

PRIVACY NOTICE INTRODUCTION

WELCOME TO REED & MACKAY'S PRIVACY NOTICE

Reed & Mackay respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website or use our technology or services (regardless of where you visit them from) and tell you about your privacy rights and how the law protects you. Please note that if you work for, or your travel is being sponsored by, an organisation that is a client of Reed & Mackay and you provide us with personal data in connection with that engagement, Reed & Mackay will process your personal data on behalf of your employer or travel sponsor. Please further note that if travel or associated services are purchased for you pursuant to an arrangement between your employer or travel sponsor and Reed & Mackay then, due to Reed & Mackay's status as an agent, the relevant Service Provider (as defined below) will be responsible for the security of the personal data it receives and for compliance with applicable law; Reed & Mackay is not responsible for the acts or omissions of such Service Providers.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE - This privacy notice aims to give you information on how Reed & Mackay collects and processes your personal data, including any data you may provide through your employer or travel sponsor. This website or use of our technology or services is not intended for children and we do not knowingly collect data relating to children. It is important that you read this privacy notice together with any other privacy 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 other applicable notices including but not limited to our cookies policy and is not intended to override them.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES - We keep our privacy notice under regular review. This version was last updated in September 2021. 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.

THIRD-PARTY LINKS - Our website or use of our technology or services may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third parties and are not responsible for their privacy statements. When you leave our website or discontinue use of our technology or services, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT 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 title, first name, middle name, surname, gender, date and place of birth, country of residence, nationality, marital status, destinations and locations on trip.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **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 travel bookings made by you, your interests, feedback and survey responses.
- **Travel Data** includes
 - **Passport** - passport country, issue country, passport number, forename, middle names, surname, date of issue, date of expiry, biometric (Y/N)

- Visa (inc. ESTA, Redress, Schengen, Work Permit, Global Entry) - visa county, issue country, type of visa, document number, issue date and date of expiry
- TSA - TSA number, start date, expiry date
- Driving Licences - country, licence number, forename, middle name, surname, start date, expiry date, provisional (Y/N), international (Y/N)
- ID Cards - country, ID card number, forename, middle name, surname, start date, expiry date
- Travel Preferences (inc. air, car, rail, Eurostar, hotel, accessibility requirements for trip) - seat type, seat allocation, meal preferences, home airport, online check-in preference, transmission, fuel/aircon, satnav (Y/N), coach number, room type, smoking/non-smoking
- Vaccine and Covid-19 testing information as required for bookings
- Memberships - loyalty cards - service type, supplier, membership number, date of expiry, status, level
- **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.
- We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your travel Data for Management Information Reports. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

HOW IS YOUR PERSONAL DATA COLLECTED? We use different methods to collect data from and about you including through:

- **Direct interactions.** Your employer or your travel sponsor or you may give us the data above by filling in forms electronically or by corresponding with us by post, phone (calls may be recorded), email or otherwise.
- **Automated technologies or interactions.** As you interact with our websites, we may automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive **Technical Data** about you if you visit other websites employing our cookies. 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 analytics providers such as Google and Pardot; and
 - **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register based inside the EU.

3. HOW WE USE YOUR PERSONAL DATA

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 have entered into with you, your employer or your travel sponsor.
- 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 DATA - We have set out below, in a table format, a description of all the ways we may use your personal data (whether on our own behalf or acting on behalf of your employer or travel sponsor), 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 us 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 traveller or event delegate and build your profile.	a) Identity b) Contact c) Profile	Performance of a contract with your employer or travel sponsor
To process and deliver your travel and events requirements. a) Manage bookings, refunds, payments, fees and charges b) Collect and recover money owed to us	a) Identity b) Contact c) Financial d) Transaction e) Profile f) Travel	a) Performance of a contract with your employer or travel sponsor b) Necessary for our legitimate interests (to recover debts due to us)
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	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 customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications	a) Performance of a contract with you b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
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	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) 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 use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a) Technical b) Usage	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)
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	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 - You may 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 or you have downloaded a promotion and, in each case, you have not opted out of receiving that marketing. We may use third parties from time to time in connection with our advertising.

THIRD-PARTY MARKETING - We would get your express opt-in consent before we share your personal data with any company outside the Reed & Mackay Group of companies for marketing purposes.

OPTING OUT - 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 can ask us or third parties to stop sending you marketing messages at any time by getting in touch with us at marketing@reedmackay.com or writing to us at the following address:

Marketing Department
Nexus Place
25 Farringdon Street
London EC4A 4AF

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, interest, warranty registration, product/service experience or other transactions.

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 our websites or technology may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy.

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 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.

4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 3 above.

Service Providers means any third party with whom Reed & Mackay interacts in its capacity as your authorised agent pursuant to your contract, including any third party that:

- provides travel services and to whom Reed & Mackay makes bookings on your behalf, including airlines, hotels, and airport transfer or taxi services;
- facilitates or processes bookings (whether electronically or otherwise) made by Reed & Mackay on your behalf for travel services, including on-line booking tools or other software and travel agents; or
- processes applications to assist or enhance a person's ability to receive the benefit of the Services, including passport and visa agencies, currency convertors and other similar agencies

Service Providers are generally controllers of data and so any data transfer to a Service Provider is between Service Provider as data controller and employer/travel sponsor as data controller. Reed & Mackay always acts in these circumstances as data processor on your behalf.

Where we sub-contract services to third parties (sub-processors) we require all such third parties to respect the security of your personal data and to treat it in accordance with the law. In such circumstances we do not allow our third-party suppliers 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. Please note that if travel or associated services are purchased for you pursuant to an arrangement between your employer or travel sponsor and Reed & Mackay then, due to Reed & Mackay's status as an agent, the relevant service provider will be responsible for the security of the personal data it receives and for compliance with applicable law; Reed & Mackay is not responsible for the acts or omissions of such service providers.

5. INTERNATIONAL TRANSFERS

We share your personal data within the Reed & Mackay Group, with our local TMC Partners and with third party sub-processors. This will involve transferring your data outside the UK and the European Economic Area (EEA).

Whenever we transfer your personal data to these parties outside of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Where we use certain third parties, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.

As a Corporate travel services agent many of the Service Providers are based outside the UK and the European Economic Area (EEA) so their processing of your personal data will also involve a transfer of data outside the UK and the EEA.

We comply with the recent *Schrems II* by following the EDPB Guidance - Mapping all transfers of personal data to Third Countries, including any transfers to our sub processors; using the transfer tool of Standard Contractual Clauses with additional supplementary measures as needed with our sub-processors who store and process data in the US and other third countries; using appropriate encryption tools.

6. DATA SECURITY

Reed & Mackay operates a global business and client personal information may be shared with our international entities as set out in paragraphs 4 and 5 above. However, we store all client personal data in the UK.

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.

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.

Specifically, client personal data held in profiles and travel bookings/history is retained for the duration of the contract with the client organisation unless otherwise instructed by that organisation.

Requests to remove profiles may come as part of the regular or one-off automatic profile maintenance feeds provided by some clients; may be requested through the portal; or via travel consultants who have the ability to delete profiles.

Management Information (MI) data, which would include travel details (including traveller names but not passport etc.), is retained for a period of 5 years (rolling) irrespective of the currency of the client's contract (i.e. this data will exist for 5 years beyond the last travel date).

Similarly, Transaction History, which would include travel details (including traveller names but not passport etc.), is retained for a minimum of 7 years to comply with legal obligations.

Call recordings are retained for 3 months.

Personal data that is no longer required is deleted permanently from information systems and any hard copies destroyed securely.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being customers for tax purposes.

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 LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to information held on electronic media which you initially provided us in order to perform a contract with your employer or travel sponsor.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at privacy@reedmackay.com.

NO FEE USUALLY REQUIRED - 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.

WHAT WE MAY NEED FROM YOU - We may need to request specific information from you or your employer or travel sponsor to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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.

8. FURTHER INFORMATION

If you have any questions about how we process your personal information, please contact privacy@reedmackay.com. We hope that we will be able to address any questions or concerns you may have. However, you also 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 by calling their helpline on 0303 123 1113.