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# DISTINCTIVE WORLD TRAVEL PRIVACY POLICY

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## **DISTINCTIVE WORLD TRAVEL PRIVACY POLICY**

### **Introduction**

We work very hard to keep the information you give us, or our agency partners, safe. We follow strict security procedures on how your personal information is stored and used, and who sees it, to help stop any unauthorised person getting hold of it.

### **What is Personal Information and why do we keep it**

Personal information or data is any piece of information that concerns you as an individual, such as names, email addresses, telephone numbers etc. As part of our service in providing you with a quotation or holiday booking we are required to gather, store, share and destroy some of your personal data.

The specific data required for each stage and why is detailed in subsequent sections. All personal data is stored securely on a Microsoft Cloud based system. This cloud based system includes a range of security measures and encryptions, including passwords and firewalls. Our computers are protected by firewalls and anti virus software, and can only be accessed by first inputting a password. These passwords are changed regularly. Our systems are regularly backed up.

Data is only stored for the duration necessary to carry out your requirements – whether that be a quote or a booking.

In order to complete your request for either a quotation or a booking we will need to share this information with 3<sup>rd</sup> parties such as ground handlers (outside of the EU), airlines and flight consolidators. We only work with companies that ensure the highest standard of data security and ensure even those outside of the EU are made aware of, and adhere to Data Protection and Security guidelines.

### **What Personal Information we collect for quotations**

The information required to complete a quotation is minimal, we need only names and sometimes, in the case of children, ages and dates of birth. This information will be taken either directly from you or via our agency partners.

If you can to us as a direct client we will also need to store the following:

- Email address
- Address
- Phone number

We will ensure this data is stored securely and deleted once it is no longer required (after 3 months of receipt of the last communication with you or our agency partner).

### **What Personal Information we collect in order to complete a booking**

Bookings require more information, once again this information may be given to us by you or by our agency partners. This information includes the following:

- Names (full names as per passport)
- Dates of birth
- Age
- Address, telephone number and email address
- Passport number
- Any health conditions that could affect your holiday
- Any allergies
- Airline club number (i.e. frequent flyer numbers)

This information will be stored for a maximum of 1 month after your return from your holiday, unless we receive a complaint or you require our assistance in resolving an issue i.e. hire car charges, cancellation fees, insurance claims etc. In this case we would seek your approval to continue to store your data and inform you once we have removed it from our systems.

We will keep data on names, booking reference number, holiday destination, holiday cost and payments received for accounting purposes. This information will be kept for 6 years.

#### **Data collected for reviews from survey forms**

When you travel with us we will send you a survey form, asking you how you felt on all aspects of your holiday with us. The only personal data on this form will be your surname and booking reference number – as well as any comments you make. On receipt of this form we scan the forms, sending to our agent partner where necessary, and then file the form. We use the information on this form to compile statistics which are then passed to AITO. These forms are kept in paper and electronic form for up to 6 years.

At the bottom of the form there is a tick box which you can select if you do NOT wish for your comments to be used as reviews in marketing material, including on the website. If you do NOT select this box, we may use your comments with your surname only. These comments will be kept for a maximum of 6 years.

#### **Data we collect from brochure requests, information requests**

We collect personal details, such as your name, address and email address only when you use our website or email is with an enquiry, order a brochure, register with us for competitions, promotions or sign up to receive email newsletters from us.

We will only use that information to respond to your message and to help us get you the information or services you have requested. Remember that email is not necessarily secure. You should never send sensitive or personal information by email.

#### **Information Collected via Cookies**

We use "cookies" on our website. Cookies are small files placed on your computer's hard drive, or in your browser memory, when you visit our website. Your computer will only share the information in the cookie with the website that provided it, and no other website can request it.

There are two types of cookies, session and persistent. Session cookies last only as long as your web browser is open. Once you close your browser, the cookie disappears. Persistent cookies store information on your computer for longer periods of time - typically up to 3 months. Our websites may use both types of cookies.

At no time is your private information, whether stored in persistent cookies or elsewhere, shared with third parties who have no right to that information. We at no time use the information from cookies.

If you do not wish to have session or persistent cookies stored on your machine, you can turn them off in your browser.

#### **Telephone Calls**

We never record phone calls.

#### **Withdrawing consent**

We are not required to seek explicit consent from you to store data in order to carry out the services we provide. However, where consent is necessary, you always have the option to withdraw consent. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

**What rights do I have?**

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us– or, as appropriate, our data protection officer – using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office.

Much of the information listed above is required in order for us to be able to carry out your required service. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided however, we may not be able to provide you with appropriate assistance, services or support.

**How do I get in touch with Distinctive World Travel, Distinctive Americas or Distinctive Africa?**

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, or would like to opt out of direct marketing, you can get in touch at with our appointed person.

daniel@distinctiveamericas.com  
or  
by writing to Distinctive World Travel  
Unit 1 Compton Business Centre, Compton Abdale, Cheltenham, Gloucestershire, GL54 4DL

**How long will you retain my data?**

Information gathered for a quotation will be kept while the enquiry is 'live' or active plus 3 months from our last communication with you or our agency partner, or until you or our agency partner instruct us that the enquiry is no longer live.

Information gathered for a booking will be stored for the duration of the booking, i.e. until you return from your holiday plus 1 month, unless we receive a complaint, or you require our assistance is resolving an issue i.e. hire car charges, cancellation fees, insurance claims etc. In this case we would keep your information for the duration of the enquiry, complaint etc + 1 month.

Where we process personal data for marketing purposes or with your consent, we process the data for 6 years unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.

**What happens if there is a Data Breach?**

We make every effort to keep your personal data safe. If, however, there is a breach we have a strategy in place.

A data breach is when data has been accessed by an individual and or company not authorised to do so. We will notify you should the data breach involve any personal data of yours.

We will log all forms of data breaches in a Data Breach Register, this will include breaches that do not include personal information. Any breaches that involve personal data will be reported to the ICO where applicable.