

# SEO International Privacy and Data Protection Policy

SEO International Limited understands and respects the importance of your privacy and we are committed to safeguarding your personal information. In providing our service to you, we must collect personal information from you and this policy outlines how we treat your personal data after it has been collected by any of our channels which include our website, travel team and any future digital services or channels as they evolve.

## What information will we collect?

We may collect all or some of the following information whether you are a customer, supplier, website visitor, in any capacity; third party travel arrange or corporate client, job applicant or general enquirer, this information may relate to you, your Company and other members of your party:

- names and contact/address details including telephone number and email address;
- credit/ debit card or other payment details (including card number, cardholder name, expiry date);
- Passport details;
- special requirements such as those relating to any disability or medical condition which may affect the chosen arrangements;
- dietary restrictions (which may disclose your religious beliefs).

You are responsible for ensuring that other members of your party are aware of the content of this Policy and consent to your acting on their behalf in all your dealings with us. Some of the information we collect (such as about health or religion) may be considered “sensitive personal data” under the Data Protection Act 1998. We collect it to cater to your needs or act in your interest.

## How will we collect this information?

- We will only collect personal information from you by specifically asking for it:
- When you purchase a product or service with or through us
- When you subscribe to our publications
- When you register an account with us
- When you speak to our travel services team
- When we use cookies to see which website pages are the most popular

## What will we do with it?

1. We will use your name, address, bank and/or credit card details to complete your booking.
2. We will also use your details to manage your arrangements, send you notifications and communicate with you generally.
3. For the purpose of completing your booking, we may have to disclose some of your information to the providers of the services making up your arrangements (who could be located outside the UK/EEA). We may also have to disclose some information to third parties in relation to customer services, credit card processing, or other services.
4. We may need to disclose your information where required by law, where such a request is made by a legal authority.
5. We may need to disclose our customer list including any personal information relating to you to a third party who acquires or attempts to acquire our Company.

6. We may also disclose information to organisations who act as “data processors” on our behalf, or to other organisations that perform business functions on our behalf, some of whom are outside the UK/EEA. These functions include administration, providing services (and contacting you where necessary), customer care, business management and operation, risk assessment, security and crime prevention/detection, research and analysis, marketing, dispute resolution, credit checking and debt collection.
7. We may from time to time contact you with information about special offers, brochures, new products, forthcoming events or competitions. If you do not wish to receive such information, you may ask us in writing not to receive it.
8. We may pass your details to other parties who offer goods or services which we feel may be of interest to you. If you do not wish to have your details passed on in this way, you may ask us in writing not to do so.

We have taken all reasonable steps to have appropriate security measures in place to protect your information. Outside the European Economic Area, controls on data protection may not be as wide as the legal requirements in this country. The transmission of information via the internet is never completely secure. We exclude our liability for personal data lost in transmission to the website.

### **What can I do?**

If you do not agree to our use of the information as set out above, you should inform us as soon as possible by writing to us at SEO International Limited, 239 Kensington High Street, London, W8 6SN.

In accordance with the Data Protection Act 1998, you may ask us in writing for a copy of the information we hold about you (for which we may charge an administration fee) and to correct any inaccuracies in your information. We aim to respond to you within 21 days from the date of request. You can also choose not to provide us with some of the information we request, however as a result we may not be able to complete your arrangements.

### **Marketing Opt-Out Policy**

Marketing and updates, subscribers can opt out of receiving further information from us at any time by writing to us at the above address.

# Privacy Policy

## 1. IMPORTANT INFORMATION AND WHO WE ARE

**Your privacy is important to us** and the details below explain how we collect, use, transfer and store your personal data. We would encourage you to read this information.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

SEO International Limited is responsible for this website and is the 'data controller' for your data (collectively referred to as "SEO International Limited", "we", "us" or "our" in this privacy notice).

We may change this privacy notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

## 2. THE KIND OF INFORMATION WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, use, store and transfer different kinds of personal data about you (and about any other person you include) which we have grouped together as follows:

- **Identity Data** includes your name, title, date of birth, gender and passport details.
- **Contact Data** includes your address, email address and telephone numbers.
- **Sensitive Data** includes information concerning medical conditions, disabilities, religious or philosophical beliefs and criminal convictions and offences.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, survey and promotional responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Apart from the Sensitive Data referred to above, we do not collect any other **Special Categories of Personal Data** about you (this also includes details about your race, sex life, sexual

orientation, political opinions, trade union membership and information about your genetic and biometric data).

### **Information about other people**

You are responsible for ensuring that the other members of your travel party are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data to us to make a booking or other purchase on their behalf.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with our products and services). We will notify you if this is the case at the time.

## **3. HOW YOUR PERSONAL INFORMATION IS COLLECTED**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Sensitive and Transaction Data by filling in forms or by corresponding with us online or by post, phone, email or otherwise. This includes personal data you provide when you: apply to purchase our products and services; enquire about our goods and services; subscribe to our services or publications; request marketing to be sent to you; give us some feedback.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as follows: Contact, Financial and Transaction Data from providers of technical, payment and delivery services; Identity and Contact Data from data brokers or aggregators; Technical Data from the following parties; a) analytics providers; (b) advertising networks; and search information providers.(c) search information providers.

## **4. HOW WE USE YOUR PERSONAL INFORMATION**

It's important that you understand what we'll do with the data that we hold about you. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances: Where we need to perform the contract we are about to enter into or have entered into with you. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. Where we need to comply with a legal or regulatory obligation.

### **Purposes for which we will use your personal information**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. 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.

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>(e) Consent in relation to the processing of Sensitive Data such as your religious or philosophical beliefs</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our service, terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</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 and for colleague training and customer service)</p>
<p>To enable you to subscribe for our publications, take part in a promotion or complete a survey</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,</p>	<p>(a) Identity</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT</p>

data analysis, testing, system maintenance, support, reporting and hosting of data)	(b) Contact (c) Technical	services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you registered for a promotion.

## Third-party marketing

We will get your express opt-in consent before we share your personal data with any internal third parties outside for marketing purposes.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

## 5. SHARING YOUR PERSONAL INFORMATION

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- External third parties including the following: Travel companies, airlines, hotels, insurers and other organisations involved in performing your contract; Industry regulatory bodies such as the Civil Aviation Authority and ABTA; Government bodies or other organisations in the UK and in other countries, such as those responsible for immigration, border control, security and anti-terrorism;
- Organisations to which we may outsource certain of our activities, such as printing, mailing and distribution services; Organisations that provide customer identity and address verification services; Organisations for the detection, investigation and prevention of crime, such as the National Crime Agency in respect of money laundering; Financial organisations for purposes such as payment processing, finance plans and refunds; Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services; We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### International transfers

It may be necessary to pass your booking details to third parties, such as airlines, hotels and transfer providers, situated outside of the European Economic Area (EEA) in order to perform our contract with you. Whenever we do so, we will try to make sure that your personal information is adequately protected.

## KEEPING YOUR INFORMATION SECURE

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Any payment transactions will be encrypted using SSL technology. In addition, we limit access to your personal data to those colleagues, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## 6. DATA RETENTION

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.

## YOUR RIGHTS

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also

have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the CEO.

## **COMPLAINTS TO THE REGULATOR**

If you do not think that we have processed your data in accordance with this notice you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact them by going to their website at [ico.org.uk](http://ico.org.uk), phoning them on 0303 123 1113 or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.