

## **Privacy policy**

We do our utmost to protect your privacy. If you request our brochure, sign up to receive our monthly e-newsletter or make a booking with us, this policy explains what information about you we will collect, how we will use it, the conditions under which we may disclose it to others, and how we keep it secure.

The core principles of our policy:

1. We collect and use individual client details only where we have legitimate business reasons and are legally entitled to do so.
2. We are transparent in our dealings with you as to what information about you we will collect and how we will use your information.
3. We use personal data only for the purpose(s) for which they were originally collected.

### **Personal information we collect**

When you contact us (by e-mail, phone, fax, letter, in person or via our website) to enquire about our trips, receive further information or make a booking, we must collect personal details in order to fulfil your request.

Most of the time we need only your name and contact details (telephone number, postal address and/or e-mail address), but if you plan to enter into a contract with us by making a booking, we require further information relating to you (and your travel companion(s), if applicable). These may include:

- Full name(s) and address(es);
- Dates of birth;
- Passport details;
- Travel insurance details;
- Credit/debit card or other payment details;
- Emergency contact details;
- Special requirements (such as a disability or medical condition which may affect your enjoyment of the trip, as well as any dietary restrictions).

We may also ask some further voluntary questions during registration for certain services (for example, the destinations or themes of holidays you are most interested in) so we can gain a clearer understanding of our clients.

You are responsible for ensuring that other members of your party are aware of the content of this Policy and consent to you acting on their behalf in all your dealings with us.

### **How we use and retain your personal data**

We may retain personal details for the following purposes:

- To complete and manage your booking(s);
- To send booking updates and for general communication;
- To contact you with details of new trip departures, forthcoming events, surveys or competitions;
- To disclose to our service providers (in so far as reasonably necessary) in order to secure your booking. These can include overseas destination management companies, and accommodation and transport suppliers. Please note some may be located outside the UK/EEA;
- Card payment transactions relating to our website and services are handled by our payment services provider, SagePay. We share transaction data with SagePay only to the extent necessary for the purposes of processing your payments and any related matters. [View SagePay's privacy policy](#).
- In addition to the specific purposes mentioned above, we may also process your details if necessary for compliance with a legal obligation to which we are subject;
- To disclose to organisations that perform business functions on our behalf and use the information for analysis including monitoring, measuring and assessing trends.
- To disclose your information for immigration, security and anti-terrorism purposes, if requested by overseas government authorities.

## Transferring information outside the EEA

There are circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA) in order to manage your booking. Transfers to these countries will be protected by appropriate safeguards, namely the use of data protection clauses.

Our service providers will not retain any personal data that we process for longer than is necessary for the purpose of your booking.

## How we protect your data

We ensure that we have appropriate physical and technological security measures in place to protect your information, and that when we outsource any processes that the service provider has necessary security accreditations.

The information you provide to us is held in our reservations and CRM systems, each of which are located on the servers of approved third-party suppliers. These third parties are [TigerBay](#) and [Radar Marketing](#).

We are compliant with PCI DSS, which means that we adhere to high security standards in order to protect your payment card details when you make payments to us.

We do not share your personal information with others for marketing purposes.

## Your rights

Your rights under data protection law are:

- (a) The right to access;

You have the right to know what personal data we hold about you, where we process it and to be

able to access it. We will supply you with a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a fee.

(b) The right to rectification;

You have the right to have any inaccurate personal data we hold about you rectified and, for the purposes processing a booking, to have any incomplete details completed.

(c) The right to erasure;

In some circumstances, you have the right to have your personal details erased without delay unless we have to comply with a legal obligation. Those circumstances include that your personal data is no longer necessary in relation to the purposes for which we collected it or you withdraw consent for us to process it.

(d) The right to restrict processing;

You have the right to restrict the processing of your personal data if you contest its accuracy, it was processed unlawfully or we no longer need the personal data for the purposes of our processing. Where processing has been restricted on this basis, we may continue to store your personal data.

(e) The right to object to processing;

- If the processing is based on the justification ‘necessary for a public interest’ or ‘necessary for the purposes of the legitimate interests pursued by the controller’;
- If personal data is processed for marketing purposes; and
- If personal data is processed for scientific, historical research or statistical purposes

(f) The right to data portability;

You have the right to receive your personal data from us in an accessible and readable format.

(g) The right to complain to a supervisory authority; and

If you believe that the way we process your personal data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your residence, your place of work or the place of the alleged infringement.

(h) The right to withdraw consent.

As we can only process your personal information with your consent, you have the right to withdraw that consent at any time.

You may exercise any of your rights in relation to your personal data by [contacting us](#).

## Use of cookies

Cookies are small text files held on your computer. They allow us to give you the best browsing experience possible and mean we can understand how you use our website. Each web domain can

only access cookies stored by that specific web domain, meaning that only the Cultural Travel Company servers can access the cookies set by culturaltravel.com. By using our website you accept our use of cookies.

The cookies allow us to identify your computer and find out details about your last visit. The information collected by cookies does not personally identify you; it includes general information about your computer settings, your connection to the Internet e.g. operating system and platform, IP address, your browsing patterns and timings of browsing on the website and your location.

You can delete and block cookies but parts of our website won't work without them. The links below explain how you can control cookies via your internet browser.

[Internet Explorer](#)

[Chrome](#)

[Safari](#)

[Firefox](#)

[Opera](#)

A visit to a page on [www.culturaltravel.co.uk](http://www.culturaltravel.co.uk) may generate the following types of cookie:

**1. Session cookies.** Session cookies last only for the duration of your visit and are deleted when you close your browser. These simply enable us to identify that the same person is moving from page to page. Without session cookies many user functions on our website would not work. To make sure things run smoothly while you are using our website, a unique ID will track your session from page to page. Session cookies also keep you signed in whilst you are logged in to your Alumni account.

**2. Persistent cookies.** We also use certain cookies that are persistent, meaning that they last beyond your session. Persistent cookies help our website remember you as a user each time you use the same computer to revisit us. Persistent cookies last for a pre-defined period unless they are deleted.

**3. Anonymous analytics cookies.** We use Google Analytics for statistical purposes to track how many individual unique users we have and how often they visit our website. We collect data listing which of our pages are most frequently visited and by which types of users and from which countries. You can opt out of these by visiting the [Google Analytics opt out page](#).

## Links to other websites

Our website may contain links to websites run by other organisations. This privacy policy applies only to our website. We cannot be held responsible for the privacy policies and practices of other websites.

## Marketing communications

We will not contact you for marketing purposes by post or e-mail unless you have given us prior consent to do so.

If you are subscribed to receive our monthly e-newsletter then we track whether you open the message. Unless you have chosen not to download images automatically in your e-mail provider, your opening of the e-mail will report back to our systems that you have read the message. We also employ tracking of any links you click in our messages.

You may unsubscribe at any time. Please [contact us](#) to update your marketing preferences.

## Our details

This website is owned and operated by Gary Whyte.

We are registered in England under registration number 2314294. Our registered office is at Voysey House, Barley Mow Passage, London, United Kingdom, W4 4GF.

You can contact us:

- By post using the above address;
- Using our website contact form, '[Ask a question](#)';
- By telephone, on +44 (0)20 3370 1988;
- By e-mail, using [info@culturaltravel.co.uk](mailto:info@culturaltravel.co.uk).

## Data Protection Officer

Our Data Protection Officer is Alice Franceschi. She can be contacted by e-mail at [alice.franceschi@martinrandall.co.uk](mailto:alice.franceschi@martinrandall.co.uk) or by telephone on +44(0)20 8742 3355.

## Copyright

The contents of culturaltravel.co.uk are the property of The Cultural Travel Company Ltd and subject to intellectual property protection. No content of the website may be reproduced, copied, published, distributed or placed onto other websites without our consent.

*This policy is reviewed regularly; it was last updated on 22 May 2018. If you have any questions about your privacy and data security please [contact us](#).*