

# Privacy Policy

## Your privacy is important to us

This statement explains how we collect, use, transfer and store your personal data. We would encourage you to read this information.

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## IMPORTANT INFORMATION AND WHO WE ARE

### About this privacy notice

This privacy notice explains how Julie Kenyon, Personal Travel Agent collects and processes your personal information. We would encourage you to read this information.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about

you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Who's responsible for your personal information?**

We refer to Julie Kenyon in this statement. Julie Kenyon, Personal Travel Agent operates as a sole trader. Julie Kenyon is responsible for this website and is the 'data controller' for your data (collectively referred to as Julie Kenyon, Personal Travel Agent", "we", "us" or "our" in this privacy notice).

### **How can you contact us?**

We have appointed a data protection manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Manager at [julie.kenyon@thepersonaltravelagents.co.uk](mailto:julie.kenyon@thepersonaltravelagents.co.uk) or by writing to: Data Protection Manager, c/o Personal Travel Agents Support Team, Your Co-op Travel, First Floor, 2d Wulfrun Square, Wolverhampton, West Midlands, WV1 3HF..

You can also contact us using the contact details on our website.

If you do not think that we have processed your data in accordance with this notice you should let us know as soon as possible. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **Changes to the privacy notice and your duty to inform us of changes**

We may change this privacy notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

### **Links to other websites**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. When you leave our website, we encourage you to read the privacy notice of every website you visit as we do not control those.

## **THE KIND OF INFORMATION WE COLLECT ABOUT YOU**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you (and about any other person you include on your booking) which we have grouped together as follows:

**Identity Data** includes your name, title, date of birth, gender and passport details.

**Contact Data** includes your address, email address and telephone numbers.

**Sensitive Data** includes information concerning medical conditions, disabilities, religious or philosophical beliefs and criminal convictions and offences.

**Financial Data** includes bank account and payment card details.

**Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, survey and promotional responses.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Apart from the Sensitive Data referred to above, we do not collect any other **Special Categories of Personal Data** about you (this also includes details about your race, sex life, sexual orientation, political opinions, trade union membership and information about your genetic and biometric data).

#### **Information about other people**

You are responsible for ensuring that the other members of your travel party are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data to us to make a booking or other purchase on their behalf.

#### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products and services). We will notify you if this is the case at the time.

### **HOW YOUR PERSONAL INFORMATION IS COLLECTED**

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact, Financial, Sensitive and Transaction Data by filling in forms or by corresponding with us online or by post, phone, email or otherwise. This includes personal data you provide when you:

- apply to purchase our products and services;
- enquire about our goods and services;
- subscribe to our services or publications;
- request marketing to be sent to you;
- enquire about our community involvement;
- enter a competition, promotion or survey; or
- give us some feedback.

**Automated technologies or interactions.** As you interact with our website, we may automatically collect Profile and Usage Data. We will also collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Please see our [cookie policy](#) for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:

Identity, Contact and Sensitive Data from schools or other organisations making a party booking on your behalf and carers or other healthcare providers in relation to your booking.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

Identity and Contact Data from data brokers or aggregators.

Identity and Contact Data from publicly available sources such as social media.

Technical Data from the following parties:

analytics providers;

advertising networks; and

search information providers.

## HOW WE USE YOUR PERSONAL INFORMATION

It's important that you understand what we'll do with the data that we hold about you.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you.

Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to the collection and use of Sensitive Data and sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### Purposes for which we will use your personal information

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To carry out our obligations arising in connection with any contracts entered into between you and us, or between you and a third party supplier, including:  (a) To communicate with you regarding your booking or other purchase (b) Manage payments, fees and charge (c) Collect and recover money owed to us (d) Resolve complaints and deal with disputes	(a) Identity (b) Contact (c) Sensitive (d) Financial (e) Transaction (f) Marketing and Communications	(a) Performance of a contract with you, including the use of data relating to criminal convictions and offences which may be required for VISA requirements or, for example, to secure car hire  (b) Compliance with a legal obligation, including compliance with anti-money laundering legislation relating to foreign currency transactions  (c) Necessary for our legitimate interests (to recover debts due to us)  (d) The provision of preventative medicine and health care in relation to data relating to your health,  (e) Consent in relation to the processing of Sensitive Data such as your religious or philosophical beliefs
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you

<p>(a) Notifying you about changes to our service, terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Recording telephone conversations</p>	<p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated, to study how customers use our products/services and for colleague training and customer service)</p>
<p>To enable you to subscribe for our newsletter, take part in a prize draw, promotion or competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p> <p>(f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion.

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any internal or external third parties for marketing purposes.

### **Opting out**

We won't use your personal data for marketing purposes at all if you've told us not to. You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact me at [julie.kenyon@thepersonaltravelagents.co.uk](mailto:julie.kenyon@thepersonaltravelagents.co.uk)

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **SHARING YOUR PERSONAL INFORMATION**

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Management Service Partners such as Co-op Travel Services and Central England Co-operative Group who provide administrative services and undertake management reporting.

External third parties including the following:

- Travel companies, airlines, hotels, insurers and other organisations involved in performing your contract.
- Industry regulatory bodies such as the Civil Aviation Authority and ABTA.
- Government bodies or other organisations in the UK and in other countries, such as those responsible for immigration, border control, security and anti-terrorism.
- Organisations that provide foreign exchange services in respect of travel money sales.
- Organisations to which we may outsource certain of our activities, such as printing, mailing and distribution services.
- Organisations that provide customer identity and address verification services.
- Organisations doing research for us.
- Organisations for the detection, investigation and prevention of crime, such as the National Crime Agency in respect of money laundering.
- Financial organisations for purposes such as payment processing, finance plans and refunds.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International transfers**

It may be necessary to pass your booking details to third parties, such as airlines, hotels and transfer providers, situated outside of the European Economic Area (**EEA**) in order to perform our contract with you. Whenever we do so, we will try to make sure that your personal information is adequately protected.

### **KEEPING YOUR INFORMATION SECURE**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. For example, all information you provide to us is stored on our secure servers which means that your information can't be read by anyone who doesn't need to see it. Any payment transactions will be encrypted using SSL technology. When you get in touch with us, we'll ask you a couple of security questions before we share any personal details just to check it's you. In addition, we limit access to your personal data to those colleagues, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping that password confidential. We ask you not to share a password with anyone.

We strongly recommend that you do not disclose your account log in details to anyone. Please always remember to logout of your account when you have finished using our website.

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

### **DATA RETENTION**

#### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting me at [julie.kenyon@thepersonaltravelagents.co.uk](mailto:julie.kenyon@thepersonaltravelagents.co.uk).

### **YOUR RIGHTS**

Under certain circumstances, by law you have the right to:

**Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

**Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

**Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

**Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

**Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Manager.

#### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

#### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

#### **Complaints to the regulator**

If you do not think that we have processed your data in accordance with this notice you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact them by going to their website at ico.org.uk, phoning them on 0303 123 1113 or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.