

Your privacy is important to us

Version 1.0 // Last Updated 23 May 2018

For the purpose of the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”), www.yourholidaybooking.com is owned by YourHolidayBooking.com Ltd who are the Data Controller for this website, a limited liability company registered at 14 Hemmells, Laindon, Essex SS15 6ED with the registered company number 02000814.

This statement explains how we collect, use, transfer and store your personal data when you visit our website. We would encourage you to read this information.

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1. Important information and who we are

About this privacy notice

This privacy notice aims to give you information on how YourHolidayBooking.com Ltd collects and processes your personal information through your use of this website including when you enquire about the goods and services offered by YourHolidayBooking.com Ltd, sign up to a newsletter or take part in a competition.

This website is not intended for children and we do not knowingly collect information relating to children.

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 information about you so that you are fully aware of how and why we are using your information. This privacy notice supplements the other notices and is not intended to override them.

Who’s responsible for your personal information?

We refer to YourHolidayBooking.com Ltd in this statement. This means YourHolidayBooking.com Ltd and its subsidiaries and any brands it owns. YourHolidayBooking.com Ltd is responsible for this website and is the ‘data controller’ for your data.

How can you contact us?

We have appointed a data protection manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our Data Protection Manager at onlinesales@yourholidaybooking.com, by telephone on 0203 472 0303 or by writing to: Data Protection Manager, YourHolidayBooking.com Ltd, 14 Hemmells, Laindon, Essex SS15 6ED

If you do not think that we have processed your data in accordance with this notice you should let us know as soon as possible.

Changes to the privacy notice and your duty to inform us of changes

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.

Links to other websites

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow other parts of YourHolidayBooking.com Ltd and third parties to collect or share data about you. When you leave our website, we encourage you to read the privacy notice of every website you visit, particularly third party websites as we do not control those.

2. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data includes first name, last name, username or similar identifier, marital status, title, date of birth, country of birth and gender.

Contact Data includes address, email address and telephone numbers.

Transaction Data includes details about payments to and from you

Technical Data includes internet protocol (IP) address, 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.

Usage Data includes information about how you use our website.

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 your 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. 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 and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply to purchase our products and services whether via our sales agents or direct through our website;
- enquire about our goods and services
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers;
- (b) advertising networks; and
- (c) search information providers.

Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

Identity and Contact Data from data brokers or aggregators.

Identity and Contact Data from publicly available sources such as the Electoral Register.

4. How we use your personal information

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.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal information

We have set out below, 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 - To manage our relationship with you which includes:

- (a) Notifying you about changes to our terms or privacy policy
- (b) Asking you to leave a review or take a survey

Type of data used:

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Marketing and Communications

Lawful basis for processing including basis of legitimate interest:

- (a) Performance of a contract with you
- (b) Necessary to comply with a legal obligation
- (c) Necessary for our legitimate interests (to keep our records updated and to study how members/customers use our products/services)

Purpose/Activity - To enable you to take part in a prize draw, competition or to complete a survey

Type of Data used:

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Marketing and Communications
- (e) Usage

Lawful basis for processing including basis of legitimate interest:

- (a) Performance of a contract with you
- (b) Necessary for our legitimate interests (to study how members/customers use our products/services, to develop them and grow our business)

Purpose/Activity - To administer and protect our business and this website (including monitoring and recording communications, troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)

Type of Data used:

- (a) Identity
- (b) Contact
- (c) Technical

Lawful basis for processing including basis of legitimate interest:

- (a) Necessary for our legitimate interests (for running our business, quality assurance, training, provision of administration and IT 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

Purpose/Activity - To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you

Type of Data used:

- (a) Identity
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and Communications
- (f) Technical

Lawful basis for processing including basis of legitimate interest:

Necessary for our legitimate interests (to study how members/customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

Purpose/Activity - To use data analytics to improve our website, products/services, marketing, member/customer relationships and experiences

Type of Data used:

- (a) Technical
- (b) Usage

Lawful basis for processing including basis of legitimate interest:

Necessary for our legitimate interests (to define types of members/customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

Purpose/Activity - To make suggestions and recommendations to you about goods or services that may be of interest to you

Type of Data used:

- (a) Identity
- (b) Contact
- (c) Technical
- (d) Usage
- (e) Profile
- (f) Marketing and Communications

Lawful basis for processing including basis of legitimate interest:

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.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

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 entered a competition or registered for a promotion.

We won't use your personal data for marketing purposes at all if you've told us not to and we'll give you the opportunity to opt-out of receiving marketing information whenever we contact you directly for that purpose.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any external company outside The YourHolidayBooking.com Ltd Group for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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 paragraph 4 above.

Internal Third Parties such as other legal entities in The YourHolidayBooking.com Group who provide administrative services and undertake management reporting.

External Third Parties including the following:

- Organisations that provide outsourced printing, mailing and distribution services
- Organisations to which we may outsource certain other activities, such as database cleansing.
- Electoral Reform Services in connection with our Board member elections.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

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.

6. 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. 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your rights

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Your rights in connection with personal information

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 Society's Data Protection Manager.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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, phoning them on 0303 123 1113 or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

9.Cookie Policy

Our Use of Cookies

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

All Cookies used by and on Our Site are used in accordance with current Cookie Law.

Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

We use both session cookies and persistent cookies on Our Website. Session cookies exist only for the length of time that you visit our site and are deleted once you close your browser. Persistent cookies remain stored on your browser ready for use the next time you visit our website. Like most sites, We use a combination of both. Certain features of Our Site depend on Cookies to function.

When using our Site, the following Cookies may be placed on your computer or device:

- PHPSESSID - stores information about customer's selections in the booking journey
- rvhbxs - stores information about the recently visited hotel pages
- TawkConnectionTime - Live Chat software used to talk to You in realtime on Our Website
- _ga, _gat, _gid - Google Analytics Software used to analyse and track
- datr, dpr, fr, locale, pl, sb, wd, xs - Facebook Plugin used to interact with social media

Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

Changes to this Privacy Policy

We reserve the right to update or alter this Privacy Policy from time to time.