

# Privacy Policy – Knowle Travel Ltd / Midland Cruise Club Ltd

Knowle Travel Ltd / Midland Cruise Club Ltd takes personal data privacy very seriously. We act in accordance within the laws of the United Kingdom. Our data privacy policy and procedures have been updated to comply with the General Data Protection Regulation (GDPR) 25<sup>th</sup> May 2018.

We collect and store one or more of the following data when you make a request for information, a quotation, or supply of a brochure; or when you confirm a booking with us:

Name, email address, telephone number and full postal address and any email preferences you may have chosen to provide, and this information will be stored in secure locations.

We do not store customer credit card numbers or any other payment information other than invoices, statements and confirmation of payments.

## OPT-IN POLICY FOR EMAIL INFORMATION

Personal data is captured in circumstances of legitimate interest, e.g. when enquiries, quotations and brochures are requested via our website. We feature "opt-in" boxes where personal information (name and email address) is required for the purpose of supplying information to you such as special offers, holiday updates, and news on product launches etc. by email.

Upon submitting an enquiry, quotation or brochure request via our website, you will be sent an email asking for you to "opt-in", you will not be added to our email list until you have fully followed the "double opt-in" process.

You can opt out from our email marketing database at any time by clicking on the **unsubscribe** button which is featured at the bottom of any marketing email we send you.

We use a specialist third party email platform (including, but not limited to, Mailchimp) to deliver marketing emails. We do not share your information with any other third parties, unless you agree for us to do so in relation to any holiday request/ booking you have made with Knowle Travel / Midland Cruise Club Ltd.

## SUBJECT ACCESS REQUEST (SAR)

If you wish to request a copy of the personal data we have stored on our system relating to you, please email your request to [info@knowletravel.co.uk](mailto:info@knowletravel.co.uk). You must email your request using the exact email address your request relates to. We will undertake your request within 30 days of submission.

## OTHER DATA PRIVACY INFORMATION

Clicking on any external links or banner advertisements on our website will result in you being transferred to another website, where data privacy practices may be different to those of Knowle Travel Ltd / Midland Cruise Club Ltd. Once transferred from our website to another, we cannot be held responsible for how your data is collected and stored by third parties.

As we strive to provide you with the most responsible data privacy policy and be fully compliant with the new GDPR law, we reserve the right to update this privacy policy page at any time.

## RIGHT TO BE FORGOTTEN

If you wish to have all your data deleted (name, email address, postal address, telephone number and any email preferences), please email your request to: [info@knowletravel.co.uk](mailto:info@knowletravel.co.uk).

You must email your request using the exact email address your request relates to.

We will respond to such requests within 30 days of receipt of your email. There may be occasions however when we may be required by law to store this data for a certain period of time beyond your request to comply with financial services regulations. We will advise you of any necessary extensions we are legally obliged to adhere to when responding to your request.

## DATA BREACH & NOTIFICATION

In the unlikely event of any data breach, we will notify the appropriate supervisory authority within 72 hours of discovering the breach.

In the unlikely event of such a data breach resulting in a high risk to the rights and freedoms of individuals, we will notify those individuals wherever feasible within 72 hours of discovering the breach.

Any queries or complaints relating to our data protection policy, should be directed to our Data Protection Officer via email: [info@knowletravel.co.uk](mailto:info@knowletravel.co.uk). We will aim to respond to any requests within 5 working days of receipt.

## **HOW LONG DO WE KEEP YOUR DATA FOR?**

Personal data that we process via this website for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain your personal data as follows:

- (a) Personal data supplied for the purposes of a holiday enquiry or quote will be retained for a minimum period relating to the valid date of a quote and for a maximum period of the length of our business relationship.
- (b) Data supplied for the purposes of general enquiries will be kept until the enquiry has been satisfactorily answered.
- (c) Personal details attached to your booking will remain on our booking system invoices and be retained in accordance with the law relating to income tax and audit purposes. We do not retain any payment card details.

## **HOW DO WE KEEP YOUR DATA SAFE?**

No system is guaranteed 100% secure but we have taken the appropriate precautions to safeguard your data wherever possible.

- Our website is protected by an SSL encryption certificate to create a secure link between our website and your browser protecting your information from hackers.
- Our Website is hosted on highly secure UK data servers with dedicated firewall protection.
- We only use GDPR compliant third party service processors for helping us to manage tasks (such as sending you mailings). We disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.
- Enquiries made via our holiday search or offers pages are processed securely by third party software hosted on highly secure UK data servers.
- We store your personal details securely on our CRM software hosted on UK servers
- We have taken all reasonable steps and have in place appropriate security measures to protect your information. All staff are trained in our Data Protection Policies and we use security measures such as password protected access to our in-house computer systems, data sharing agreements with joint controllers e.g. Tour Operators and processing contracts with our software providers.
- We store your personal details securely on our CRM software hosted on UK servers and protected by password access.

## **DO WE TRANSFER YOUR PERSONAL INFORMATION OUTSIDE THE EEA AND WHAT SAFEGUARDS ARE IN PLACE?**

Our website uses an expert third party processor called Sendgrid to securely deliver your website enquiries to us. Your information will be processed via their servers located in the US and secured in line with GDPR requirements under their EU-US Privacy Shield Framework. A processor agreement is in place to protect the privacy of your data.

As a travel company it is sometimes necessary for us (or our suppliers) to send your data to countries outside the EEA and outside the EC list of countries deemed to have adequate levels of Data Protection for international transfers of data in order to fulfil your booking. Please ask if you have any concerns.

We use GDPR compliant software hosted on US servers to send our email marketing communications. We disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. You can find their Privacy Policy here [Mailchimp Privacy Policy](#)

Midland Cruise Club Ltd is part of the Knowle Travel Ltd group of companies.

Updated - 25 May 2018