

# HIGHLAND EXPLORER TOURS

## Privacy Policy

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### Contents

Please click on a link below to jump to a specific paragraph:

1. ABOUT THIS POLICY .....	1
2. OUR COMMITMENT.....	1
3. OUR LEGAL BASES FOR PROCESSING.....	2
4. CHANGE OF PURPOSE .....	3
WE WILL ONLY USE YOUR PERSONAL INFORMATION FOR THE PURPOSE FOR WHICH WE OBTAINED IT. IF WE REASONABLY NEED TO RE-PURPOSE YOUR PERSONAL DATA, WE WILL ENSURE IT IS FOR A REASON THAT IS COMPATIBLE WITH THE ORIGINAL PURPOSE. IF YOU REQUIRE AN EXPLANATION AS TO HOW THE PROCESSING FOR THE NEW PURPOSE IS COMPATIBLE WITH THE ORIGINAL PURPOSE, PLEASE CONTACT US. WE MAY PROCESS YOUR PERSONAL DATA FOR UNRELATED PURPOSES, BASED ON OUR LEGITIMATE INTEREST. ....	3
5. WHO OUR PRIVACY POLICY COVERS .....	3
6. WHAT TYPES OF PERSONAL DATA WE MAY PROCESS .....	4
7. HOW WE COLLECT OR GENERATE YOUR PERSONAL DATA .....	7
8. WHAT DO WE USE YOUR PERSONAL DATA FOR? .....	8
9. PERIOD FOR RETAINING YOUR DATA .....	10
10. USE OF YOUR PERSONAL DATA FOR DIRECT MARKETING .....	10
11. DISCLOSURE OF YOUR PERSONAL DATA TO THIRD PARTIES .....	11
12. HOW THIRD PARTIES WILL HANDLE YOUR PERSONAL DATA.....	12
13. LOCATION OF YOUR PERSONAL DATA .....	13
14. KEEPING YOUR DATA SECURE .....	13
15. YOUR RIGHTS.....	13
16. CONTACTING US .....	13
17. ABOUT US.....	16
18. COPYRIGHT NOTICE .....	16

### 1. About this policy

This document (our “privacy policy”) sets out information into how we use personal information relating to people we interact with including, for example, customers and website users. It serves as an expression of our commitment to protecting your personal data. It is important that you read this privacy policy together with any other privacy notices we may provide you on all occasions of personal data collection and processing, so you are fully aware of how and why we are using your data.

This privacy notice supplements other notices and is not intended to override them.

### 2. Our commitment

We respect your right to privacy, and we aim to ensure you have a trustworthy experience

with us, including when using our websites or shops and booking with or through us. We understand that you care about how your personal data is used by us, and we want to share with you the policies and practices we've adopted. This way you can feel confident about how we handle your personal data.

### 3. Our legal bases for processing

We will process your personal data in accordance with all applicable laws and applicable contractual obligations. More specifically, we will not process personal data unless at least one of the following requirements are met:

- You have given consent to the processing of your personal data for one or more specific purposes;
- The processing is necessary for the performance of a contract to which you are party (for instance, for booking you have made) or in order to take steps at your request prior to entering into a contract (for instance, when you request a quote from us);
- Processing is necessary for compliance with a legal obligation to which we are subject (for instance, for visa applications);
- Processing is necessary in order to protect your vital interests or of any other individual (for instance, if you have any issue during a trip);
- Processing is necessary for the purposes of the legitimate interests pursued by us or by a third party (for instance, protecting our customers, our employees and other individuals and maintaining their safety, health and welfare; promoting, marketing and advertising our products and services; understanding our customers' behaviour, activities, preferences, and needs; improving existing products and services and developing new products and services; preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies; handling customer contacts, queries, complaints or disputes; managing insurance claims by customers; protecting us, our employees and customers, by taking appropriate legal action against parties who have committed criminal acts or are in breach of legal obligations to us; effectively handling any legal claims or regulatory enforcement actions taken against us; fulfilling our duties to our customers, colleagues, shareholders and other stakeholders). Please find below an indicative, non-exhaustive list of processing activities for which we may rely on legitimate interest:

<b>PROCESSING ACTIVITY</b>	<b>BASIS FOR LEGITIMATE INTEREST</b>
Direct marketing activities including tracking, profiling, segmentation, and communication across multiple channels, see section 8.8	Legitimate interest in promoting relevant services and products based on your relationship and interaction with us
Record keeping and reporting, see section 8.6	Legitimate interest in understanding and improving our business
Statistical analysis of customer data, see section 8.7 & 8.9	Legitimate interest in understanding and responding to customer behaviour and preferences
Provision of customer data to insurance providers, border authorities & other law enforcement agencies, see section 11.4 & 11.7	Legitimate interest in protecting and maintaining the safety of our guests and employees; legitimate interest in taking appropriate legal action in case of disputes
Processing of guest preferences and other information volunteered by the guest prior to a trip, see section 8.3	Legitimate interest in personalizing and improving the delivery of our services and products
Processing of customer data as part of prize draws, competitions, sweepstakes, and surveys, see section 6.4 & 6.5	Legitimate interest in engaging with our customers and promoting our products

Processing of customer data in the course of administration and maintenance of our websites and systems, see section 6.8 & 8.7	Legitimate interest in running our business and improving our systems
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## 4. Change of Purpose

We will only use your personal information for the purpose for which we obtained it. If we reasonably need to re-purpose your personal data, we will ensure it is for a reason that is compatible with the original purpose. If you require an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. We may process your personal data for unrelated purposes, based on our legitimate Interest.

- There are some circumstances in which personal data may be processed for purposes that go beyond the original purpose for which the personal data was collected. When this is susceptible to be the case, we will make our best efforts to tell you in advance and request your consent when appropriate.
- For circumstances where we may have other secondary purposes, for processing already existing data which you have provided as part of a contract for example, booking information. The objective of further processing may include conducting marketing insights and data analysis to have a better understanding of our customers.
- We will adopt an aggregate data model that allows us to derive aggregated data from your personal information. Aggregated data is not considered personal data by law, as you will not be directly or indirectly identified. For example we may make use of aggregated data to see performance statistics of our travel consortia/consultants and to gain insights into customer demographics for improving marketing and customer service.
- However, if we combine or connect aggregated data with your personal data so that it directly or indirectly identifies you, we shall treat the combined data as personal data which will be processed with strict guidelines of the GDPR.
- We will not repurpose sensitive or special category data without a lawful basis for doing so and where we rely on Legitimate Interest; will ensure we conduct legitimate interest assessments (see section 3) and data protection impact assessments DPIA, prior to carrying out the proposed processing activity.

## 5. Who our privacy policy covers

### 5.1 Our customers

Our privacy policy sets out how we process personal data relating to individuals who are:

- booking or enquiring about booking travel services with or through us; or
- the recipients of any travel services booked with or through us (e.g. you are the passenger for a booking or booking enquiry made by someone else for you); or
- customers or potential customers or recipients of travel services that can be booked with or through us.

We understand personal data as any information relating to an identified or identifiable individual, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, services obtained or considered, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

### 5.2 Examples of who this policy covers

We include in this privacy policy personal data we process relating to:

(1) individuals who are making any enquiry or booking with us or through us, and individuals in respect of whom any enquiry or booking is made (such as friends, family members, tour group members, officers and employees of businesses and organisations

booking with or through us);

(2) individuals in respect of whom any enquiry or booking is made with us by an agent;

(3) where our customer is a business or organisation, employees or individuals who are acting as representatives of that business or other organisation, and individuals connected to that business or other organisation, such as owners, partners, shareholders, and directors;

(4) individuals whose personal data is obtained from other companies in our group (such as where you have consented to your personal data being disclosed to other group companies for marketing purposes).

### 5.3 When we are data processor only

Please however note that this privacy policy does not apply where we are processing personal data strictly as a sub-contractor or data processor on behalf of a third party, and not on our own account. In this case, you should look to that third party and its privacy policy, who will be answerable for how we process that personal data on their instructions.

### 5.4 Terms used in this policy

When we refer to "**you**" and "**your**" in this privacy policy, we refer to you, and any such individual whose personal data we process from time to time.

When we refer to "**processing**" of your personal data, this includes obtaining, recording, storing or holding your personal data, and anything we do with it, such as organising, adapting or altering it, retrieving, consulting or using it, disclosing it or otherwise making it available to others, combining it with other data, and blocking, erasing or destroying it.

When we refer to "**travel services**" this covers all products and services which may be booked with or through us, such as bespoke holidays, package holidays, accommodation, tours, transport and transfers (whether by air, coach, bus, train, ferry, taxi or other means), car hire, cruises, and charters, and it includes both:

(1) all such products and services which we supply or operate ourselves (including where we sub-contract); and

(2) any such products and services provide by a third party which we book for you (acting as agent for you or that third party). Travel services also includes any services we or a third party provide in association with travel, such as obtaining visas, foreign exchange, and providing local representatives and support.

## 6. What types of personal data we may process

This section summarises the types of personal data about you that we process:

### 6.1 Data concerning you as an individual

We may collect the following:

- name,
- age,
- gender,
- address,
- telephone,
- mobile,
- fax,
- e-mail,
- Social networking contact details, your social posts about any of our trips and travel experiences.
- photographs,
- proofs of identity and address, copies of passports, driving licences, and utility bills,
- card and other payment details, and financial information,

- health information relevant to your planned travel and travel insurances held,
- results of searches carried out against you (such as to verify your identity, address, and credit status),
- your preferences,
- Frequent flyer or travel partner programme affiliation and member number.

You will be free to withdraw your consent to this at any time, by contacting us as detailed in this privacy policy or as detailed in any direct marketing that you receive. In any e-mail you send we would ask you to insert "unsubscribe" as the subject heading.

## **6.2 Business Related Information**

If you are an individual associated with a business or other organisation that is our customer, then your personal data may include the following information that we link to you:

- business or organisation details (such as name, address, telephone numbers, payment arrangements, financial information, etc.),
- your relationship with that business or organisation (such as owner, partner, director, shareholder, employee, or agent), and
- your contact details within that business (such as work address, work telephone and mobile numbers, work fax number, and work e-mail address).

## **6.3 Enquiry and Booking information**

Information concerning enquiries and bookings made with or through us for travel services, including where you are making the enquiry or booking or are the recipient of the travel services to which the enquiry or booking relates. This information may include:

- records of enquiries and searches for holiday and travel products made by or on your behalf,
- details of your personal interests,
- needs and other data relevant to your enquiry;
- details of results, quotes, proposals, estimates and other information given in response to enquiries;
- details of the holiday, accommodation, travel, car hire, and other travel services booked or enquired about;
- details of the passengers / holidaymakers travelling;
- details of the provider of the travel services (e.g. tour operator);
- dates and times of travel;
- price;
- payment details (including card details);
- passport information and visa information;
- foreign exchange requirements and arrangements; and
- Sensitive information such as health, medical, dietary, mobility, disability, or other requirements relevant to the service you are enquiring about or your contract with us.

## **6.4 Survey Information**

Information collected or generated out of any surveys we conduct.

## **6.5 Competition Information**

Information collected or generated out of any competitions or promotions we run.

## **6.6 Account, Registration and Loyalty Information**

Information concerning any accounts, registrations, or memberships with us, or participation in any loyalty program.

## 6.7 Correspondence

Correspondence, communications and messages, including between you and us, and between us and third parties, relating to any booking or booking enquiry, or performance of any contract.

## 6.8 Website Usage Information

We may collect information about your visits to, browsing of, and use of our website, unless your web browser blocks this. The range of data we collect will depend on how you interact with our website.

This information may include:

- your IP address (a unique identifier allocated to your computer for your connection to the internet);
- your computer device details (PC, tablet, smartphone, watch etc.);
- the make and version of web browser (e.g. Internet Explorer, Firefox, Safari, Opera, Chrome) you are using;
- your operating system (e.g. Windows, Windows Phone, OSX, iOS, Android, Linux etc);
- your time-zone;
- your browser plug-ins;
- any web-page you came from, identified as the referrer web page address by your web browser;
- cookies (as per our cookie policy <https://www.highlandexplorertours.com/essential-info/privacy-security-policy/>);
- identifiers assigned to you by third-party advertising providers and web beacons you interact with;
- page response times;
- download error;
- pages and parts of pages you visit;
- usage you make of our website, including enquiries and searches undertaken, and registrations for accounts, forums etc.;
- services and products you viewed;
- length of visit to website and pages;
- page interaction information (such as scrolling, keys pressed, mouse clicks, touches, and mouse-overs).

This will normally be collected and used anonymously, and aggregated for analysis, with your name and any characteristics identifying you remaining anonymous, but our privacy policy will apply, and it will be treated as your personal data, if this information is in any way linked to you personally.

This information may also include:

- data inputted into forms and fields;
- registrations for any accounts,
- forum,
- feedback mechanism,
- social functionality,
- newsletters or other features of our site;
- usernames and passwords,
- log-in / out history, and settings;
- actions taken within any account or other registration, including view and update and

changes to settings; and posts to any forum, feedback, review, or other social functionality on our website.

Such information will be treated as personal data and processed according to this privacy policy.

## **7. How we collect or generate your personal data**

This section sets out the ways in which we may collect or generate personal data concerning you.

### **7.1 Visiting our website**

By visiting and using our website you or your computer may provide personal data. This includes: information which is automatically provided by your browser to our servers; information recorded on our web servers about your interaction with our website and pages viewed; information we capture or place on your computer or generate using cookies or other technologies on our website; and information you input into forms and fields on our website. This is more detailed in our cookie policy <https://www.highlandexplorertours.com/essential-info/privacy-security-policy/>

### **7.2 Data you provide**

Your personal data will include data you provide (or later amend), whether:

- from correspondence with you;
- verbally to us over the phone or in person;
- by filling in any field or form on a website;
- by filling in any printed form we provide you with;
- by e-mail;
- from documents you provide us with; and
- from updates to any information you provide to us from time to time.

This includes when you:

- register or subscribe for any service, account, members, or loyalty program,
- make an enquiry or booking for a holiday or other travel services whether in person, by phone, through our website or otherwise;
- send us your comments or suggestions;
- subscribe to any newsletter or other publication;
- and request sales and advertising information, including brochures.

### **7.3 User Generated Content (UGC)**

We may process, Information or content provided by you in relation to your feedback or experience on a past, current or future trip with us. We will only use such content and images you have submitted to our social media channels or websites, if you have given consent to let Highland Explorer Tours and TTC subsidiary companies to process this information in various initiatives. These could include any marketing activities such as:

- Print materials
- on our website
- email activities
- social posts
- images on our trips
- provide images to our trade partners to use on their websites, email marketing and other marketing initiatives
- make available in our content feeds
- We would share imagery in our content feeds, image repositories, via email and



share with our trade partners via these methods

- Any other information provided to us by or in relation to you which concerns you as an individual.

#### **7.4 Data obtained from third parties**

We may obtain personal data concerning you from third parties, including from:

- providers of any holidays, accommodation, other travel services which are enquired about or booked, and their intermediaries;
- credit, fraud, identity and other searches we may undertake, including searches with public records and regulatory and private organisations;
- Any business or organisation you are associated with; from telephone numbers identified by the telephone system when you telephone us.

#### **7.5 Data generated by us**

We and any suppliers or sub-contractors working for us may generate personal data relating to you, including:

- in connection with responding to and dealing with any enquiry, booking or complaint; or
- in performing any booking or other contract with you; or
- through the analysis of your personal data; or
- data gained from your use of our website according to our cookie policy.

We may record telephone calls with you for training and quality purposes.

### **8. What do we use your personal data for?**

This section sets out the uses which we make of your personal data and the legal basis on which we rely to do this.

#### **8.1 Operate our website**

To operate and provide the search, booking, accounts, review, forums and other services, facilities, and functions of our websites. This includes managing any accounts or registrations you have with our websites and making changes to your settings and profile at your request.

#### **8.2 Provide information and respond to enquiries**

To provide information to you about our website, systems, and services, including to respond to booking enquiries and searches for holidays and travel, and to keep you updated generally. We process your data because you ask us to take the relevant steps in order to enter into a contract, or because we perform a service that you asked us to provide.

#### **8.3 Bookings and other contracts**

To enable you to make bookings, and to fulfil, provide, perform, administer, manage, and enforce all bookings, orders, and other contracts which relate to you (including if you are a passenger in a booking made by someone else), and to process any transactions authorised or made with us which relate to you. We process your data because you ask us to take the relevant steps in order to enter into a contract, or because we perform a service that you asked us to provide.

#### **8.4 Payments**

To collect and make payments due and administer our accounts. This is necessary for the preparation of any contract between us.

#### **8.5 Communication with customers**

To communicate with you concerning any enquiries, bookings, travel services provided,



problems and complaints, and to respond to any submissions, enquiries or requests from you. We process your data because you ask us to take the relevant steps in order to enter into a contract, or because we perform a service that you asked us to provide.

## **8.6 Record Keeping**

To keep internal records and maintain reasonable archives, including concerning as to enquiries, bookings, contracts, travel services, and complaints. This is done on the basis of our legitimate interests in ensuring our business is protected or run efficiently, or because we have the legal obligation to do so.

## **8.7 Manage and improve our business**

To analyse, audit, provide, operate, administer, maintain and improve our business, website, systems, and services;

- to carry out surveys and analyse the results;
- to run promotions and competitions;
- undertake product or customer research/development;
- to assist us in and help us to improve our sales;
- to carry out other business development and improvement activities;
- to provide training to our staff, sub-contractors and suppliers;
- editorial, advertising, and marketing processes, including sharing of photographs which you have voluntarily participated in during our Trips. Such photos may be shared across our social media channels such as Facebook, Instagram, Twitter or LinkedIn. These images will not be shared for any use other than to promote our Travel experiences. Please remove yourself from group photos organized by Trip Directors if you do not wish to be photographed;

For example, we may use your personal data to help us profile how our customers generally are using our websites and booking travel services with (or through) us. We may also use this information to ascertain interests so that we can better tailor our business offerings. This is done on the basis of our legitimate interests in ensuring our business runs efficiently.

## **8.8 Direct marketing**

To carry out direct marketing to you, in particular to identify you as a customer and to identify your product and service preferences and to provide personalized content and ads informing you of new or additional products, services, and/or promotions that may be of interest to you. We may engage in direct marketing via the following means depending on the details you have provided to us: text messages, phone calls, targeting you on social media platforms on your personal computer and mobile device, direct mail, post, web advertising, in third-party apps, in our apps. See section 10.1 for the types of products we may market to you this way.

## **8.9 Advertising**

To report aggregate information concerning usage of our websites to our advertisers. We normally create anonymous statistical data about browsing actions and patterns, and do not identify any individual.

## **8.10 Anything you have specifically consented to**

For any purpose which we have obtained your consent to. We will do this only where you have a choice whether to consent or not, you have control over that data and you have had to take an affirmative step to give consent on an informed basis. We will ensure that you can withdraw your consent at any time by providing simple mechanisms if you would like to do so.

## **8.11 Consequences of Not Providing your Data**

You are not obligated to provide your personal information, however, where the information is required for us to provide you with our services/deliver your products, we may not be able to offer some/all our services without it. Sometimes, providing your data to authorities

when you travel is a legal obligation for us.

## 9. Period for retaining your data

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.

If you would like to know more about our data retention policy, please ask us.

## 10. Use of your personal data for direct marketing

We do not use or disclose your personal data for direct marketing purposes unless:

- we have obtained your consent to do so, such as through an opt-in box on any form or website of ours; and/or
- you have made a booking with us and there is our legitimate business interest to do so for similar products or services.

If you do not want to receive direct marketing activities anymore, you can manage your communications preferences by emailing [marketing@radicaltravel.com](mailto:marketing@radicaltravel.com) or unsubscribe by following the link at the end of every of our electronic communications.

In addition to data protection law if we use your personal information for direct marketing purposes, we may also be subject to additional rules that regulate direct marketing, such as the EU Privacy and Electronic Communications Directive 2009/136/EC. The term “direct marketing” essentially means direct marketing material or advertising at a particular individual.

### 10.1 Direct marketing by us

We will use your personal data to send you marketing information (including adverts and details of promotions) about travel services:

- (1) offered by us;
- (2) which can be booked with third parties through us;
- (3) which can be booked with other companies within our group (i.e. the Travel Corporation Group); and
- (4) offered by third parties selected by us. However, we will not pass any of your details to third parties without your prior and specific consent.

Where applicable we will only send you marketing information about the categories of travel services you have selected. Also, we will only contact you in the manner you agreed to (e.g. by email or SMS).

### 10.2 Direct Marketing by Third Parties

From time to time, we may disclose your contact details (i.e. your name, email address, postal address, telephone number, mobile number, fax number and preferences) to:

- (1) other companies within our The Travel Corporation, which are bound by the same requirements set in this privacy policy; and
- (2) other companies which offer services that may enhance your travel experience or be able to help you to finalise your travel arrangements (“**third parties**”). Such third parties may

then contact you directly with marketing information about services and products offered by them. Such third parties are not part of The Travel Corporation and are not bound by this privacy policy. However, we ensure that our partners will only contact you in the manner you agreed to (e.g. email, text) when providing your consent.

### **9.3 Withdrawing from Direct Marketing**

You are free to stop receiving marketing information from us at any time by contacting us as detailed in this privacy notice or by following the instructions set out in our marketing communications. If you email us to withdraw your consent, it would be helpful if you could insert the word “Unsubscribe” as the subject heading.”

When you elect to stop receiving marketing information we will, from that point onwards, not share your information further with any other third parties.

You are also free, at any time, to notify any third party to whom we have previously passed your contact details to, that you no longer wish to receive marketing communications from them.

## **11. Disclosure of your personal data to third parties**

We transfer your personal data to third parties in the following circumstances:

### **11.1 Credit Checks etc.**

We may disclose your personal data to third parties (including intermediaries) as necessary to carry out any checks regarding your financial standing. The identities of these parties may change from time to time. They may include credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors.

### **11.2 Bookings and performance of contracts**

We disclose your personal data to third parties (including intermediaries) as necessary to deal with any booking enquiry being made by or for you, to make any booking requested by or for you, to perform and administer any booking for you or other contract with or in respect of you. This may include;

- to apply for visas on your behalf,
- to collect payments to be made by you,
- to investigate and respond to complaints, and
- to enforce any booking or other contract with you.

Such third parties may include any suppliers or sub-contractors and their agents (e.g. airlines, coach, ferry or train companies, hoteliers, hire companies, cruise companies, tour operators etc.). The identities of these parties may change from time to time and are engaged so we can provide our services to you. We ensure that these third parties carry their tasks with the same level of protection on your personal data that you will expect from us.

### **11.3 Suppliers of travel and other services**

We may disclose your personal data to any third party (e.g. supplier, contractor sub-contractor) we make any enquiries with concerning or engage or sub-contract to perform any booking or other contract, including to provide any travel, tour or other products or services we have agreed to provide to you in order to perform our contract with you.

We may disclose your personal data to any supplier with whom we make any enquiry concerning or book any travel or other products and services for you as agent (whether as agent for you, someone representing you, or the supplier), such as a tour operator. Details of any third party tour operators or other third parties who will be responsible for or supply you with the travel services booked or enquired about, may be obtained from us on request, and may be stated in any tour or other brochure provided by us.

### **11.4 Insurance**

If any application is made through us for any travel or other insurance to cover you, we

will pass your personal data on to the insurer. Information provided by you may be put on to a register of claims and shared with other insurers to prevent fraudulent claims.

## **11.5 Business Function Outsourcing**

Where we use third parties to host, provide, operate or supply any part of our websites, databases, systems, business, or services, or carry out on our behalf any of our business functions or actions (including sending mail, processing payments, providing marketing assistance, providing customer and advertising analysis through third-party ad-tech vendors, and providing customer services), then we may provide your personal data to them as required for use for or processing as part of those purposes. We ensure that these third parties treat your personal data with the same level of care and duty as us.

## **11.6 Public forums etc.**

Where any facility on our website is clearly designed to make certain of your personal data public (e.g. posts you make to any public forum or reviews facility), then any personal data you provide in relation to that forum or other facility, which is provided in circumstance where it is clear that it is intended to be published, will be disclosed to the public accordingly, subject to moderation by us and to the terms of this privacy policy.

## **11.7 Legal requirements**

We may supply personal data to a government authority or regulator where required to:

- comply with a legal requirement,
- for the administration of justice or when required by a public enforcement body, or
- for the purposes of customs, visas and immigration.

We may disclose your personal data where otherwise required by or permitted by law.

## **11.8 Direct Marketing by third parties**

We may disclose your personal data to third parties to carry out direct marketing to you, where you have given your prior consent. Please refer to the direct marketing section above for more information.

## **11.9 Business Customers who are businesses (not individuals)**

If you are a business or organisation (“**Business Customer**”), and we are holding personal data of any authorised representative (such as an employee agent, employee, officer, owner, partner, or director), then we may disclose to them that personal data.

If a Business Customer is making a booking or booking enquiry on behalf of an individual, with that person’s authority, then we may disclose to our Business Customer that individual’s personal data as reasonably required in connection with such booking or enquiry, or the subsequent performance of or payment for any booking made.

## **11.10 Business acquirers**

If our business is ever transferred to a third party, then your personal data will be transferred to the acquirer to enable them to continue our business. We will ensure that the acquirer is bound by terms similar to this privacy policy to protect your personal data.

## **12. How third parties will handle your personal data**

Where we provide your personal data to a third party one of the following two circumstances will apply:

### **12.1 Processing on our behalf**

In some cases, your personal data may be held and otherwise processed by others on our behalf. We have not included the names of our service partners as these will change over time. We will remain responsible for what they do with your personal data, and your personal data will only be held and processed by them in accordance with our instructions and this privacy policy. The sharing of your data is necessary for the performance of any contract with you and for the efficient provision of our services.

## 12.2 Processing on their own account

In other cases, your personal data may need to be provided to them to be held and processed by them in their own right and on their own account. In such case, they will have their own responsibility for your personal data, subject to their own privacy policy, and we will not be responsible for what they do with it following disclosure. This will only be done to perform the contract. When this happens, you will be informed by the third party and they will provide their privacy policy to you.

## 13. Location of your personal data

We (and any affiliate, subcontractor or other person processing your personal data on our behalf) may transfer, store and otherwise process your personal data anywhere within the European Economic Area (“EEA”) and the United Kingdom.

We will only send your personal data outside the EEA and the United Kingdom to companies either within our group or to parties with whom we have a contract based on the Standard Contractual Clauses as published by the European Commission. We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. This means within our group and for those other organisations with whom we have contracts we ensure that we have in place adequate safeguards in respect of such transfers outside the EEA and the United Kingdom. You can find out about what adequate safeguards these are by contacting us using the details provided in Section 16 of this privacy notice.

## 14. Keeping your data secure

### 14.1 Our security measures

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- using secured servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to the information
- using Secure Sockets Layer (SSL) and Transport Layer Security (TLS) software or other similar encryption technologies to encrypt your personal and payment transactions.

Unfortunately transmission of information over email is not secure, and if you submit any information to us over the internet by email we will do our best to protect your personal data and have contractual processes in place with our service providers to do this. Once we have received your information, we will use relevant procedures and adequate security measures to prevent unauthorised access.

For your own privacy protection, we encourage you to maintain anti-virus and other malware protection software on your computers and other devices, and to maintain your own measures to protect your personal data. Please do not include sensitive personal data in any e-mails you may send to us, including payment card information.

We also encourage you to be careful about who you give personal data to. We never contact you to ask you for your payment card information, or sensitive personal data such as passport numbers or log-in details, and we will only ask you for such information in person or through our website, or by telephone in connection with a booking you are making or have made. Please let us know if you someone purports to contact you in our name.

## 15. Your Rights

You have certain rights under data protection laws, which we summarise below. If you

contact us about these rights, we may ask for proof of your identity before we act on any request, and we may refuse to act if you do not provide this or your identity is not established by you. This is to ensure that your data is protected and kept secure. More information about your rights and our obligations can be found on Commissioner Office website <https://ico.org.uk/>.

To exercise any of your rights below, please use a dedicated online form <https://ttc.com/personal-data-request/>, or send your request via email to [compliance@ttc.com](mailto:compliance@ttc.com).

You may request the following information be provided to you:

- whether we are processing personal data about you;
- what personal data we are processing, including a request for a copy of your data;
- what purposes we are processing data for;
- from which sources we have collected the data;
- who we disclose the data to;

We will act within one month after receiving a valid request (i.e. when we will have been able to identify you as the data subject). If your request is complex, or if we have a high volume of requests, we may extend this period for two additional months. We will advise you if this is the case.

The law does allow us, in certain cases, to refuse to act upon your request or to charge a reasonable administration fee, if we estimate that the request is manifestly unfounded or excessive. We will advise you at the time if this is the case along with your possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

## **15.1 Rectification**

You have the right to have your personal data amended if it is inaccurate or incomplete.

## **15.2 Right to object**

You have the right to object to the use of your personal information for direct marketing or where we use it on the basis that we say we have a legitimate interest in using it.

## **15.3 Erasure**

You have the right to have your personal information deleted or removed in the following circumstances:

- The data is no longer necessary for the purpose for which it was originally collected or otherwise processed;
- Where you withdraw your consent, where consent was used as the legal basis for processing;
- Personal data has been unlawfully processed;
- When you object to the processing and we have no overriding legitimate interest for continuing the processing;
- Erasure is required for compliance with a legal requirement; or
- Data has been collected in relation to the offering of online services to a child.

When a request for erasure is valid, we will take reasonable steps to inform third parties which are processing the personal data that you have requested us to delete.

We have the right to refuse to act on a request of erasure if the data is necessary for:

- Exercising the right of freedom of expression and information;
- Compliance with a legal obligation;
- The establishment, exercise or defence of legal claims;



## 15.4 Portability

You have the right to receive your personal data which you have provided to us, in a structured, commonly used and machine-readable format and to transmit those data to another controller, when:

- the processing is based on consent or on a contract; and
- the processing is carried out by automated means.

## 15.5 Restrict Processing

You have the right to obtain from us the restriction of processing of your personal data where one of the following applies:

- You contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data;
- The processing is unlawful, and you oppose the erasure of the personal data and request the restriction of their use instead;
- We no longer need the personal data for the purposes of the processing, but the data is necessary for you for the establishment, exercise or defence of legal claims;
- You have objected to processing pending the verification whether our legitimate grounds override yours.

Where the processing of your personal data is restricted, at the exception of storage, we will only process your personal data with your consent, for the establishment, exercise or defence of legal claims, for the protection of the rights of another individual or organisation, or because we are legally required to do so.

We will inform you before the restriction of processing is lifted.

## 15.6 Right to withdraw your consent

You are free to withdraw your consent at any time, where we rely on your consent as a legal basis for processing. Please contact us using the details outlined in Section 16 of this policy. See also section 10.3 for details as to how to object to our direct marketing communications.

## 15.7 Right to lodge a complaint with a supervisory authority

The laws we comply with are regulated by the Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF, or call 03031231113 and online at <https://ico.org.uk/make-a-complaint/> and for other member states, the independent supervisory authority responsible for monitoring the application of the regulation. In addition to your rights above, it is open to you, if you have a complaint or a concern, to seek assistance from this supervisory authority who has powers to compel us to comply with applicable laws and fine us for non-compliance. However, before you do so, we would hope that you will contact us first to discuss any complaint or concerns you have. You can contact us using the details provided in Section 16 of this our privacy notice.

### Changes to this privacy policy

We keep our privacy notice under regular review to make sure it is up to date and accurate. When we make any change, we will notify you by email of such change. You can check the top of the document to see the latest version in force.

### Applicable Law and Disputes

Our privacy policy is subject to the law of Scottish Courts & Tribunals disputes can be determined by the courts.

## 16. Contacting us

If you have any questions about our privacy policy or about how we process your personal data, including any requests or complaints, please contact us either by e-mail to [compliance@ttc.com](mailto:compliance@ttc.com), telephone on +44 (0) 131 558 3738, or by post to Graeme Ward, Radical Travel Group Ltd, Atholl Exchange, 6 Canning Street, Edinburgh, EH3 8EG.



## **17. About us**

This is the privacy policy of Radical Travel Group Ltd (referred to as "**we**", "**us**" or "**our**"). We are incorporated under the laws of Scotland. Our incorporation number is SC136334 and our incorporation address or registered office is Radical Travel Group Ltd, Atholl Exchange, 6 Canning Street, Edinburgh, EH3 8EG Copyright notice

## **18. Copyright notice**

This document, and all content of our websites is Copyright© July 2021 Radical Travel Group Ltd. ALL RIGHTS RESERVED.

**End of Document**