



## PRIVACY STATEMENT

### Background

This Privacy Notice sets out how Norad Travel Group protects the privacy of your personal information. As a travel agency business we need to collect, use and disclose personal information in order to perform our business functions and activities, including making and managing travel bookings on behalf of our customers. We are firmly committed to protecting the privacy and confidentiality of personal information and to maintaining various physical, electronic and procedural safeguards to protect personal information in our care.

We will be a data controller for the purposes of the General Data Protection Regulation 2016/679 (GDPR) for any personal information you provide to us in connection with our relationship.

By providing personal information to us, you agree that this Notice will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as detailed in this Notice. If you do not agree with any part of this Notice, you must not provide your personal information to us. If you do not provide us with your personal information, or if you withdraw a consent that you have given under this Notice, this may affect our ability to provide services to you or may negatively impact the services we can provide to you.

### What personal information do we collect?

Personal information has the meaning given under UK data protection law, and, where the GDPR applies, the meaning of personal data given under the GDPR. Personal information generally means information which relates to a living individual who can be identified from that information, or from that information and other information in a person's possession, including any expression of opinion, whether true or not, and whether recorded in material form or not, about an identified or reasonably identifiable individual, and any indication of intention in respect of an individual.

The type of personal information we collect about you is the information needed to facilitate travel bookings and to arrange travel related services and/or products on your behalf. These typically include contact information such as name, mailing address, telephone number, email address, payment account information such as credit/debit card details, including card type,

card number, security number and expiry date, passport details, loyalty program and frequent flyer details, information about your dietary requirements and health issues (if any) and other details relevant to your travel arrangements or required by the relevant travel service provider(s) (e.g. airlines and accommodation or tour providers).

When you make contact with us for other purposes, we may also collect personal information about you in relation to those purposes. For example, we may collect your personal information so we can contact you about a competition you have entered or to respond to an enquiry or feedback from you. To the extent permitted or required under data protection laws, you consent to us using and disclosing your information for the purpose for which it was collected, unless we subsequently receive your consent to use it for another purpose.

### **How do we collect personal information?**

We will only collect personal information in compliance with UK data protection laws. We usually collect your personal information from the information you submit during the course of your relationship with us. We will collect this information directly from you unless it is unreasonable or impracticable to do so. Generally, this collection will occur when you deal with us either in person, by telephone, letter or email, when you visit any of our websites or when you connect with us via social media. We may also collect personal information about you when you purchase or make enquiries about travel arrangements or other products and services, when you enter competitions or register for promotions, and when you subscribe to receive marketing communications from us.

We may also collect your personal information when you complete our customer feedback surveys.

In some circumstances, it may be necessary to collect personal information about you from a third party. This includes where a person makes a travel booking on your behalf which includes travel arrangements to be used by you (e.g. a family or group booking, or a travel booking made for you by your employer). Where this occurs, we will rely on the authority of the person making the travel booking to act on behalf of any other traveller on the booking. In this circumstance you agree you have obtained the consent of the other person for us to collect, use and disclose the other person's personal information in accordance with this Notice and that you have otherwise made the other person aware of this Notice. You should let us know immediately if you become aware that your personal information has been provided to us by another person without your consent or if you did not obtain consent before providing another person's personal information to us.

We make every effort to maintain the accuracy and completeness of your personal information which we store. You can assist us by promptly contacting us if there are any changes to your personal information, or if you become aware that we have inaccurate personal information relating to you. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal information that you, or a person acting on your behalf, provide to us.

### **How do we use your personal information?**

We will only process your information where you have given your consent to such processing, which you may withdraw at any time. Furthermore, where the processing is necessary to provide our services to you, is necessary for compliance with our legal obligations, and/or is necessary for our legitimate interests or those of any third party recipients that receive your personal information. For example, if you book a flight through us, then we use your personal information to enable your flight to be booked and disclose it to the airline to enable the airline to provide the flight service to you.

We may therefore share your information with our travel service providers such as hotel, airline, car rental, or other providers who fulfil your travel bookings. For more information about the disclosure of personal information to travel service providers located overseas, please see below.

We may use your personal information to send you targeted marketing activities relating to our products and services (and those of third parties) that we think may interest you, unless you have requested not to receive such information. These may include mailings and digital marketing. We will only use your personal information to send electronic marketing materials to you if you have opted-in to receive them. You can subscribe to receive e-newsletters and other electronic marketing materials by following the relevant links on our website. Should you no longer wish to receive marketing material from us, participate in market research or receive other types of communication from us, please refer to the Contact section below. You can unsubscribe from receiving electronic marketing materials by following the unsubscribe prompt in your email, SMS or other form of electronic marketing.

### **Is personal information disclosed to third parties?**

We do not and will not sell, rent out or trade your personal information. We will only disclose your personal information to third parties in the ways set out in this Notice and in accordance with UK data protection laws. Note that, in this Notice, where we say "disclose", this includes to

transfer, share (including verbally and in writing), send, or otherwise make available or accessible your personal information to another person or entity.

We will not disclose your personal information without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety of an individual or to public health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), or where such disclosure is authorised or required by law (including applicable privacy / data protection laws).

### **Is personal information transferred overseas?**

We may disclose your personal information to certain overseas recipients. We will ensure that any such international transfers are either necessary for the performance of a contract between you and the overseas recipient or are made subject to appropriate or suitable safeguards as required by data protection laws (e.g. GDPR).

It is possible that information will be transferred to an overseas recipient located in a jurisdiction where you will not be able to seek redress under UK data protection laws and that does not have an equivalent level of data protection. To the extent permitted by UK data protection laws, we will not be liable for how these overseas recipients handle, store and process your personal information.

We may also disclose your personal information to third parties located overseas for the purpose of performing services for us, including the storage and processing of such information. Generally, we will only disclose your personal information to these overseas recipients in connection with facilitation of your travel booking and/or to enable the performance of administrative and technical services by them on our behalf.

### **Security of information**

We are committed to safeguarding and protecting personal information and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal information provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal information transmitted, stored or otherwise processed. We will destroy or de-identify personal information once we no longer require it for our business purposes, or as required by law.

## **Your rights in relation to the personal information we collect**

If you wish to update, modify, delete or obtain a copy of the personal information that we hold on you, or restrict or stop us from using any of the personal information which we hold on you, including by withdrawing consent you have previously given to the processing of such information, or where any personal information has been processed on the basis of your consent or as necessary to perform a contract to which you are a party, request a copy of such personal information in a suitable format by emailing us at the address set out in Contact section of our web site[s]. You will receive acknowledgement of your request and we will advise you of the timeframe within which you will receive your information pack.

We reserve the right to deny you access for any reason permitted under applicable laws. Such exemptions may include national security, corporate finance and confidential references. If we deny access or correction, we will provide you with written reasons for such denial unless it is unreasonable to do so and, where required by UK data protection laws, will note your request and the denial of same in our records.

Please note that, if you request that we restrict or stop using personal information we hold on you, or withdraw a consent you have previously given to the processing of such information, this may affect our ability to provide services to you or negatively impact the services we can provide to you. You must always provide accurate information and you agree to update it whenever necessary. You also agree that, in the absence of any update, we can assume that the information submitted to us is correct, unless we subsequently become aware that it is not correct. You can at any time tell us not to send you marketing communications by email by clicking on the unsubscribe link within the marketing emails you receive from us or by contacting us as indicated above.

In any of these situations we may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of personal information.

## **Social media integrations**

Our websites and mobile applications may use social media features provided and operated by third party companies (e.g. Facebook) and either hosted by a third party or hosted directly on our website. Social media companies may collect information such as the page you are visiting on our website, your IP address, and may set cookies to enable the feature to function properly. If you are logged into your account with the third party company, then the third party may be able to link information about your visit to and use of our website to your social media account with them. Similarly, your interactions with the Social Media features may be recorded by the

third party. In addition, the third party company may send us information in line with their policies, such as your name, profile picture, gender, friend lists and any other information you have chosen to make available, and we may share information with the third party company for the purposes of serving targeted marketing to you via the third party social media platform. You can manage the sharing of information and opt out from targeted marketing via your privacy settings for the third party social media platform.

Your interactions with these features are governed by the privacy policy of the third party company providing them. For more information about the data practices of these third party companies, and to find out more about what personal information is collected about you and how the third party uses such personal information, please refer to their privacy policy directly.

### **IP addresses**

When you access our website or open electronic communications from us our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer, and which are generally assigned when you access the internet. We may use IP addresses for system administration, investigation of security issues and compiling anonymised data regarding usage of our website and/or mobile applications. We may also link IP addresses to other personal information we hold about you and use it for the purposes described above (e.g. to better tailor our marketing and advertising materials, provided you have opted in to receive electronic marketing).

### **Tracking technologies / cookies**

We may use third-party web analytics services on our websites. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites.

### **Linked sites**

Our websites may contain links to third party websites over which we have no control. We are not responsible for the privacy practices or the content of such websites. We encourage you to read the privacy policies of any linked third party websites you visit as their privacy policy and practices may differ from ours.

### **Feedback / complaints / contact**

If you have any enquiries, comments or complaints about this Notice or our handling of your personal information, or wish to inform us of a change or correction to your personal

information, would like a copy of the information we collect on you or would like to raise a complaint or comment, please contact us via the appropriate Contact section on our website.

### **Changes to our Notice**

We may amend this Notice from time to time. If we make a change to the Notice, the revised version will be posted on our website. We will post a prominent notice on our website to notify you of any significant changes to our Notice and indicate at the end of the Notice when it was most recently updated. This Privacy Notice was last updated on 22 February 2018.