

# PRIVACY POLICY

Sam Smith Travel Limited and Strachan Sports Travel's Privacy Policy sets out what information we collect, how we collect it, and what we do with it. Our Privacy Policy applies to you and is available on our website and through other channels. In all your dealings with us you must ensure that others you represent are aware of the content of our Privacy Policy and consent to your acting on their behalf.

## INFORMATION ABOUT YOU

### Your Information

This refers to a combination of information such as your name, contact details, travel preferences and special needs/disabilities/dietary requirements that you supply us or is supplied to us, including your social preferences, interests and activities and any information about other persons you represent (such as those on your booking). Your information is collected when you request information from us, contact us (and vice versa), make a booking, use our website(s)/apps, link to or from our website(s)/apps, connect with us via social media and any other engagement we or our business partners have with you. We will update your information whenever we can to keep it current, accurate and complete.

### Our Use of Your Information

(1) For the purpose of providing you with our services, including your flight, holiday, security, incident/accident management or insurance, etc., we may disclose and process your information outside the UK/EEA. In order for you to travel abroad, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your information for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. Some countries will only permit travel if you provide your advance passenger data (for example Caricom API and US secure flight data). These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate.

(2) We may collect and process your information for the purposes outlined and in our registration with the Office of the Information Commissioner, we disclose the same to our service providers e.g. airlines, hotels etc who act as "data processors" on our behalf, or to credit and fraud agencies (some of whom are located outside the UK/EEA). These purposes include administration, service, quality and improvement-related activities, customer care, product innovation and choice, business management, operation and efficiencies, re-organisation, risk assessment/management, security, fraud and crime prevention/detection, monitoring, research and analysis, social media, reviews, advertising and marketing, profiling customer purchasing preferences, activities and trends, dispute resolution/litigation, credit checking and debt collection.

(3) Information (such as health or religion) may be considered "sensitive personal data" under the Data Protection Act 1998. We collect it to provide you with our services, cater to your needs or act in your interest, and we are only prepared to accept sensitive personal data on the condition that we have your positive consent. By booking with us you also agree for

your insurers, their agents and medical staff to exchange relevant information and sensitive personal data with us in circumstances where we/they need to act on your behalf or in the interest of passengers or in an emergency.

(4) Other than information that we disclose for the necessary requirements of service providers and government authorities to enable you to travel, we DO NOT share your personal data with any third parties.

(5) Furthermore, we will not hold your data for longer that is necessary.

If you do not agree to Our Use of Your Information above, we cannot engage/do business with you or accept your booking.

## **Marketing Material**

(1) Using your information, we may from time to time contact you with or make available to you (directly or indirectly) information on offers of goods and services, brochures, new products, forthcoming events or competitions from our trading divisions. We will tailor the information you receive or see; this will enable us to make available to you more personalised and relevant communications. We may use innovative technologies and work with business partners to achieve this.

(2) We will assume you agree to provide us with your email not only for bookings but in other situations such as competitions, promotions, prize draws and social media.

(3) If you do not wish to receive such information or would like to change your preference, please refer to “Your Rights” below.

## **Your Rights**

- (1) You have the right to have your personal data rectified if it is inaccurate or incomplete.
- (2) You also have the right ask in writing not to receive direct marketing material from us. Once properly notified by you, we will take steps to stop using your information in this way.
- (3) Should you be unhappy with how we use your personal data, you can complain to the Information Commissioner’s Office [www.ico.org.uk](http://www.ico.org.uk)

## **Foreign Controls**

Outside the European Economic Area (EEA), data protection controls may not be as strong as the legal requirements in this country.

## **USE OF LINKS TO OTHER WEBSITES**

Our website(s) may contain links to third party websites or micro-sites not controlled or owned by us. For example, reference sites or ancillary products and services sites or websites owned by our sister companies. It is your responsibility to check the status of these sites before using them. Please read their applicable terms and conditions, etc. carefully.

## **MONITORING**

To ensure that we carry out your instructions accurately, improve our service and for security and fraud, we may review, monitor and/or record: (1) telephone calls; (2) transactions and activities at all points of contact; and (3) web, social media and app traffic, activities, etc. All recordings and derivative materials are and shall remain our sole property.

## **SECURITY STATEMENT**

We have taken all reasonable steps and have in place appropriate security measures to protect your information.

## **CHANGES TO THIS POLICY**

Any changes to this Policy will be either posted on our website, brochure and/or made available on request.

Privacy Policy: May 2018