

Specialised Travel Ltd - Privacy Policy

Introduction

This is the Privacy Policy for Specialised Travel Limited, a company registered in England and Wales with company number 01472055, having its registered office at 12-15 Hanger Green, London, W5 3EL (“**STL**”, “**We**”).

This Policy sets out how STL uses and protects any personal data that you provide to STL (including personal data provided through the website www.stlon.com (“**Website**”). We are committed to protecting your personal data and this Policy and tells you about your privacy rights and how the law protects you.

STL provides services to individuals in connection with booking travel arrangements and services, and through providing services to individuals it may collect and process personal data about individuals (“**Services**”). In addition to this, the Website also collects certain personal data from users, in accordance with this Policy.

STL and its affiliated Group companies or brands (“**STL Group**”) are firmly committed to respecting and protecting the privacy of all personal data received or collected, in strict adherence to Data Protection Legislation (defined below) and best business practice. The STL Group has established this Policy so that you can understand the care with which we intend to treat your personal data.

How to contact us

We have a data privacy manager who is responsible (together with our Data Protection Committee) for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below. If you have any questions regarding your personal data and how we may use it, including any queries relating to this Policy, please contact us at data@stlon.com or writing to our “Data Privacy Manager” at the head office address noted above.

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

Terminology used

STL's data protection and privacy measures are governed by the (i) the General Data Protection Regulation ((EU) 2016/679) (“**GDPR**”) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998 (“**Data Protection Legislation**”).

For the purpose of Data Protection Legislation where personal data is provided directly to STL through use of the Website, email, meeting with you or other means where STL is determining the way in which that personal data is processed, then STL will be a data controller of such information.

Personal data and Basis for Collection

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

Where STL is acting as a data controller, STL may collect, use, store and transfer different kinds of personal data about you which STL has grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, gender, and passport or national identity card information;
- **Contact Data** includes postal address, email address and telephone numbers;
- **Financial Data** includes credit / debit card details or other payment information;
- **Transaction Data** includes details about payments to and from you and other details of travel services you have purchased from STL;

- **Technical Data** includes internet protocol address, browser type and versions, time zone setting and location, browser plug-in types and versions and platform and other technology on the devices you use to access our Website;
- **Profile Data** includes purchases or bookings made by you, your interests, preferences, feedback and survey responses;
- **Usage Data** includes information about how you use our Services or submit an enquiry or query through our Website;
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and Our third parties and your communication preferences;
- **Individual Data** – additional information collected from you in relation to the Services We provide;
- **Special Categories of Data** includes information relating to disabilities or medical conditions which may affect your holiday arrangements and any dietary restrictions which may disclose your religious beliefs. Special categories of data may also include ethnicity, sexual orientation or other biometric data, although it is unlikely that We will need to collect all of this type of data from you in connection with your holiday arrangements.

If you fail to provide personal data

Where STL needs to collect personal data by law, or under the terms of a contract STL has with you (or our client whom STL acts for) and you fail to provide that data when requested, STL may not be able to perform the contract it has or is trying to enter. In this case, STL may have to cancel the Services but it will notify you (or where appropriate, its client) if this is the case at the time.

How is your personal data collected?

STL uses different methods to collect personal data from and about you including through:

- **Direct interactions.** You may give us your contact information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you making a reservation or booking STL for travel Services, when We (or those travel providers for whom we act as an agent) provide your holiday or travel arrangements; or
- **Enquiries** information, when made through the Website or by email, including requests for a brochure or further information relating to the Services We offer; or
- **Participation contact** if you participate in a competition, survey or other offer that We might make available to you; or
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as contact data from providers; or
- **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. Please see Our website terms of use policy www.stlon.com/small-print for further details.
- **Telephone interaction.** We take your details during telephone calls in relation to your Identity Data, Transaction Data, Contact Data, Financial Data, Profile Data and Marketing Data.

How STL uses your personal data

STL will only use your personal data when the law allows us to, ie, if we have a legal basis for doing so, as outlined in this Policy or as notified to you at the time we collect your personal data, and for the purposes for which it was collected for, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. 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 this. Please note that we may process your personal data without your knowledge or consent, where this is required or permitted by law.

Where we act as the data controller for client contact information, we have set out below in the table 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. Please contact STL if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new client and verify your identity (where required) and to provide you with travel arrangements and our Services	(a) Identity (b) Contact (c) Financial (d) Special category data	Performance of a contract with you Consent (for use of special categories of data)
To manage Our relationship with you which will include: (a) notifying you about changes to Our terms or privacy policy (b) asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Performance of a contract with you Necessary to comply with a legal obligation Necessary for Our legitimate interests (to keep Our records updated and to study how customers use Our services)
To process and deliver the Services including: (a) Manage accounts, payments, fees and charges (b) contacting you and corresponding about your travel arrangements and our Services	(a) Identity (b) Contact (c) Financial	Performance of a contract Necessary for our legitimate interests (to recover debts due to us)
To respond to queries and enquiries	(a) Identity (b) Contact	Legitimate interests
To undertake marketing to you	(a) Identity (b) Contact (c) Marketing and Communications	Consent, unless Our legitimate interests apply and this does not adversely affect your rights as a data subject
To administer and protect Our business and this Website (including troubleshooting data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	Necessary for Our legitimate interests (for running Our business, provision of administration and IT services, network security and to prevent fraud) Necessary to comply with a legal obligation

How your personal data may be shared

Where we act as the data controller, personal data processed by STL may be shared as follows:

- with any member of the STL Group, which means STL's subsidiaries, STL's ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- where STL is under a duty to disclose your personal data to comply with any legal obligation, or to enforce or apply STL's or terms and conditions and other agreements;

- to protect the rights, property, or safety of STL, STL's client, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and for compliance with laws;
- with the authorities, Foreign and Commonwealth Office or other regulatory or official purpose, as may be appropriate for regulatory purposes; and
- with 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 Policy.

Third party travel service providers

- To fulfil your booking arrangements, appropriate personal data will be passed on to the relevant suppliers of your arrangements / any third party supplier / any other third party (including banks and/or credit card issuers) who need to process your personal data so that your holiday can be provided. The information may also be provided to government / public authorities such as customs or immigration if required by them, or as required by law.
- We will generally use other companies to help provide your travel services, including hotels, airlines, ground handlers and guides, as well as when we mail brochures and send marketing material. We only provide third parties with the personal data they require in order to deliver their services and their use is limited to the services they provide.
- If We cannot pass your personal data to the relevant suppliers, We will be unable to fulfil your booking.

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.

Many of Our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever We transfer your personal data to countries outside of the EEA to other people or companies it will be for one of the legal bases for processing your personal data as indicated above. Where We do so, We will take all steps to ensure that any country to which the personal data has been transferred has suitable protection mechanisms in place to protect personal data, including (if applicable) use of EU Model Clauses in any contract with that third party for steps to be taken to keep personal data secure.

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 only receive marketing communications from Us if you have either requested information from Us, or you have previously purchased travel arrangements from Us, and you have not opted out of receiving that marketing.

Opting out

You can opt-out of receiving marketing communications from Us at any time by contacting Us via the following methods.

1. Email Us at data@stlon.com providing your full name, address and postcode and the email address which you would have originally used.
2. Write to STL at 12-15 Hanger Green, London, W5 3EL
3. Call Our office on 020 8799 8300.

4. You can also be removed from Our email database by clicking the Unsubscribe link located in the footer of all marketing email communications from Us.

5. You can update your preferences by sending an email to data@stlon.com, or telephoning Us on 020 8799 8300.

Data security

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 employees, 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.

Other than in relation to government / public authorities (over whom We have no control), We take appropriate steps to ensure that anyone to whom We pass your personal data for any reason agrees to keep it secure, only uses it for the purposes of providing their services and does not collect any personal data from you in the course performing their services.

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.

Personal Data Retention

We will keep your information for as long as We need it for the purpose it is being processed for. For example, where you book a holiday with Us We will keep the information related to your booking, so We can fulfil the specific travel arrangements you have made and after that, We will keep the information for a period which enables Us to handle or respond to any complaints, queries or concerns relating to the booking. The information may also be retained so that We can continue to improve your experience with Us, this will usually be no longer than 7 years after you have travelled with Us.

We will actively review the information We hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or customer need for it to be retained.

Your Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- The right to be informed – this is information on for what purpose we are processing it and what personal data we are processing.
- The right of access – you have the right to be provided with copies of the personal data of you that we are processing as well as confirmation of the processing we are doing. You can do this by sending a “subject access request” to the contact details noted above for our consideration.
- The right to rectification – if you think the personal data that we hold on you is wrong you can tell us and we will fix it.
- The right to erasure (also known as the right to be forgotten) – if you want us to permanently delete the personal data we hold for you then you can ask us to do so.
- The right to restrict processing – if you do not like how we are using your personal data then you can let us know and we will stop processing it in that way.
- The right to data portability – if you want us to pass on your personal data to someone else then please let us know. This transfer should not affect the integrity or otherwise damage your personal data.
- The right to withdraw your consent – you can withdraw your consent for us to process your personal data (if we have relied on your consent to process your personal data) at any time by contacting us. If we have relied only on your consent as the basis to process your personal data

then we will stop processing your personal data at the point you withdraw your consent. Please note that if we can also rely on other bases to process your personal data aside from consent then we may do so even if you have withdrawn your consent.

- Rights in relation to automated decision making and profiling – if we use either automated decision making or profiling then you have a right to know. Also, we need your consent if either of these are used to make a decision that affects you. As with all consent, you can withdraw it at any time.

To exercise any of the above rights please email your request to: data@stlon.com.

Where you exercise your right to erasure or where information is deleted in accordance with STL's retention policy, please note that after the deletion of your personal data, it cannot be recovered, so if you require a copy of this personal data, please request this during the period STL retains the data.

Where you exercise your right to request access to the information STL processes about you, you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

STL will try to respond to all legitimate access 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.

If you believe that any of your personal data which We are processing is inaccurate or incorrect please contact Us by calling Our office on 020 8799 8300, by emailing data@stlon.com, or by writing to STL, 12-15 Hanger Green, London, W5 3EL.

Children

The Website is not intended for children and STL will not knowingly collect any personal data from persons under the age of 18. Where, as part of the Services being provided and travel arrangements being put in place, We may collect information about children from you to perform such Services and We will treat such information securely.

Complaints

If you would like to make a complaint in relation to how STL may have stored, used or processed your personal data, 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 (www.ico.org.uk). STL would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

External Websites

The Website may, from time to time, contain links to and from the websites of STL partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. STL is not responsible for the content of external internet sites and you are advised to read the privacy policy of external sites before disclosing any personal data.

Remember the Risks Whenever You Use the Internet

STL is committed to ensuring that your information is secure and has in place reasonable and proportionate safeguards and procedures to protect your personal data. Whilst STL does its best to protect your personal data, STL cannot guarantee the security of any information that you transmit to STL and you are solely responsible for maintaining the secrecy of any passwords or other account information.

Changes to this Privacy Policy and your duty to inform us of changes

As and when necessary, changes to this Privacy Policy will be posted here. Where changes are significant, we may also email all our registered users with the new details, and where required by law, we will obtain your consent to these changes.

This Privacy Policy was last updated on 11 May 2018.