

PRIVACY NOTICE INTRODUCTION

WELCOME TO REED & MACKAY'S PRIVACY NOTICE

Reed & Mackay respects the right to privacy and is committed to protecting Personal Data. This privacy notice sets out the purposes for which we process Personal Data, how we look after your Personal Data processed through our website or use of our technology or services and the rights of individuals with regards to Personal Data.

1. IMPORTANT INFORMATION AND WHO WE ARE

If travel is being sponsored by an organisation that is contracted for services from Reed & Mackay ("Client"), Reed & Mackay will process Personal Data provided by and on behalf of the Client in order to facilitate the provision of this service. This relationship is subject to a written contract between Reed & Mackay and the Client which forms the basis for the processing of Personal Data carried out by Reed & Mackay. Under these circumstances, the Controller is the Client and Reed & Mackay operates as the Processor. Travellers or event delegates may also need to provide us with Personal Data directly in connection with that engagement. It is important that the Personal Data we hold is accurate and current. We rely on the Controller to ensure data provided to us is accurate and current.

Travel and associated services are purchased pursuant to an arrangement between the Client and Reed & Mackay whereby Reed & Mackay acts as an agent and, as such, 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. See Disclosures of Personal Data, paragraph 4 below, for further information.

There are circumstances where Reed & Mackay may on occasion also be a Controller. These are specific to Reed & Mackay's capacity as an employer, or for the purposes of client communications and service improvement (see further below).

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 Personal Data. We do not control these third parties and are not responsible for how they process Personal Data.

2. THE DATA WE PROCESS

Personal Data, or personal information, means any information about an individual from which that person can be identified.

We may process, on behalf of the Controller, different kinds of Personal Data which we have grouped together as follows:

Category of Personal Data	Types of data included
Contact Data	<ul style="list-style-type: none"> Title, first name, surname, billing address, delivery address, email address and telephone numbers.
Financial and Transactional Data	<ul style="list-style-type: none"> Bank account and payment details Details of travel and event bookings, products and services purchased Destinations, locations and itineraries of travel or event
Technical and Usage Data	<ul style="list-style-type: none"> Internet protocol (IP) address, 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 used to access this website, cookies. Information about how the website, products and services are used.
Traveller Profile Data	<ul style="list-style-type: none"> Identity - title, first name, middle name, surname, gender, date and place of birth, country of residence, nationality, marital status 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 country, 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 Payment card details
Communications Data	<ul style="list-style-type: none"> Communication preferences from us and our third parties, feedback and survey responses

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data may be derived from Personal Data but is not considered Personal Data in law as this data has been anonymised and cannot directly or indirectly reveal an identity. For example, we may aggregate travel data for Management Information reports.

HOW IS PERSONAL DATA COLLECTED?

We use different methods to collect data including through:

Method of collection	Description
Direct interactions	The Controller or data subject may give us the data above electronically or by corresponding with us by post, phone (calls may be recorded), email or otherwise.
Automated technologies or interactions	Through interactions with our websites, we may automatically collect Technical and Usage Data about equipment, browsing actions and patterns. We collect this Personal Data by using cookies, and other similar technologies. Please see our cookie policy for further details.
Third parties or publicly available sources	We may receive data identifying client organisations from various third parties, such as analytics from Google and Pardot, and public sources.

3. HOW WE USE PERSONAL DATA

We will only use Personal Data when the law allows us to. Most commonly, we will use Personal Data as required to provide travel and travel related services to Clients, which is governed by a written contract between ourselves and our Clients. Additionally, we may process Personal Data in the following circumstances, for particular purposes:

- Where it is necessary for our legitimate interests (or those of a third party) and personal 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 PERSONAL DATA

We have set out below a description of all the ways we may use Personal Data (whether on our own behalf or acting on behalf of the employer or travel sponsor (our Client)), and which lawful basis we rely on to do so, where applicable. We have also identified what our legitimate interests are where appropriate. Note that we may process Personal Data for more than one lawful basis depending on the specific purpose for which we are using the Personal Data. Please contact us for further details about the specific lawful basis we are relying on to process Personal Data where more than one ground has been set out in the table below.

PURPOSE/ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING
In our capacity as Processor		
To register new travellers or event delegates and build the necessary profiles.	a) Contact b) Traveller Profile	This is required to provide travel, events and related services required by our Client. This is governed by instruction through a written contract with Reed & Mackay, as a Processor.
To process and deliver travel and events requirements. a) Manage bookings, refunds, payments, fees and charges b) Collect and recover money owed to us	a) Traveller Profile b) Contact c) Financial and Transactional	This is required to provide travel, events and related services required by our Client. This is governed by instruction through a written contract with Reed & Mackay, as a Processor.
To manage our Client relationships which will include: a) Notifications about changes e.g. to our terms, products and services, privacy policy etc. b) Asking for reviews or survey participation.	a) Financial and Transactional b) Contact c) Traveller Profile d) Communications	This is required to provide travel, events and related services required by our Client. This is governed by instruction through a written contract with Reed & Mackay, as a Processor.
In our capacity as Controller		
To administer, protect and improve our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Contact b) Technical and Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, and develop our business)
To deliver relevant website content and communications, and measure or understand the effectiveness of the communications we serve	a) Contact b) Technical and Usage c) Communications	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our communications strategy)

MARKETING - Prospective clients and leads may receive marketing communications from us, only where they have opted-in to this form of communication.

OPTING OUT - Generally, we do not rely on consent as a legal basis for processing Personal Data other than in prospect or lead marketing. To ask us or our third parties who support us in this marketing to stop sending marketing messages at any time, get in touch with us at marketing@reedmackay.com or by writing to us at the following address:

Marketing Department
Nexus Place
25 Farringdon Street
London EC4A 4AF

When exercising this opt-out to 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 - Browser settings can refuse all or some browser cookies, or provide alerts when websites set or access cookies. If cookies are disabled or refused, please note that some parts of our websites or technology may become inaccessible or not fully functional. For more information about the cookies we use, please see our cookies policy.

CHANGE OF PURPOSE - We will only use Personal Data for the purposes for which we collected it, as listed above. Any further processing will only be where reasonably perceived to be compatible with the initial purpose.

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

4. DISCLOSURES OF PERSONAL DATA

We will have to share Personal Data with the parties set out below to support 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 a Client's authorised agent pursuant to contract, including any third party that:

- provides travel services and to whom Reed & Mackay makes bookings on the Client's behalf, including airlines, hotels, rail and other ground transport;
- facilitates or processes bookings (whether electronically or otherwise) made by Reed & Mackay on the Client's 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, travel information services 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 Controller and Client as Controller. Reed & Mackay always acts in these circumstances as Processor on the Controller's behalf. Please note that if travel or associated services are purchased pursuant to an arrangement between the Client (the 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.

Where we sub-contract services to **third parties (sub-processors)** we require all such third parties to respect the security of Personal Data and to treat it in accordance with the law. In such circumstances we do not allow our third-party suppliers to use Personal Data for their own purposes and only permit them to process Personal Data for specified purposes and in accordance with our instructions.

5. INTERNATIONAL TRANSFERS

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

We ensure a similar degree of protection is afforded to all Personal Data by ensuring at least one of the following safeguards is implemented:

- We will only transfer 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.
- We comply with *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 or the UK International Data Transfer Agreement (or Addendum) 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.

In addition, as a Corporate travel services agent we transfer Personal Data to Service Providers, many of whom are based outside the UK and the European Economic Area (EEA).

6. DATA SECURITY

Reed & Mackay operates a global business and client personal information may be processed by 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 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 Personal Data on our instruction, 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 Clients and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

HOW LONG WILL PERSONAL DATA BE PROCESSED? - We will only retain Personal Data for as long as is necessary to fulfil the purpose for which it was processed, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate measures for retention 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 Personal Data, and the purposes for which we process Personal Data.

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, Financial and Transactional Data) for 7 years after they cease being customers for tax purposes.

In some circumstances we may anonymise Personal Data (so that it can no longer be associated with an individual) for research or statistical purposes in which case we may use this information indefinitely without further notice.

8. LEGAL RIGHTS

Under certain circumstances, individuals have rights under data protection laws in relation to Personal Data.

Individuals have the right to:

Request access to Personal Data (commonly known as a "data subject access request"). This enables individuals to receive a copy of the Personal Data held about them and to check that it is lawfully processed.

Request correction of the Personal Data that we hold about an individual. This enables individuals to have any incomplete or inaccurate data we hold about them corrected, though we may need to verify the accuracy of the new data provided to us.

Request erasure of Personal Data. This enables individuals to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. Individuals also have the right to ask us to delete or remove their Personal Data where they have successfully exercised their right to object to processing (see below), where we may have processed their information unlawfully or where we are required to erase their Personal Data to comply with local law. Note, however, that we may not always be able to comply with the request of erasure for specific legal reasons which will be notified to the requestor, if applicable, at the time of the request.

Object to processing of Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about the individual's particular situation which makes them want to object to processing on this ground as they feel it impacts on their fundamental rights and freedoms. They also have the right to object where we are processing their Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process the information which override the individual's rights and freedoms.

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

Request the transfer of their Personal Data to themselves or to a third party. We will provide to then individual, or a third party chosen, the Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to information held on electronic media which was initially provided to us in order to perform a contract with the employer or travel sponsor.

Withdraw consent at any time where we are relying on consent to process Personal Data. However, this will not affect the lawfulness of any processing carried out before withdrawal of consent. If consent is withdrawn, we may not be able to provide certain services. We will advise if this is the case at the time consent is withdrawn.

Please note, Clients and individuals are able to update or delete certain Personal Data items included in their profile through an interface from a Client's HR system; through direct access to their profile; or via a travel consultant / agent. Where this is not possible or applicable, or an individual wishes to exercise any of the other rights set out above, please contact us at privacy@reedmackay.com. In capacities where we process your Personal Data as Processor (as described in paragraph 3 above), on behalf of our Client, the Controller, we will notify the Controller of the request without undue delay and support them in responding to it.

NO FEE USUALLY REQUIRED - Individuals will not have to pay a fee to access their Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if the request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

WHAT WE MAY NEED - We may need to request specific information the individual or the employer or travel sponsor to help us confirm the individual's identity and ensure their right to access the Personal Data (or to exercise any of the 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 ask for further information in relation to the request to speed up our response.

TIME LIMIT TO RESPOND - We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if the request is particularly complex or a number of requests have been made. In this case, we will notify requestors of this and keep them updated.

8. FURTHER INFORMATION

Please direct any questions about how we process personal information to privacy@reedmackay.com. We hope that we will be able to address any questions or concerns. However, individuals 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.