
GENERAL PRIVACY POLICY/NOTICE

BACKGROUND:

The Travelwallet Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

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 your personal information in our care.

1. Information About Us

We are The Travelwallet Limited.

A limited company registered in England under company number 9472594.

Registered address: 67 Whitburn Street, Bridgnorth, England, WV16 4QP.

Data Protection Officer: [Vicki Pelucci-Woodhall].

Email address: enquiries@thetravelwallet.co.uk

Telephone number: 01746 711 999

Postal Address: as registered office.

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can

always contact us to find out more or to ask any questions using the details in Part 11.

- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Payment information;
- Passport details
- [Business name;]
- [Job title and employment record;]
- [Profession;]
- [Information about your preferences and interests;]

6. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

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

<p>or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Recording telephone conversations</p>		<p>training and customer service)</p>
<p>To enable you to subscribe for our newsletter, take part in a prize draw, promotion or competition or complete a survey, and to supply you with information by email and/or post that you have opted-in to (you may unsubscribe at any time)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>

<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

(Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.)

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We do not presently use automated systems for carrying out certain kinds of decision-making or profiling.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept in accordance with our Data Retention Policy. A copy of which can be requested by contacting us.

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures. For details, please ask.

9. Do You Share My Personal Data?

We may sometimes contract with the third parties to supply products and services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

Your personal information may be disclosed to the following types of third parties:

- our contractors, suppliers and service providers;
- in each of the circumstances set out in section 6 (“How do you use my personal data?”);
- suppliers of IT based solutions that assist us in providing products and services to you (such as any external data hosting providers we may use);
- publishers, printers and distributors of marketing material;
- event and expo organisers;
- marketing, market research, research and analysis and communications agencies;
- mailing houses, freight services, courier services; and
- external business advisers (such as lawyers, accountants, auditors and recruitment consultants);
- our related entities and brands;
- travel service providers such as travel wholesalers, tour operators, airlines, hotels, car rental companies, transfer handlers and other related service providers;
- any third party to whom we assign or novate any of our rights or obligations;
- a person making your travel booking on your behalf, where you are travelling on a booking made on your behalf by another person (for example, a family member, friend or work colleague);
- your employer, where you are an employee of one of our corporate, business or government clients and you are participating in an event or travelling for work purposes;
- a person who can verify to us that they have a relationship with you (e.g. a family member) where you are not contactable, the person correctly answers our required security questions and the request is, in our opinion, in your interest (for example, where the person is concerned for your welfare or needs to undertake action on your behalf due to unforeseen circumstances);
- as required or authorised by applicable law, and to comply with our legal obligations;
- customs and immigration to comply with our legal obligations and any applicable customs/immigration requirements relating to your travel;

- government agencies and public authorities to comply with a valid and authorised request, including a court order or other valid legal process;
- various regulatory bodies and law enforcement officials and agencies, including to protect against fraud and for related security purposes; and
- enforcement agencies where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. **Social Media Integrations**

Our websites and mobile applications may use social media features and widgets (such as "Like" and "Share" buttons/widgets) ("SM Features"). These are provided and operated by third party companies (e.g. Facebook) and either hosted by a third party or hosted directly on our website or mobile application. SM Features may collect information such as the page you are visiting on our website/mobile application, your IP address, and may set cookies to enable the SM 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 or mobile application to your social media account with them. Similarly, your interactions with the SM 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 SM 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.

11. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 12.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within **28 days** and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please contact our Data Protection Officer using the following details (for the attention of Vicky)

Email address: enquiries@thetravelwallet.co.uk

Telephone number: 01746 711 999

Postal Address: 67 Whitburn Street, Bridgnorth, England, WV16 4QP

13. **Changes to this Privacy Policy/Notice**

We may change this General Privacy Policy/Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available via the Company's website. We will post a prominent notice on our website to notify you of any significant changes to our Policy and indicate at the end of the Policy when it was most recently updated.