

# Visumo Travel Ltd Privacy Policy 2018

## Introduction

Welcome to the Visumo Travel Limited privacy notice. This notice is provided in a layered format as per below:

1. **Privacy Policy Purpose**
2. **The Data We Collect About You and How it is Collected**
3. **How We Use Your Personal Data**
4. **Disclosures of Your Personal Data**
5. **Information and Data Security**
6. **Data Retention**
7. **Your Consent**
8. **Your Legal Rights**
9. **Amendments**

## 1. PURPOSE OF THIS PRIVACY POLICY

Visumo respects your privacy and is committed to protecting your personal data.

This privacy notice will inform you as to how we use, retain and look after the information and personal data of our clients, suppliers and contacts and tell you about your privacy rights and how the law protects to you.

## 2. WHAT INFORMATION DO WE COLLECT?

We collect information that you supply to us when writing to us, emailing us or speaking to our staff in person or over the telephone.

Visumo Travel or FLAIS - our product brand - will also not collect data about you without your consent, and we do not use your personal data for any reason not directly or indirectly related to providing our core services. We only keep client information which is relevant to past or future enquiries and bookings or for the registration for any of our catalogues or your expressed interest in set promotional material.

We will not misuse or trade your data with any third party unless we have your consent to do so, or we are required to do so by law. The data we hold will be kept securely in line with our company policies and with British and European law.

We only hold information relevant to the services we provide, including:

- Name, address, contact information including phone and email details
- Information you have provided to us in order to quote or book holidays or events on your behalf, including passport and nationality information, dietary requirements and medical needs relevant to services we provide.
- We will never keep on file information such as credit card numbers, bank details or financial information.

## Cookies on Visumo Travel.com

The Visumo Travel website uses cookies. A cookie is a small amount of data which is sent to your browser and downloaded on your computer when you visit a website. Cookies help the website to work better and to improve the visitor experience. They keep a record of your preferences on a website enable use of its features. Our website also uses Google Analytics, which tracks users anonymously, and does not store information of a sensitive or personally identifiable nature.

By using the Visumo Travel website, you imply consent to the use of cookies. You can accept or decline cookies at any time by reconfiguring your browser to reject third party cookies.

## 3. DISCLOSURE - HOW DO WE USE YOUR PERSONAL DATA?

We use the information you submit to us for the following purposes:

- Organising holidays and events, excursions and parties; providing travel services
- Accounting for auditing and tax.
- We may contact you occasionally to let you know about catalogues, services or destinations which may be of interest to you. We may send you an occasional personal message by post or email. We will not send irrelevant or unwanted promotional emails.

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## 4. HOW INFORMATION WE HOLD IS SHARED

To offer travel services and to respond to our booking requests we may need to pass some of your information to carefully chosen, reputable partners. These include hotels, airlines, transfer companies, tour operator partners, guides, restaurants and other companies we work with in order to plan travel and events.

Airlines and transport companies may be required to collect personal data, and we may pass on information such as passport details in order to make arrangements overseas work more smoothly, for example completing flight bookings or checking clients in at hotels.

Although we do our utmost to ensure that third parties comply with relevant data protection legislation, we cannot be held responsible for any security failures or breaches by third parties. Information shared with Visumo Travel may be stored or processed outside the EEA (European Economic Area) by organisations working for us or our partners who may not be governed by the same privacy laws we follow. We will take all reasonable measures to be sure your data is kept secure and confidential by any organisations with which we cooperate.

**Other Websites and Links:** This privacy policy applies to our website, and not to any other website that might be accessed through links on our site. Please consult the privacy page of those sites for relevant information.

## 5. INFORMATION AND DATA SECURITY

We are committed to protecting the security of personal data which we hold. We have in place IT processes, a secure software system and physical security measures in order to keep physical and electronic records safe.

## 6. DATA RETENTION

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.

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 within the **Your Legal Rights** section 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 without further notice to you.

## 7. CONSENT

By submitting your personal data to us you consent to the storage and use of the information you provide us exclusively for the purposes set out in this statement.

## 8. YOUR LEGAL RIGHTS: YOUR RIGHT TO ACCESS AND CONTROL YOUR PERSONAL INFORMATION

You may contact our office at any time to update or request details of information we hold.

### 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.

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**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.

You may contact us by writing to [info@visumotrave.com](mailto:info@visumotrave.com) where we will act immediately to assist your requests or alternatiely write to us at Visumo Travel Ltd. 3 Acorn BC, Northarbour Road. Cosham. Portsmouth. PO6 3TH.

### 9. AMENDMENTS

We reserve the right to make amendments to this policy in the future and this page will be updated with any changes to reflect those changes.