



*A better business travel service*

## T.E.B. Travel LTD

This policy applies on and from 25 May 2018

### Keeping your data safe

At T.E.B. Travel we are committed to keeping your personal data safe and secure, and handling it in accordance with our legal obligations. This Privacy Policy sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else we think it's important for you to know.

### Who are we?

We are a privately-owned travel agency this means that when you ask us to book travel and or associated services or products we ask you to share some of your personal data with us and we collect information about you so that we can personalise your travel arrangements and share them with third parties such as airlines within the travel industry which relate directly to your needs / requests. *Please note T.E.B. Travel does not sell, share or pass on your details to any other third parties unless you expressly ask us in writing to do so.*

#### 1 Who is in control of your data?

1.1 It is important that you understand who is responsible for keeping your data safe. We are the "controller" of all personal data collected and used for the purposes of providing T.E.B. Travel customers services requested and for any other purposes set out in this Privacy Policy. This means that we are responsible for deciding how and why your data is used and for ensuring that your data is handled legally and safely.

1.2 We have appointed a Data Protection Officer (DPO) who has ultimate responsibility within T.E.B. Travel for making sure your data is treated in accordance with this Privacy Policy and the law. Our DPO Bill Rego can be contacted by emailing bill@tebtravel.com

#### 2 What data do we collect and where from?

2.1 We collect some data directly from you when you request services from us. This data includes the following:

- 2.1.1 your full name;
- 2.1.2 your email address;
- 2.1.3 your date of birth;
- 2.1.4 your gender;
- 2.1.5 your postcode and address;

2.2 We also collect information that you voluntarily provide to us when you contact us with queries, complaints, comments or praise, or information that you voluntarily ask us to store (Voluntary Data) an example of this could be passport details or airline club memberships to speed up booking your requirements and save you time and inconvenience.

2.3 We also collect anonymised publicly available information from social networking sites such as Facebook and Twitter, for example likes, shares, tweets and posts about T.E.B. Travel. This information is provided to us by a third party and is fully anonymised so we cannot see who has posted the information. This information is used for internal analysis purposes.

### 3 What do we use your data for?

3.1 It is important that you understand how and why we use the personal data that we collect about you. This section sets out the different purposes for which we process personal data and which types of personal data we need for each purpose.

3.2 We use your Account Data to contact you occasionally with messages about products and services you have requested, for example to provide you information about a travel booking you have made.

3.3 We use your Voluntary Data to enable us to respond to queries, complaints or comments that you have and to make sure that these are appropriately dealt with, for example when you contact us with a query or complaint. If Voluntary Data you provide includes any special categories of personal data (such as information about your health, race or religion), you must make sure before you provide this that you are happy for us to use that Voluntary Data for the purposes set out in this Privacy Policy.

#### Archiving

3.4 We periodically review the data that we keep in our archive and we will delete or anonymise your data held in the archive where we consider it is no longer of value or interest.

#### 3.5 How we use anonymised data

3.5.1 We use aggregated and anonymised data for certain purposes, such as to help us understand how we improve our service and products for our clients. When used for these purposes, this data does not enable you or any other individual user to be identified.

### 4 How do we use your data for marketing and advertising purposes?

4.1 We do not use or pass on your details for marketing and advertising purposes.

### 5 What is our legal basis for using your data?

5.1 Data protection law says that we have to tell you the legal basis that we rely on to process your personal data for the purposes that we have notified to you. This section tells you what that legal basis is in relation to each of the purposes set out above.

5.2 We process your personal data for all of the purposes identified under **What do we use your data for?** and **How do we use your data for marketing and advertising purposes?** above on the basis that it is in our legitimate interests, or the legitimate interests of third parties with whom we share your data, to carry out these activities. Further information about what those interests are is set out below.

**Purpose: Booking your travel, managing your account and providing you with our services**

**Legitimate interests:** To ensure that all customers enjoy the best service levels possible, to help us deliver our remit as a travel agency.

**Purpose: Improving our services**

**Legitimate interests:** To make sure that we continue to improve our service and provide our clients with the best and most efficient service possible.

5.3 You have the right to object to us processing your personal data for the purposes set out above. Unless we can show that we have a compelling legitimate reason to continue processing your personal data, we will stop processing it. Remember that you can delete your account at any time in which case we will fully anonymise your personal data.

5.4 In respect of the use of your email address for email contact purposes, we process this on the basis that we have your consent to do so. You can withdraw your consent at any time by emailing our DPO [bill@tebtravel.com](mailto:bill@tebtravel.com)

## **6 Freedom of information**

6.1 We are required under the Freedom of Information Act 2000 to provide certain information in response to Freedom of Information requests. You can make a request by emailing [bill@tebtravel.com](mailto:bill@tebtravel.com). In order to respond to requests, we will need to collect your name, address, email address, phone number and information about your request, including any additional personal data you choose to share with us when you make your request. We will use this personal data to respond to your request and will retain it for administrative purposes in line with the section headed **How long do we keep your data for?** below.

6.2 For more information about Freedom of Information visit [www.ico.org.uk](http://www.ico.org.uk)

## **7 Who do we share your data with?**

7.1 We do need to share your personal data with some third parties in some circumstances. This includes where we use third party suppliers to perform various services for us. The third-party suppliers we share your personal data with are as follows:

7.1.1 third party service providers who supply travel related products

7.1.2 third party service providers who provide passport and visa services

7.1.3 third party service providers who process payment details

7.2 We will also share your personal data with third parties in the following circumstances:

7.2.1 where you have specifically consented to us sharing your data with a particular third party.

7.2.2 where we are required or permitted to do so by law or to protect or enforce our rights or the rights of any third party.

7.2.3 Except when traveling outside the (EEA), we do not transfer or store your personal data outside the European Economic Area (EEA). If we do carry out any further transfers of your data outside the EEA, we will inform you and we will ensure that the recipient provides an adequate level of protection of your personal data.

## **8 How long do we keep your data for?**

8.1 We will keep all your personal data for two years.

8.2 We may need to keep your data after account closure for limited purposes, for example if we need your data in order to respond to any complaints or claims that you make. If this is the case, we will only keep the data for as long as we need to in order to fulfil those purposes.

8.3 Any Voluntary Data you submit to our Viewer Enquiries team will be retained for a period of 2 years or up to ten years (in the case of passport information) from submission, after which it is destroyed.

## **9 What rights do you have?**

9.1 You have a number of rights under data protection law. These rights and how you can exercise them are set out in this section. We will normally need to ask you for proof of your identity before we can respond to a request to exercise any of the rights in this section and we may need to ask you for more information, for example to help us to locate the personal data that your request relates to.

9.2 We will respond to any requests to exercise your rights as soon as we can and in any event within one month of receiving your request and any necessary proof of identity or further information. If your request is particularly difficult or complex, or if you have made a large volume of requests, we may take up to three months to respond. If this is the case we will let you know as soon as we can and explain why we need to take longer to respond.

### **9.3 A right to access your information**

9.3.1 You have a right to ask us to send you a copy of your Account Data and all other personal data that we hold about you (subject to some exceptions). A request to exercise this right is called a "subject access request" and must be made in writing to: bill@tebtravel.com or to: Data Protection Officer, T.E.B. Travel LTD 25, Euston Road, London NW1 2SD.

### **9.4 A right to object to us processing your information**

9.4.1 You have a right to object to us processing any personal data that we process where we are relying on legitimate interests as the legal basis of our processing. This includes all of your personal data that we process for all of the purposes set out in this Privacy Policy, with the exception of our use of your email address to send your account / booking communications with your consent (but you can withdraw your consent to this at any time).

9.4.2 If we have compelling legitimate grounds to carry on processing your personal data, we will be able to continue to do so. Otherwise, we will cease processing your personal data.

9.4.3 You can exercise this right by emailing bill@tebtravel.com.

### **9.5 A right to have inaccurate data corrected**

9.5.1 You have a right to ask us to correct inaccurate data that we hold about you. If we are satisfied that the new data you have provided is accurate, we will correct your personal data as soon as possible.

### **9.6. A right to have your data erased**

9.6.1 You have a right to ask us to delete your personal data in certain circumstances, for example if we have processed your data unlawfully or if we no longer need the data for the purposes set out in this Privacy Policy.

9.6.2 We will fully anonymise any personal data we hold about you when you close your account, as set out under **How long do we keep your data for?** above. This means that it will no longer identify you and ceases to be "personal data".

9.6.3 If you ask us to delete your personal data and you are happy for your account to be closed, we will close your account and fully anonymise your personal data as set out above. If you ask us to delete your personal data but you do not want your account closed, we may not be able or obliged to comply with this as we will usually need to keep processing your data in a personally identifiable form to keep your account open.

9.6.4 If you would like to make a request to exercise this right, please contact bill@tebtravel.com. If we are required by law to comply with your request, we will fully anonymise your data so that it is no longer personal data and cannot be used to identify you.

### **9.7 A right to have processing of your data restricted**

9.7.1 You can ask us to restrict processing of your personal data in some circumstances, for example if you think the personal data is inaccurate and we need to verify its accuracy, or if we no longer need the data but you require us to keep it so that you can exercise your own legal rights.

9.7.2 Restricting your personal data means that we only store your personal data and don't carry out any further processing on it unless you consent or we need to process the data to exercise a legal claim or to protect a third party or the public.

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

10.1 If you have any questions or concerns about this Privacy Policy and/or our processing of your personal data, you can get in touch with our Data Protection Officer using: bill@tebtravel.com

### **11 What if you have a complaint?**

11.1 You have a right to complain to the Information Commissioner's Officer (ICO), which regulates data protection compliance in the UK, if you are unhappy with how we have processed your personal data.

11.2 You can find out how to do this by visit [www.ico.org.uk](http://www.ico.org.uk)

### **12 What if this policy changes?**

12.1 We may make changes to this Privacy Policy from time to time. Any changes we make will be notified to you by email if significant changes are made.



## **What is this privacy policy for?**

T.E.B. Travel Ltd is committed to protecting your personal information, being transparent about what data we hold and giving you control over how we use it.

The purpose of this privacy policy is to give you a clear explanation about how we use personal information we collect from you.

## **We are clear on what data we hold and what we do with it.**

In collecting and using your personal information, we will be clear about what we are doing and make sure that you understand the way in which we are using it. Also, we won't sell your personal information to anyone but we may share your information with third parties as set out in this Privacy Policy.

## **You control the data we hold on you.**

### **Compliance with laws and your rights**

There are various laws and regulations which apply to data protection and data privacy including the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003 and 2011 (as may be updated or amended from time to time). Broadly, the laws require that:

- i. you agree to your data being collected and used;
- ii. no more information than is required is asked of you;
- iii. your personal information must be securely kept to prevent unauthorised access;
- iv. you have a right to know what information an organisation holds about you;
- v. your personal information must be deleted when it is no longer required;
- vi. information about your internet use must be protected even where the information being collected is not personally identifiable.

We make sure we stick to these data protection and e-privacy laws. As mentioned above, information about the laws, and your rights, can be found at [www.ico.org.uk](http://www.ico.org.uk)

### **Security Measures**

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Unfortunately, the sending of information via the internet is not completely secure. Although we will do our utmost to protect your information, we cannot guarantee the security of your data sent via the internet; any sending of information is therefore at your own risk.