

PRIVACY NOTICE INTRODUCTION

WELCOME TO REED AND MACKAY'S PRIVACY NOTICE

Reed and 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 (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. Please note that if you work for 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 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 and Mackay collects and processes your personal data through your use of our websites, including any data you may provide through your employer or travel sponsor. This website 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 or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES - This version was last updated in May 2018. The data protection law in the UK will change on 25 May 2018. 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 - This website 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-party websites and are not responsible for their privacy statements. When you leave our website, 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 follows:

- **Identity Data** includes full name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Travel Data** includes passport number
- **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, meal preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 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.

We do collect **Special Categories of Personal Data** about you (this includes details about your health and religion for meal preference).

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 your Identity, Contact and Financial Data by filling in forms electronically or by corresponding with us by post, phone, 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 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.

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 DATA - We have set out below, in a table format, a description of all the ways we plan to 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 and build your profile.	Name, email address, phone numbers, employer, and physical addresses, passport number, gender and date of birth. If we book travel for your travel companions, we may collect similar information about them. You may choose to provide additional information when setting up your traveller profile which may include request traveller credentials, and emergency contact information.	Performance of a contract with your employer or travel sponsor
To process and deliver your travel (a)Manage payments, fees and charges (b)Collect and recover money owed to us	As well as the above we also collect payment card information and details necessary to process these payments.	(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. We have established a privacy centre where you can view and make certain decisions about your personal data use. This will be live in June, in the meantime please contact marketing@reedmackay.com.

PROMOTIONAL OFFERS FROM US - 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 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 will get your express opt-in consent before we share your personal data with any company outside the Reed and Mackay Group of companies for marketing purposes.

OPTING OUT - You can ask us or third parties to stop sending you marketing messages at any time entering onto the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see the cookie 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 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.

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 4 above.

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

- provides travel services and to whom R&M makes bookings on your behalf, including airlines, hotels, and airport transfer or taxi services;
- facilitates or processes bookings (whether electronically or otherwise) made by R&M 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
- 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.

Where we sub-contract services to third party service providers 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 and Mackay's Group, its local TMC Partners and to Services Providers. This will involve transferring your data outside the European Economic Area (EEA).

As a Corporate travel services agent many of the Service Providers 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 out of 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. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#). Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

6. 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.

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 emailing grc@reedmackay.com. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes. 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 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 automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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 GRC@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 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 GRC@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.