

# **There.Travel Privacy Policy**

When you share your personal, or business, information with There. Travel, you trust us with your information. We are committed to protecting and respecting your privacy and take this trust very seriously.

The purpose of this Privacy Policy is to explain how we collect, use, disclose and safeguard your information, through you accessing our website, making a travel enquiry with us, or a travel booking. It is also intended to advise you of the choices you have regarding our use of your information and how you can correct that information.

Using or accessing our website, giving your explicit consent either in writing o verbally, or by agreeing to our booking conditions, indicates your acceptance of this Privacy Policy and of any changes to it.

We may change this Privacy Policy at any time, and for any reason. We will alert you about any changes by updating the "Revised" date of this Privacy Policy. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on our website, and you waive the right to receive specific notice of each such change or modification. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of our website after the date such revised Privacy Policy is posted.

For the purpose of the General Data Protection Regulation (GDPR) and EU e-Privacy Directive; Privacy and Electronic Communications Regulations (PECR), our registration number is ZB811194.

### **WHO WE ARE**

We are Leeds Travel Limited, trading as There. Travel. Our registered office is Bartle House, 9 Oxford Court, Manchester, England, M2 3WQ and our company number is 15823617.

## WHAT INFORMATION DO WE COLLECT FROM YOU?

We may collect information about you in a variety of ways including on our website, when you make a travel enquiry or a travel booking, through our social media channels, at our events, through competitions or prize draws we run, and via other forms of communication including email and direct mail.

The information we collect may include:

- If you subscribe to join our mailing list we will ask for information that may include your name, postal address, email address, telephone number, age, gender, occupation, details of holiday habits and details you are interested in receiving further information on.
- In addition, when you make a travel enquiry or booking, information gathered may include credit/debit card details or bank details, passport numbers of people travelling, visa information, health information and other personal data.
- Occasionally, we may offer visitors to our websites an opportunity to participate in a survey or competition. We may also run competitions and surveys in magazines, newspapers, radio, television, by direct mail, with third parties including on their websites and on other similar media. Information collected by There.Travel when you participate may include your full name, age, postal address, email address and telephone number.
- Some of our marketing activity may include a 'recommend a friend' promotion. In this case your
  details may be provided to us by somebody who knows you. The person who has passed your
  details onto There. Travel for this activity will need to advise you and have your permission to
  send your personal details to us. Your personal information will be handled in the way as
  detailed in this privacy policy.
- By accessing our website and social media channels, our servers may also collect derivative data about you, such as your IP address, your browser type, your operating system, your access times, the device you are using to view our sites on, and the pages you have viewed directly before and after accessing our sites.

#### WHY DO WE COLLECT THIS INFORMATION?

Having accurate information about you permits us to provide you with a smooth, efficient, and customised experience. Specifically, we may use the information collected about you to:

- Facilitate, fulfil and manage your travel booking, including liaising with third party suppliers such as airlines, tour operators and ancillary travel product providers.
- Notify you about updates and changes regarding your travel arrangements.
- Provide you with a tailored travel quotation.
- Compile anonymous statistical data and analysis for use internally.
- Deliver targeted advertising, newsletters, promotions and other information regarding our website, and business practices to you.
- Email you regarding your ongoing and future travel requirements
- Send you relevant newsletters.
- Send you relevant communications by post to your given address.
- Contact you by SMS about relevant information.
- Generate a personal profile about you to make future visits to our website more personalised.
- Increase the efficiency and operation of our website.
- Monitor and analyse usage and trends to improve your experience of our website.
- Notify you of updates to our website, and booking conditions.

- Offer information on relevant new products, services, and/or recommendations to you.
- Perform other business activities as needed.
- Request feedback and contact you about your use of our website, and the service we provide you.
- Respond to customer service requests.

#### HOW WE USE YOUR PERSONAL INFORMATION

We may process, use or share information we have collected about you in certain situations as explained above.

### With your consent

Where possible we will explicitly seek your consent to use your information for any purpose other than what it was collected for. By becoming a customer, we may also rely on another legal basis to process your personal information, such as having a Legitimate Interest. Before we do this, we will carry out a suitable test to ensure it is the appropriate lawful basis for processing your personal information, and it does not infringe your rights and freedoms. We will inform you if we intend to process your information in this way, and provide a simple method for you to opt-out of the communication if you wish to do so.

### **For Contractual Purposes**

We may disclose only relevant information about you to uphold our contractual obligations to you as a customer in fulfilling your travel arrangements. This may include disclosing relevant personal information with third party businesses and organisations, including airlines, tour operators, travel ancillary providers, banking organisations, and public authorities such as customs/immigration. This may include transferring your data outside of the European Union.

# By Law or to Protect Rights

If we believe the release of information about you or your business is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule or regulation. This includes exchanging information with other entities or fraud protection and credit risk reduction.

## **Third Parties**

We will only share your personal data with third party businesses when there is a requirement to do so to fulfil our contractual obligations when processing your travel bookings. As a Data Controller we will take all suitable precautions to ensure your data is managed and processed in accordance with our own Privacy Policy when sharing your data.

#### For training purposes

If you telephone us, calls may be recorded for training and quality purposes. We will only share your personal information with our authorised travel service providers, and only as necessary to complete a transaction that you have specifically requested.

#### On our website

We may use cookies, tracking pixels, and other tracking technologies on our website to help customise our sites and improve your experience.

A cookie is a small file that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember who you are. Cookies identify the computer you are using, not you personally.

On WWW.THERE.TRAVEL we use Google Analytics to understand which website pages you are visiting and to help improve the customer journey through the website and site effectiveness. This data allows us to improve the quality of your visit and develop programs, navigation and content that will be of interest to you. Google Analytics leaves cookies on your browser but this does not identify you personally.

We currently do not use third party cookies or web beacons. The website WWW.THERE.TRAVEL system is protected by firewalls. We collect information about your computer (not your name, address, email address or telephone number) through your permanent cookie file for the purpose of assessing the effectiveness of site content and traffic. This data allows us to improve the quality of your visit.

By using our website, you agree to be bound by our Cookie Policy.

### **Internet-Based Advertising**

Additionally, we may use third-party software to serve ads on our website, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimise your online experience with us.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out in/out cookies, plug-ins, or settings.

#### **OTHER**

We may also pass your details to any successor to our business (or any relevant part of it). Information you provide may also be used for statistical purposes. We do not sell, rent or trade your personal information to third parties for marketing purposes without your express consent.

# **POLICY FOR CHILDREN**

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under the age of 13, please contact us using the contact information provided below.

#### THE OPTIONS YOU HAVE REGARDING YOUR INFORMATION

You may at any time review, change, request to see or request for the information to be deleted that we hold on you. We will deal with your request in accordance with the EU General Data Protection Regulation or the statutory UK law relating to Data Protection, whichever is enforced in the United Kingdom and its territories at the time of your request.

Any request should be addressed to:

Bartle House, 9 Oxford Court, Manchester, England, M2 3WQ

However, if you request for your information to be deleted, we may be required to retain certain information to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use, fulfil any outstanding contractual obligation to your or a third-party supplier, and/or comply with legal requirements.

#### UNSUBSCRIBE FROM COMMUNICATIONS

If you no longer wish to receive correspondence, emails or other communications from us, you may optout by:

- Clicking and following the unsubscribe link found in the footer of all email communications we send to you
- Contacting us using the contact information provided below

#### HOW WE PROTECT YOUR INFORMATION

The data we collect from you will be stored within the UK. By submitting your personal data you agree to the storing and processing of this data. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy.

# Transferring your data outside of the EU

If we need to transfer your data outside of the European Union, (e.g. If your holiday is outside of the EEA) we will ensure the organisation receiving the data has adequate safeguards in place that comply with the most up to date UK privacy laws, that individuals' rights are enforceable and effective legal remedies for individuals are available following the transfer.

## **CONTACT US**

If you have questions or comments about this Privacy Policy, please contact us in writing to:

The Data Protection Officer Bartle House 9 Oxford Court Manchester England M2 3WQ

Phone: 0113 323 9303

Email: customers@there.travel

## YOUR RIGHT TO COMPLAIN TO THE ICO

If you are not satisfied with our use of your personal data, or our response to any request you send to us to exercise any of your rights, then you have the right to complain to the Information Commissioners Office:

Information Commissioners Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113

Email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>

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7 <sup>th</sup> November 2024	Document Created	JT	November 2025
10 <sup>th</sup> November 2024	Updated ICO	JT	November 2025
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