

# PRIVACY POLICY

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TRAVELGO SYSTEMS PRIVACY STATEMENT



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## 1. INTRODUCTION

- 1.1 This is the Privacy Notice of TravelGo Systems (company number 10372233) and whose registered office is at Caversham Court 34, Belvedere Road, Flat 2, London, SE19 2HW, United Kingdom.
- 1.2 Where this Privacy Notice refers to "TravelGo Systems", "we", "us" or "our", it is referring to TravelGo Systems. This Privacy Notice sets out how we collect and process your personal data in relation to the brand known as TravelGo Systems and its related websites. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your personal data. Please read this Privacy Notice to understand how we may use your personal data.
- 1.3 This Privacy Notice relates to personal information that identifies "you" meaning a customer or potential customer, individuals who browse our website or individuals outside our organisation with whom we interact. If you are an employee, contractor or otherwise engaged in work for us or applying to work for us, a separate privacy notice applies to you instead.
- 1.4 This Privacy Notice may vary from time to time so please check it regularly. This policy was last updated on Friday, 15 June 2018.

## 2. HOW TO CONTACT US

- 2.1 For the purposes of relevant data protection legislation, we are a controller of your personal data and as a controller we use the personal data we hold about you in accordance with this Privacy Notice.
- 2.2 If you wish to correct your personal data, opt out receiving marketing communications from us, request the complete deletion of your personal data, or wish to contact us in relation to our processing of your personal data, please contact TravelGo Systems.

You have the following rights over your personal data (please note the relevant one in your contact):

- Request Information about data we hold on you, or how we process it (Right to be informed, right of Access)
- Rectify information we have
- Delete your personal data from our records (Right to Erasure)
- Restrict the way we process your data (Right to restrict processing)
- Opt out receiving any further communications from us (right to object)

## 3. TYPES OF PERSONAL DATA WE COLLECT

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The following are the types of personal data we may collect, use, store, share, and transfer where applicable.

- 3.1 **Advertising Data.** This includes personal data which relates to your advertising preferences. For instance, we may collect and store your name and email if you have subscribed to our newsletter and given us your consent to receive news, promotions, offers, and other marketing material;
- 3.2 **Information Technology Data.** This includes personal data which relates to the information technologies you use to find and access our services such as your device type (for example, whether you were using a mobile phone, tablet, or PC to visit our website), IP address, browser type and version, time zone, operating system, and geographic location;
- 3.3 **Individual Data.** This includes personal data which relates to your identity, such as your title, first name, middle name, last name, date and place of birth, passport number, and gender;
- 3.4 **Website Usage Data.** This includes data which relates to your usage of our website, such as information about how you interact with the products, services, and information assets made available to you on our website.
- 3.5 **Economic and Financial Data.** This includes personal data required for us to process your booking in line with our obligations under the Payment Card Industry Data Security Standard (PCI) and for the prevention of fraud;
- 3.6 **Enquiry and Sales Data.** This includes personal data which relates to the transactions you have conducted with us, such as details about payments to and from you, details of subscriptions to our services or publications and other details of products and services you have purchased from us;
- 3.7 **Market Research Data.** This includes data gathered for the purpose of market research, such as holiday type preferences, travel style, and price comparison information.
- 3.8 **Health Data.** This includes personal data gathered for health and safety reasons, including any information you provide about allergies, disabilities, or other medical conditions to assist us during the booking process in tailoring your travel experience around your particular needs.
- 3.9 **Communication Data.** This includes personal data which relates to a method of communication with us such as your billing address, delivery address, email address, and telephone numbers.
- 3.10 **Customer Service Data.** This includes personal data which relates to your experience of our products and services, for example, your reviews of products and services purchased through us, or complaints you might have about our service in which case a record is made of your feedback so steps can be taken to address your concerns.

- 3.11 **Aggregated Data.** This includes statistical or demographic data derived from your personal data but does not directly reveal your identity. For instance, we may calculate the percentage of users visiting each of our products published on our website in order to infer trends or level of popularity of our holiday categories.
- 3.12 **Special Categories of Data.** We may use certain special categories of data in relation to sexuality, religious belief, ethnic origin, politics or health you provide us to offer you tailored experiences. For example, if you disclose to us a special category of data that may or may not apply to you personally in order to request a special interest tour. Further information about our use of Special Categories of Data, and the legal basis we rely on to use it, can be found in section 5.2 of this Privacy Notice.

## 4. WHERE DO WE OBTAIN YOUR PERSONAL DATA

We obtain your personal data from the following sources:

- 4.1 Directly from you, via our website, via email, or by telephone. This include personal data which you provide when:
- 4.1.1 Request a quotation from us
  - 4.1.2 Request a brochure or publication
  - 4.1.3 Use our website Live Chat facility to speak to a Travel Consultant, Representative, or Customer Service Team
  - 4.1.4 Subscribe to our service, newsletter, or publications
  - 4.1.5 Request marketing to be sent to you
  - 4.1.6 Enter a competition or promotion
  - 4.1.7 Complete a survey from us
  - 4.1.8 Send an Email to us
- 4.2 Automated Technologies, such as call recording, website cookies, server logs and similar technologies
- 4.3 Third parties such as:
- 4.3.1 Analytics Providers
  - 4.3.2 Advertising Networks
  - 4.3.3 Search Information Providers
  - 4.3.4 Providers of technical, payment and delivery services
  - 4.3.5 Partnerships
  - 4.3.6 Travel Agents

## 5. HOW WE USE YOUR PERSONAL DATA & OUR BASIS FOR USING IT

### 5.1 Where we are relying on a basis other than consent

We may rely on one or more of the following legal bases when processing your personal data. We have set out below the purposes for which we may process your personal data and the relevant legal basis upon which we will rely (this is what the law allows us to do):

5.1.1 For managing your booking we will use information provided by you to deliver our products and services. This includes booking holidays, tours, transportation, car hire and the issuing of tickets. We will rely on the following legal basis to process this personal data:

- (a) the processing is **necessary for the performance of a contract** to which you are party or in order to take steps at your request prior to entering into a contract;

5.1.2 To make suggestions and recommendations to you about our products and services that may be of interest to you, for determining and measuring the effectiveness of promotional campaigns and advertising and making sure our marketing is relevant to you. We will rely on the following legal basis to process this personal data:

- (a) the processing is **necessary for the purposes of the legitimate interests** pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;

5.1.3 To deal with your enquiries, to send you information you have requested or to provide you with important-real time information about our products and service you have ordered from us (e.g. a change of time or location due to unforeseen circumstances). We will rely on the following legal bases to process this personal data:

- (a) the processing is **necessary for the purposes of the legitimate interests** pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;
- (b) the processing is **necessary for the performance of a contract** to which you are party or in order to take steps at your request prior to entering into a contract;

5.1.4 For the development, delivery and improvement of our products and services, marketing, customer relationships and experiences in the provision of products and services to our customers. We will rely on the following legal basis to process this personal data:

- (a) the processing is **necessary for the purposes of the legitimate interests** pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;

5.1.5 Where you have submitted a job application we may for a reasonable period of time keep your details on file for future reference should a suitable position subsequently become available and we may send you information about job opportunities. We will rely on the following legal basis to process this personal data:

- (a) the processing is **necessary for the purposes of the legitimate interests** pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;

5.1.6 To help us develop our website to be more useful to you and our customers, for identifying usage trends and for internal purposes of research, analysis, testing, monitoring, customer communication, risk management and administrative purposes, to help us define types of customer for our products and services, to keep our website updated and relevant and to develop our marketing strategy. We will rely on the following legal basis to process this personal data:

- (a) the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;

5.1.7 To protect our rights or property (including our website), administer and improve our IT services and network security, prevent fraud and facilitate any business reorganisation or group restructuring exercise. We will rely on the following legal basis to process this personal data:

- (a) the processing is **necessary for the purposes of the legitimate interests** pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;

5.1.8 In order to comply with our own legal obligations, e.g. health and safety legislation, or to assist in an investigation (e.g. from the Police). We will rely on the following legal basis to process this personal data:

- (a) the processing is **necessary for compliance with a legal obligation** to which we are subject;

5.1.9 In order to use your personal data in life or death situations where there is no time to gain your consent (e.g. in the event of an accident and we have to give personal details to medical personnel). We will rely on the following legal basis to process this personal data:

- (a) the processing is **necessary in order to protect the vital interests** of the data subject or of another natural person;

5.1.10 In an official role which we have been designated to carry out by an official authority (e.g. the government), or where we are otherwise carrying out tasks which are in the public interest (e.g. which have been designated as such by the government, or which would otherwise be deemed in the public interest). We will rely on the following legal basis to process this personal data:

- (a) the processing is necessary for the performance of a task carried out in the **public interest or in the exercise of official authority** vested in us.

## 5.2 Special Categories of Data

In addition, we may lawfully process Special Categories of Data in certain ways. We set out below the purposes for which we may process Special Categories of Data along with the legal bases on which we process these Special Categories of Data (this is what the law allows us to do):

5.2.1 we may need to process your health information (for example to enable us to make arrangements for special assistance and any dietary preferences or requirements or for determining your fitness to fly). In relation to the processing of such Special Categories of Data:

- (a) We rely on the following legal basis to process such Special Categories of Data:
  - (i) the processing is **necessary for the performance of a contract** to which you are party or in order to take steps at your request prior to entering into a contract;
  - (ii) the processing is **necessary in order to protect the vital interests** of the data subject or of another natural person;
- (b) Additionally, we can only process such Special Categories of Data where:
  - (i) The processing is necessary in order to protect the **vital interests** of you or another individual where you or the individual is physically or legally **incapable of giving consent**;
  - (ii) The processing is necessary **for reasons of public interest in the area of public health** for example:
    - (a) protecting against serious cross-border threats to health;
    - (b) ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices;

5.2.2 we may need to disclose any Special Categories of Data we hold on you, where to do so is in the substantial public interest (for example your health information in order to prevent an epidemic, in the event of illness or injury or some other related emergency, to record any accident or injury or other incident you may suffer when visiting any of our locations or to arrange for you to receive medical assistance), provided that when we do so we provide suitable measures to protect your rights. In relation to the processing of such Special Categories of Data:

- (a) We rely on the following legal basis to process such Special Categories of Data:
  - (i) The processing is necessary for the **performance of a task carried out in the public interest** or in the exercise of official authority vested in us.
- (b) Additionally, we can only process such Special Categories of Data where:

- (i) The processing is necessary **for reasons of public interest in the area of public health** for example:
  - (a) protecting against serious cross-border threats to health;
  - (b) ensuring high standards of quality and safety of healthcare and of medicinal products or medical devices;

5.2.3 we may need to process information about your religion (for example to enable an airline to provide you with a meal indicating a particular religion e.g. halal or kosher) or your sexuality (for example to enable us to provide you with a specific holiday which you have requested from our range). In relation to the processing of such Special Categories of Data:

- (a) We rely on the following legal basis to process such Special Categories of Data:
  - (i) the processing is **necessary for the performance of a contract** to which you are party or in order to take steps at your request prior to entering into a contract;
  - (b) Additionally, we can only process such Special Categories of Data where:
    - (i) You have given us explicit **consent** to the processing of such Special Categories of Data for the purpose. You may at any time withdraw this specific consent, but we will be unable to fulfil your booking in such event and we may have to cancel your booking.

We will always attempt to minimise the amount of sensitive personal data collected unless there is a specific lawful reason (e.g. an emergency situation).

## 6. WHO MAY GET ACCESS TO YOUR PERSONAL DATA

6.1 We may disclose your personal data to:

6.1.1 our third-party suppliers or sub-contractors who may process data on our behalf to enable us to provide you with our services. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;

6.1.2 our group companies and affiliates or third-party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;

6.1.3 HMRC, legal and other regulators or authorities, including those who request your personal data or to report any potential or actual breach of applicable law or regulation;

6.1.4 external professional advisers such as accountants, bankers, insurances, auditors and lawyers;

6.1.5 law enforcement agencies, courts, immigration authorities, customs and excise authorities or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;

6.1.6 third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;

6.1.7 third parties which are considering or have decided to buy some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation);

6.1.8 third parties operating plugins or content (such as Facebook, Twitter, Instagram) on our website which you choose to interact with;

## 7. PERSONAL DATA ABOUT OTHER PEOPLE YOU PROVIDE TO US

In some cases, personal data about each passenger identified within the same booking is provided by a single person, the lead passenger. The lead passenger is the person appointed by your party to coordinate travel arrangements with us, make payments, receive communications from us, and liaise with our teams throughout the booking process.

7.1 If you provide personal data to us about someone else you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Notice.

7.2 You must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, the way in which we collect and use personal data and our personal data disclosure practices, that individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided.

## 8. ACCURACY OF YOUR PERSONAL INFORMATION

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us either by logging onto your account on the website or by contacting us. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

## 9. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Data we collect from you may be transferred to our suppliers in Cuba. These include hotels and B&Bs, car-hire companies, and local excursion providers as is necessary for the conclusion or performance of the

contract concluded in your interests between us (in other words, in order for us to provide you with the holiday you have requested).

## 10. HOW LONG WE WILL STORE YOUR PERSONAL DATA FOR

We ensure that we only keep your personal data for the minimum period as is necessary for us to abide by our relevant legal obligations and we will act in accordance with any group data retention policy mandated by our parent company which is place from time to time.

In relation to personal data relating to your bookings with us, we will store your personal data for 5 years from your departure date.

In relation to personal data relating to marketing, we will store your personal data for 5 years from your last interaction with us. We keep the length of time that we hold your personal data under review. These reviews take place annually.