

## TRAVEL COUNSELLORS LIMITED PRIVACY POLICY

Here at Travel Counsellors, looking after the personal data that you share with us is extremely important both to your Travel Counsellor and the wider business. We would like to share with you how we use your data to make your experience with your Travel Counsellor truly personal to you and, also to explain how we secure your personal data.

### **About this Privacy Policy**

This Privacy Policy, which may be updated from time to time, sets out the types of personal data that we collect and explains how and why we use your personal data. It explains when and why we share personal data within the Travel Counsellors Group and with other organisations, and we also set out your rights when it comes to your personal data.

This Privacy Policy applies to you if use our products and services or interact with us, both directly via any of our websites, including our online payment portal (“our Websites”), our mobile application (“our Mobile App”), our social media accounts (“our Social Accounts”) or our Travel Counsellors.

If you are the lead enquirer or booker, you are responsible for ensuring that the other members of your travelling 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.

### **Personal Data we may collect**

Travel Counsellors Limited is the Data Controller for the purposes of the Data Protection Act 1998 and the General Data Protection Regulation.

When you register for our Services on our Websites, for example signing up for marketing emails or requesting to be contacted by a Travel Counsellor, you may provide us with:

- Your personal details, including your postal and billing addresses, email addresses, phone numbers and date of birth and name

When you enquire with a Travel Counsellor for a holiday or business travel booking, you may provide us with:

- Your personal details, including your postal and billing addresses, email addresses, phone numbers and date of birth and name.
- Your personal travel preferences.
- Information about your previous purchases, if you have booked with Travel Counsellors before.
- In some cases, we may also need to collect more sensitive personal data such as information concerning medical conditions, disabilities and special requirements, so as to be able to consider your particular needs in relation to a booking.
- Depending on your method of communication, we may keep a recording of your email or telephone call

When you place a booking with a Travel Counsellor, either as lead passenger, booker, passenger or non-travelling payee, you may provide us or our Service Provider with:

- Your personal details, including your postal and billing addresses, email addresses, phone numbers and date of birth and name
- Financial transaction information, including your debit or credit card information

- Travel related information such as passport details, ethnicity, visa eligibility.
- In some cases, we may also need to collect more sensitive personal data such as information concerning medical conditions, disabilities and special requirements, so as to be able to consider your particular needs in relation to a booking.

When you contact us, or we contact you to take part in any promotions, competitions, surveys or questionnaires about our services, we may collect:

- Personal data you provide about yourself anytime you contact us about our services (for example, your name and contact details), including by phone, email or post or when you speak with us through social media
- Details of the emails and other digital communications we send to you that you open, including any links in them that you click on
- Your feedback and contributions to customer surveys and questionnaires
- Any digital assets, such as images, videos, or emails you provide to us as part of those promotions

We may also use personal data from other sources such as specialist companies that supply information, online media channels, our supplier partners and public registers. For example, this other personal data helps us to:

- review and improve the accuracy of the data we hold; and
- improve and measure the effectiveness of our marketing communications, including online advertising.

When you call your Travel Counsellor on their landline, your call may be recorded. If you call our Head Office, your call will be recorded.

When you interact with us via our Social Accounts, we may collect:

- Social media content such as imagery, video content and feedback such as reviews and social interactions.
- For any content you submit, we may use, copy, modify, adapt, publish or incorporate such content into forms of marketing messaging and advertising for our social accounts, email marketing, print brochures, direct mail, and our website.
- We may also request personal data such as contact details and location in order to process enquiries through to our Travel Counsellors. This data will not be used for any other purpose.

We may also use personal data from social media sources such as Facebook advertising that supply information, cookie and third party data. For example, this type of personal social media data helps us to:

- Contribute to reviewing and improving the messaging and marketing we share on our social accounts such as analytical and reporting data.
- Improve and measure the delivery and effectiveness of our marketing communications across social media advertising.

When you use our website we use data tracking software ('cookies') which allow us to collect:

- Information about your online browsing behaviour on our Websites and Mobile Apps and information about when you click on one of our adverts (including those shown on other organisations' websites)
- Information about any devices you have used to access our Services (including the make, model and operating system, IP address, browser type and mobile device identifiers)

## **How We Use Personal Data**

We use personal data to effectively manage and improve the services we offer to you, including:

- Processing bookings, so that we can manage the provision of services and help with any bookings or refunds you may ask for;
- Improve our online services, including improving our Websites and our Mobile app (see [Cookies & Technology section](#));
- Detection and prevention of fraud or other crimes, so that we can ensure you can safely use our services;
- Improvement and development of our products and suppliers, information technology systems and the way we communicate with you, including measuring the responses to certain products;
- Providing a specialised and personalised service to you to help us meet your needs as a customer, including providing you with marketing material that is relevant to your interests. This may include us measuring your responses to marketing communications;
- Contact and interaction with you, for example by phone, email or post or by responding to social media posts that you send to us, so that we can service your booking or query effectively as a customer

## **Sharing Personal Data**

We may share the personal data we collect with other companies in the Travel Counsellors Group, where it is necessary for the effective servicing of a booking or query.

We may share the personal data we collect with other Supplier Partners and Service Providers. We only share personal data that enable our Supplier Partners to provide their services. We work with carefully selected Service Providers that carry out certain functions on our behalf, including for example, companies that help us with our technology services, storing and combining data, and processing payments. We only share personal data that enable our Service Providers to effectively provide their services.

When we share personal data with these companies we require them store and process it securely, and they must not use your personal data for their own marketing purposes.

We may also need to share personal data with other organisations in certain circumstances:

- if the law or a public authority says we must share the personal data;
- if we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk);
- to an organisation we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organisation receiving your personal data can use your personal data in the same way as us; or

- to any other successors in title to our business.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by companies operating outside the EEA who work for us or for one of our Service Providers, such as airlines, hoteliers, insurance companies and ground handling agents so they can provide you the arrangements you require.

In order for you to travel overseas, we may be required to disclose certain of your personal data to government bodies or other authorities in the UK and in other countries, such as those responsible for immigration, border control, security and anti-terrorism. Even if it is not mandatory for us to provide information to such authorities, we may exercise our discretion to assist them where appropriate.

### **Protection of Personal Data**

The protection and safe-guarding of your personal data is very important to us and we implement various security safeguards to protect your data, including:

- Encryption, such as the use of Transport Layer Security (TLS) where personal data is transferred over the internet.
- Regular reviews of our processes for collecting, storing and processing your personal data.
- Restricting access to your personal data to authorised users. This includes the use of physical security measures.

However, whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us.

### **Marketing**

We will send you relevant news and offers about our products and services in a number of ways, including by email and occasionally, personally by phone direct from your elected Travel Counsellor, but only if you have previously agreed to receive these marketing communications or have engaged with us in a service provision way. When you register with us on our Websites or Mobile app, we will ask you if you would like to receive marketing communications. When you engage with a Travel Counsellor, they will also ask you if you would like to receive marketing communications. You can change your marketing choices over the phone with your Travel Counsellor or in writing to us at Head Office at any time.

We may also wish to contact you about your views to help us improve our products and services, so we may contact you for market research purposes. You can choose not to take part in our market research.

### **Cookies and Technology**

Whilst the focus of the provision of our products and services is via personal communications from Travel Counsellors direct to you, we support this relationship digitally via our Websites and Mobile app.

On our Websites and on our Mobile App, we use cookies and similar technologies, such as tags and pixels (“Cookies”), to personalise and improve your customer experience as you use our Websites and Mobile App.

Cookies are small data files stored locally on your technology device that allow a website to collect and store a range of data on your desktop computer, laptop or mobile device. Cookies help us to provide important features and functionality on our Websites and Mobile App, and we use them to improve your customer experience. For example, we use Cookies to improve the way our Websites and Mobile App work and their performance so that we can personalise your experience and allow you to use many of their useful features.

We also use Cookies to measure the effectiveness of our marketing communications, for example by telling us if you have opened a marketing email that we have sent you.

You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other device.

### **Your Rights**

Under the Data Protection Act 1998 and the General Data Protection Regulation (**GDPR**), you have the right to see the personal data we hold about you. This is called a Subject Access Request. If you would like a copy of the personal data we hold about you, or would simply like to ask any questions about how we collect, store and use personal data, please write to:

Customer Relations  
Venus Building  
No 1 Old Park Lane  
Trafford City  
Manchester  
M41 7HA

You can also email us at [DPO@travelcounsellors.com](mailto:DPO@travelcounsellors.com)

If you would like to exercise your rights under the GDPR, such as the right to be forgotten on our systems or if you would like to withdraw your consent to be marketed and/or communicated with, you may do so via a specific request to your Travel Counsellors and/or contact us directly on [DPO@travelcounsellors.com](mailto:DPO@travelcounsellors.com).

This Privacy Policy was last updated on 3 May 2018.