

PRIVACY POLICY

Last updated 21 June 2018

WELCOME TO THE ADVANTAGE TRAVEL CENTRES' PRIVACY POLICY

When you share your personal and business information with **Advantage Travel Centres Ltd** and its associated businesses, you trust us with your information. This policy is meant to help you understand what data we collect, why we collect it and what we do with it.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions, or when engaging with one or more of our businesses. This privacy policy supplements the other notices and is not intended to override them.

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.

Advantage Travel Centres Ltd ("we" or "us" or "our") respects the privacy of our users ("user" or "you"). Our registered office address is 15-21 Provost Street, London, N1 7NH, company number 04698963. We are registered with the Information Commissioner's Office as a business who holds and processes personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you join as a member, work with us as a supplier or other third party, visit any of our websites listed below, including the logged in members area, any media form, media channel, mobile websites, or mobile application related or connected thereto (collectively, our "Sites"). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE SPECIFICALLY DO NOT ACCESS OUR WEBSITES AND DO CONTACT US FOR FURTHER INFORMATION.

We reserve the right to make changes to 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 Sites, 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 Sites after the date such revised Privacy Policy is posted.

For ease of navigation, these are the sections covered in this Privacy Policy:

- 1. OUR BUSINESSES**
- 2. WHAT INFORMATION DO WE COLLECT FROM YOU?**
- 3. WHY DO WE COLLECT THIS INFORMATION?**
- 4. WHAT DO WE DO WITH YOUR INFORMATION?**
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1. OUR BUSINESSES

In addition to Advantage Travel Centres Ltd, this Privacy Policy covers the following websites, businesses and their associated Sites, all of which are wholly or partly owned by Advantage Travel Centres Ltd and share some degree of access to the same member contacts, suppliers and their data. Additionally, due to the nature of their operations, some of our businesses operate an additional privacy policy.

Businesses and websites operating solely under this privacy policy:

www.advantagemembers.com	www.bigcelebrationlunch.com
Advantage Managed Services (AMS) - www.advantagemanagedservices.com	www.advantageconference.co.uk
www.myholidayinspiration.com	www.atp-me.com
www.advantageapartments.apartmentservice.com	

Advantage Businesses who have an additional privacy policy:

Advantage Financial Services Ltd (AFS)

Advantage Financial Services Ltd (AFS) is a wholly owned subsidiary of Advantage Travel Centres Ltd. Due to the nature of its business, in that it is regulated by the Financial Services Authority, AFS's has an additional Privacy Policy which can be accessed [here](#). Should you wish to find out more about this, have any queries or complaints relating to emails sent from AFS or to opt-in or opt-out of future AFS mailings then please email afs@advantagetravelcentres.com.

Advantage Holidays

Advantage Holidays is a tour operation wholly owned by Advantage Travel Centres Ltd. It too operates under an additional Privacy Policy, which you can access [here](#). Should you wish to find out more about this, have any queries or complaints relating to emails sent from Advantage Holidays or to opt-in or opt-out of future Advantage Holidays mailings then please email support@advantageholidays.com.

Worldwide Independent Travel Network (WIN)

WIN is 95% owned by Advantage Travel Centres Ltd. The business and its associated websites (www.wintravel.org, www.winhoteldirectory.com) operates under an additional Privacy Policy which can be accessed [here](#). Should you wish to find out more about this, have any queries or complaints relating to emails sent from WIN or to opt-in or opt-out of future WIN mailings then please email contact@wintravel.org.

Advantage Focus Partnership (Focus)

Focus is wholly owned division of Advantage Travel Centres Ltd. The business and its associated website operates under an additional Privacy Policy which is only available to its members. Should you wish to find out more about this, have any queries or complaints relating to emails sent from Focus or to opt-in or opt-out of future Focus mailings then please email

focusadmin@advantagebusinesstravel.com.

2. WHAT INFORMATION DO WE COLLECT FROM YOU?

We may collect information about you in a variety of ways including on our Sites and social media channels, through your membership contract or commercial agreement, through our own surveys, and via other forms of communication including email and direct mail. The information we collect may include:

Personal Data

Personally identifiable information, such as your name, postal address, email address, telephone number, passport details, and demographic information, such as your age, gender, hometown, and interests (business or personal), and health data, and financial data, that you voluntarily give us when you register with our Sites, become a member or formally agreed supplier partner of or associated to us, when you choose to participate in various activities, such as our events and conferences, surveys, competitions, message boards, social media interactions, and conversations with our members of staff. You are under no obligation to provide us with personal information of any kind, however your refusal to do so may prevent you from using certain features of our Sites, and certain benefits associated to your membership or supplier agreement.

Technical Data

Information our servers automatically collect when you access our Sites, 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.

Data from Contests, Giveaways, and Surveys and Social Media

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys or interacting with our public or private social media channels.

3. 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:

- Manage your access to the Advantage members intranet.
- Compile anonymous statistical data and analysis for use internally.
- Deliver targeted advertising, newsletters, promotions and other information regarding our Sites, and business practices to you.
- Email you regarding your membership or relevant travel industry information.
- 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 Sites more personalised.
- Increase the efficiency and operation of our Sites.
- Monitor and analyse usage and trends to improve your experience of our Sites.
- Notify you of updates to our Sites.
- Notify you of important information relating to your membership.
- 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 Sites, and/or your Advantage membership.
- Respond to product and customer service requests.
- Contact specific third parties in relation to providing you with products and services directly related to your Advantage membership only.

4. WHAT DO WE DO WITH YOUR INFORMATION?

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

For our registered members, the data we hold on you and your business will only be used for the purposes of ensuring we have up-to-date information about you and your company, relevant for fulfilling the membership services you have agreed to or requested from us, and the supplier arrangements we are legally bound to provide. Information is shared with our approved preferred suppliers, partners, professional advisors who provide consultancy, banking, legal, insurance and accounting services (including lawyers, bankers, auditors and insurers), and HM Revenue & Customs to enable them to assist us to service your business needs. We do not share your information with any other companies, nor do we sell your data to any companies. We take care to ensure any providers we select to work with comply with the GDPR.

For our preferred suppliers, the data we hold on you and your business will only be used for the purpose of fulfilling our contractual obligations to you, including but not limited to reporting, remittance, renewals and communicating with the membership about your products and services.

In the unlikely event that we need to transfer your data outside of the European Union, 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.

Furthermore, your information may be processed and disclosed as follows:

With your consent

We may use or share your personal information to communicate directly with you, and with companies, organisations or individuals outside of Advantage when we have your consent to do so. We generally require opt-in consent for the sharing of any sensitive personal information except when we are required to respond to a legal process, must fulfil our contractual obligations to you, or in the unlikely event resulting in the sale or bankruptcy of the business.

When There is a Suitable Legitimate Interest

In certain circumstances we may process or share your personal information and contact you without your consent, if we can identify a Legitimate Interest to do so. The interest may be for our, yours, third parties or others benefit. If we choose to process your information in this way, 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.

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.

For Contractual Purposes

We may disclose only relevant information about you or your business in relation to fulfilling our contractual obligations to you as part of your membership with Advantage Travel Centres Ltd and its associated businesses. We may also disclose only relevant information when required to facilitate an event or conference you attend in relation to your membership, or partnership with us.

Sale or Bankruptcy

If we reorganise or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers, however unlikely, may occur and that the transferee may decline to honour commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

The below highlights the specific legal bases we intend to use to process personal data:

Purpose/Activity	Type of Data	Lawful basis for processing
To process your membership application	Identity Contact Financial	Legitimate Interest Consent Performance of a contract with you
Information about your membership	Identity Contact Financial	Performance of a contract with you
Information about your contract with us	Contact Financial	Performance of a contract with you
Manage your supplier payments and commission payments	Identity Contact Financial Transactional	Performance of a contract with you
Supplier relationships and fulfilment of commercial contracts	Identity Contact Financial Transactional Usage Technical	Performance of a contract with you Consent

To communicate general information about our business and our services	Contact Identity Profile Personal preferences	Consent Legitimate Interest
Event/conference bookings including travel arrangements	Contact Identity Health Financial	Consent Legitimate Interest
Surveys and feedback questionnaires	Identity Contact Profile Usage	Consent Legitimate Interest
Partaking in prize draws, promotions, offers and incentives	Contact Identity Profile	Consent Legitimate Interest
Reporting and analysis	Identity Contact Financial Transactional Profile Usage	Consent Performance of a contract with you
To administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Contact Technical Usage Profile	Legitimate Interest
Financial services - including insurance/bond quotes, banking, claims	Identity Contact Financial	Consent Legitimate Interest Performance of a contract with you Legal requirement

5. THIRD PARTY WEBSITES

Our Sites may contain links to third-party websites and applications of interest, including advertisements and external services, that may or may not be affiliated to us. Once you have used these links to leave our Sites, any information you provide to these third-parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or applications that may be linked to or from our Sites.

6. HOW SECURE IS THE INFORMATION WE HOLD ON YOU?

We work hard to protect Advantage Travel Centres Ltd, its businesses and its users from unauthorised access to or unauthorised alteration, disclosure or destruction of information that we hold. In particular:

- We encrypt many of our services, using for example SSL.
- We review our information collection, storage, and processing practices, including physical security measures, to guard against unauthorised access to systems, and in line with the General Data Protection Regulation and Privacy and Electronic Communications Regulations.
- We review the types of information we hold, the reasons we hold it, and how long we hold it for and ensure our processes for doing this comply with the most up to date data privacy laws.
- We restrict access to personal information to Advantage's employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

Whilst we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorised parties. Therefore, we cannot guarantee complete security if you provide personal information to us.

7. HOW WE USE YOUR DATA ON OUR WEBSITES?

Cookies

We may use cookies, tracking pixels, and other tracking technologies on our Sites to help customise our Sites and improve your experience. For more information on how we use cookies, please refer to our Cookie Policy posted on our Sites, which is incorporated into this Privacy Policy. By using our Sites, you agree to be bound by our [Cookie Policy](#). We will ask for your consent to our use of cookies in accordance with our Cookie Policy when you first visit our site.

Website Analytics

We may also partner with selected third-party vendors, such as Google Analytics, to allow tracking technologies and remarketing services on our Sites through the use of first party cookies and third-party cookies, to, among other things, analyse and track users' use of our Sites, determine the popularity of certain content and better understand online activity.

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.

Controls for Do-Not-Track Features

Most web browsers and some mobile operating systems include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected.

No uniform technology standard for recognising and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is

adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

8. HOW LONG DO WE KEEP YOUR INFORMATION?

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.

By law we may have to keep basic information about our members and suppliers (including Contact, Identity, Financial and Transaction Data) for up to eight years after initially capturing the information, depending on the intended use of the data captured.

Where passport details and emergency contacts details are held for the purpose of performing travel arrangements for events and conference, they will be deleted within 28 days of travel.

In some circumstances you can ask us to delete, change, withdraw or suppress your data – see below for further details.

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.

9. 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.

10. 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 or transferred to a third party, that we hold on you. We will deal with your request in accordance with either 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.

We are committed to upholding your full rights contained in the GDPR, which include:

- **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.

To make a request regarding your personal data, or for more information, please contact us using the information provided below.

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 and/or comply with legal requirements.

Emails and communications

If you are an Advantage member you will receive correspondence and email communications from us in service of your membership services contract. As part of the membership services we will also send you marketing material for service providers that you may benefit from as part of your membership. This is to allow you to benefit from the services offered as part of your membership contract. The same may apply if you are a supplier, you may receive correspondence and email communications about the services, events and conferences we offer. If you no longer wish to receive correspondence, emails or other communications from us, you may opt-out by:

- Logging into the Advantage members intranet site and updating your preferences
- 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

Please note, if you are an Advantage member or a trade supplier, and you have requested to opt-out of our marketing communications we may by law still be required to contact you in certain circumstances, with relevant information, to carry out correspondence in relation to your membership contract or supplier contract.

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

11. COMPLIANCE AND COOPERATION WITH REGULATORY AUTHORITIES

We regularly review our compliance with our Privacy Policy. We also adhere to all UK data laws including, the EU General Data Protection Regulation (GDPR); and the Privacy and Electronic Communications Regulations (PECR) (as may be amended from time to time).

When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

12. CONTACT US

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

The Data Protection Team
Advantage Travel Centres Ltd.
21 Provost Street
London
N1 7NH
Phone: (020) 7324 3972

Or by email to: GDPR@advantagetravelpartnership.com

13. 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: casework@ico.org.uk