is unlikely to be relevant to the booking and provision of travel arrangements.

Generally speaking, the processing of special categories of personal data requires the explicit consent of the person concerned.

Accordingly, information concerning any disability, medical condition, restricted mobility or other health related issue (and related requirements) as well as dietary restrictions which disclose your religious beliefs or any health issue are special categories of personal data. We will ask for your consent to our processing this information at the time you make your booking or your booking enquiry or whenever you otherwise provide or indicate that you intend to provide such information. This consent should be provided to us by the party leader on behalf of the person concerned who must authorise the party leader to do so.

In the case of special categories of personal data which relates to children and young people under the age of 18 when the consent is required, consent will need to be provided by the party leader on behalf of the individual's parent or legal guardian who must authorise the party leader to do so.

### **Who may we provide your personal data to?**

Where you make a booking, appropriate personal data will be passed on to the relevant suppliers of your chosen travel arrangements. If you ask us to book any additional services we will have to pass on your details to the supplier of those services. Suppliers and other third parties are likely to include the following depending on the travel arrangements booked:-

- hotels and other accommodation providers
- airlines and other transport providers
- cruise lines

When you make a booking, you will be prompted to give credit/ debit card or other payment details to a third party payment processor. Whilst it may feel like we are collecting this information, it is actually being collected by the payment processor directly in order to take authorised payments.

The information may also be provided to government / public authorities such as customs or immigration if required by them, or as required by law.

We may also make personal data available to other companies who provide services on our behalf, such as direct marketing, administration, customer care, website hosting and the re-organisation/structuring/sale of our business.

We only provide third parties with the personal data they require in order to deliver their services. Other than in relation to government / public authorities (over whom we have no control), we will take appropriate steps which are intended to ensure that anyone to whom we pass your personal data for any reason agrees to keep it secure, only uses it for the purposes of providing their services and does not collect any personal data from you in the course performing their services.

In the event of our insolvency we, or any appointed insolvency practitioner, may disclose your personal information to the CAA, so that they can assess the status of your booking and advise you on the appropriate course of action under any scheme of financial protection. The CAA's General Privacy Notice is at <https://www.caa.co.uk/Our-work/About-us/General-privacy-notice/>.

### **Where will we process your personal data?**

Your personal data may be processed within the UK and/or any country(ies) of the European Economic Area (EEA). EEA countries are all member states of the European Union together with Norway, Iceland and Liechtenstein.

It is unlikely but we may also process personal data outside UK or the EEA. Data protection laws may not be as strong outside the UK and EEA as they are in the UK and EEA. Personal data will not be transferred to a country outside the UK or the EEA unless (1) the country to which it is transferred is one which the UK government considers to provide an adequate level of data protection or (2) the personal data is transferred to a company which is required by our contract with them only to deal with the data in accordance with our instructions and to maintain appropriate security to protect the personal data which we are satisfied they have or (3) we are obliged to provide the personal data to a government / public authority in order to provide your booking.

### **How do we protect your personal data?**

We take appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data, which is appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures.

### **Can we use your personal data to send you information about other travel services in the future?**

We will only retain and use your personal data for marketing purposes where you have specifically consented to our doing so or, in relation to e-mail marketing, where we comply with the Privacy and Electronic Communications Regulations 2003 (PECR). PECR permits us to send you e-mail marketing where you have previously provided us with your e-mail address in the course of entering into a contract with us for travel arrangements or negotiations for such arrangements and we wish to e-mail you marketing material about our similar services or products. You will of course be given the opportunity to opt out of receiving such e-mail marketing communications when you first provide us with your e-mail address and whenever we send you any e-mail marketing.

You may provide your consent to receiving marketing material from us either on-line or by telephone. You may also choose in what ways you are happy to receive communications from us. You may, for example, be happy to receive information and offers by post and e-mail but not by telephone.

**Can you withdraw your consent to our processing your personal data?**

Yes, you can withdraw your consent to receiving marketing material or other communications from us at any time, either generally or in any particular way, by e-mailing us at [info@360privatetravel.com](mailto:info@360privatetravel.com). Alternatively you can telephone us.

**How can you find out what information we are holding about you?**

You are entitled to ask us (by letter or e-mail) what personal data of yours is being held or processed, for what purpose and to whom it may be or has been disclosed. No fee will be charged for responding to this request unless it is obviously unfounded or excessive or we have previously provided the same information. We promise to respond to your request without delay and in any event within 1 month unless the request is complex or you have made numerous requests in which case we may be able to extend our response time by a further 2 months.

**What should you do if the personal data we are holding is inaccurate, out of date or incomplete?**

If you believe this is the case, please tell us by e-mail as soon as possible. We will rectify the problem within 1 month or within 3 months if the rectification request is complex.

**How long can we retain and process your personal data?**

We will not process your personal data in a form which enables you to be personally identified for any longer than is necessary in order to fulfil the purpose for which it was originally collected or for any other legitimate business purpose.

Where your personal data has been provided for the purpose of the booked travel arrangements or other services you have contracted, we are entitled to retain this data for a reasonable period after those arrangements have been completed. In certain limited circumstances, we may be able to retain it for a longer period.

If you have consented to receiving marketing communications from us, we may continue to use your personal data for this purpose until you withdraw your consent or otherwise for as long as we reasonably consider your consent remains valid and effective.

**Can you ask us to delete your personal data?**

Yes, you can ask us to erase your personal data in certain circumstances, for example where you have withdrawn your consent to further marketing material where the data in question has only been processed for this purpose. However, this is not always the case. Please see the previous paragraph for further information on the period of time we may retain personal data.

**Can this privacy policy be changed?**

Yes, from time to time we may need to make changes to this privacy policy. These may be required as a result of changes in data protection laws or in the guidance issued by regulators such as the Information Commissioner's Office (which is usually referred to as the ICO) or where we make changes to our procedures. The latest version of this privacy policy can be found on our website

### **Does our website use cookies?**

Yes, as is the common practice, our website uses cookies. A 'cookie' is a small data file which our website server stores on your computer in order to collect information about your visit and to remember you when you visit again at a later date. The main purpose of a cookie is to identify users and to personalise their visit by customising web pages for their use. We may also use third parties who will collect data which is not personally identifiable to analyse site visits and carry out other similar activities. In the course of doing so, they may place their own cookies on your computer so that they can collect information about your visit. You may if you wish disable or delete such cookies through your internet browser. However, doing so may mean you will be unable to access our website or parts of it, your experience of our website may be adversely affected and/or you may not receive information which is relevant to your personal interests.

### **What should I do if I have a complaint about the processing of my personal data?**

If you have any complaint about the way in which your personal data has been dealt with, please let us know by e-mail to [info@360privatetravel.com](mailto:info@360privatetravel.com). We will investigate and respond to you as soon as we reasonably can. If you remain dissatisfied, you may complain to the Information Commissioner's Office. For further details, see [www.ico.org.uk](http://www.ico.org.uk)

What are our contact details?

You can contact us here:  
360 Private Travel Limited  
54 High Street  
Sevenoaks  
TN13 1JG

Telephone: +44 207 434 2244

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