

# PRIVACY POLICY

Freedom Travel understands and respects the importance of your privacy. This Privacy Policy (the “Policy”) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, in respect of your relationship with us as a customer or a potential customer. This information may be collected via our websites (“Sites”), our call centres, our networks of Sales Agents (defined below), or our social media channels (collectively, our “Services”). Please read the following information carefully. You are responsible for ensuring that the other members of your party are aware of the content of this Privacy Policy and you have checked with them that they agree to their personal data being passed to us too make a booking or other purchase on their behalf.

By making a booking/purchase or otherwise submitting your personal data to us, we will transfer, store or process it as set out below. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## Who does this policy apply to:

This Privacy Policy applies to the holidays, travel products and services offered by Freedom Travel’s Sales Agents in the UK. When we say ‘Freedom Travel’, ‘we’ or ‘us’ in this Policy, we’re generally referring to the separate and distinct companies that make up Freedom Travel (depending on the context of the Services you use). This Policy applies to personal data processed by the following companies, including data collected when you make bookings, purchases and enquiries with them:

- **The Freedom Travel Group Limited** trading as Freedom Travel Group: The company that trades under the name Freedom Travel and operates package holidays and other travel arrangements organised by its network of independent travel agents.
- **Future Travel Limited** trading as Freedom Personal Travel Advisors: The company that trades under the name Personal Travel Advisors and operates package holidays and other travel arrangements organised by its network of self-employed contractors.

For the purpose of this Policy, the independent travel agents and self-employed contractors shall be collectively referred to as “Sales agents”.

Each independent travel agents may publish its own supplementary privacy policy to explain how it will process and handle any additional personal data it collects from you. Any such supplementary policies apply in addition to this Policy.

## What types of personal data do we collect about you and why do we collect it:

**We will collect certain personal data about you and about any other person you include on your booking. The sort of personal data we collect will be information that you provide to us, that we collect from you or observe about you, or that we obtain from other sources. Read on to find out more.**

### Personal data you give to us

- When you make a booking/purchase or enquiry we will ask you for your name, address, email address, telephone number, date of birth, and personal travel

preferences. We need to collect this information in order to arrange the travel and other services you are requesting.

- When you request to make a booking, we will ask you for personal data such as information concerning dietary requirements, medical conditions, disabilities and special requirements. We need to collect this information so as to be able to consider your particular needs in relation to a booking and where those needs can be met, we may have to share that data with our third party suppliers and transfer it outside the European Economic Area (EEA), as described in this Privacy Policy. If you do not want to provide this information to us, or once you have provided us with this information you ask us or our data compliance department to stop processing this information, it may mean we won't be able to provide all or parts of the services you have requested. If we have to cancel your booking/purchase as a result, you may incur a cancellation charge.
- If you enter a competition or promotion, complete a survey, or if you report a problem with any of our Services, we will collect your name and relevant contact information.
- We may ask to see and retain a copy of your passport details and other identification document if for example you are purchasing foreign currency or completing a money transfer.
- If you contact us, we may keep a record of your email or other correspondence, and if you call us by telephone, we may monitor and/or record phone conversations for training and customer service reasons.
- If, when using our Services, you make a holiday enquiry with one of our travel consultants and you enter or provide any of your personal data (including telephone number or e-mail address), but do not make a booking/purchase, we will retain and use the data you've provided for a limited time and purpose, each mentioned below.

To help us keep your information current, accurate and complete, please ensure you tell us if anything needs to be changed.

### **Personal data we collect and/or observe about you**

Based on how you have used our Services in the past and your activity on our website, social media channels, we collect the following personal data about you:

- Details of the services we have provided to you in the past, including your previous travel arrangements, such as holidays and other purchases, and matters related to those arrangements, such as details of your previous requirements or complaints.
- Images of you taken on our or our Sales Agents' CCTV systems at our premises.

### **Personal data obtained from Sales Agents**

We might also receive your personal data from third party sources who collect information about you on our behalf. This includes:

- If you tell a subcontractor that you would like to receive marketing communications from Freedom Travel, they will securely transfer your contact details and marketing preferences to us.

- If you book a holiday through a Sales Agent, certain personal data (as applicable to your booking, such as your name, date of birth or any special requirements you have) will be passed to us to provide the services you have requested/booked.

## **Where is your data stored and who it's shared with:**

**Your personal data is held on a combination of our own systems and systems of the suppliers we use to provide our services. Read more here.**

When you provide your personal data to us, some of the personal data you provide will need to be passed to and processed and stored by relevant third parties, such as our technology partners to administer the services we provide, and airlines, airports, hoteliers, insurance companies and ground handling agents, so that they can provide you with the arrangements and assistance you require.

Some of these third parties may be based outside of the European Economic Area ("EEA"). Organisations that are based outside of the EEA may not be subject to the same level of controls in regard to data protection as exist within the UK and the EEA. We aim only to transfer your data to third parties outside of the EEA where either:

(a) your personal information will be subject to one or more appropriate safeguards set out in the law. These might be the use of standard contractual clauses in a form approved by regulators, or having our suppliers sign up to an independent privacy scheme approved by regulators (like the US 'Privacy Shield' scheme); or

(b) the transfer is necessary to enable your contract to be performed.

In order for you to travel overseas, we may be required to disclose certain of your personal data to government bodies or other authorities in the UK and in other countries, such as those responsible for immigration, border control, security and anti-terrorism. Even if it is not mandatory for us to provide information to such authorities, we may exercise our discretion to assist them where appropriate in the interests of detecting and preventing criminal activity .

Freedom Travel is part of the Thomas Cook Group. The Thomas Cook Group includes the Freedom Travel companies Freedom Travel Group and Freedom Personal Travel Advisors, our subsidiaries, our ultimate holding company and its subsidiaries. We may disclose your personal information to any member of the Thomas Cook Group for business purposes (those business purposes include holding your data on central/shared systems for administering bookings and supporting customers in destination countries).

We may pass your data to relevant third parties for the purpose of detecting and preventing fraudulent payments or bookings.

## **How do we use your information when providing our services to you:**

In order to provide our services to you, we use the information we hold in a number of different ways. We process your information either because it is necessary for us to do so as part of a contract you enter into, or because we have a legitimate business reasons for doing so. Read more here.

The following activities are carried out by us using your personal data because it is necessary in relation to a contract which you have entered into or because you have asked for something to be done so you can enter into a contract:

- Administering your booking internally and communicating your booking externally with our suppliers, to ensure the services you have requested are arranged;
- To communicate with you regarding your booking or any other purchase, including sending booking confirmation and travel documents;

We may use and process your personal information as set out below where it is **necessary for us to carry out activities for which it is in our legitimate interests as a business to do so:**

- To improve the customer experience:
  - To allow you to participate in interactive features of our Sites when you choose to do so;
  - To ensure that content from our Sites is presented in the most effective manner for you and for your computer; and
  - To notify you about changes to our service.
- To protect our business against financial loss:
  - For debt collection or credit vetting; and
  - For payment card and booking verification.
- To maintain a safe and secure environment and prevent and detect criminal activity.
  - Using CCTV in our premises.
- To promote our business and improve our products and services:
  - To send marketing correspondence about products and services similar to those you have previously bought from us. You can opt out and object to our sending you electronic marketing information and this option will be included in every marketing message we send you. See the section ‘When and how do we use your information for marketing for more information’;
  - For internal research/analysis to improve the quality of our Services, the products we offer and new products we are developing by:
    - Inviting customers to take part in surveys or customer/business discussion groups; and
    - Using aggregated customer data to make informed decisions based on analysis of customer booking/purchase trends and behaviours.
- To support any potential company sale or acquisition:
  - In the event that we sell or buy any business or assets, we may disclose your personal data to the prospective seller or buyer of such business or assets.

We may use and process your personal information as set out below where we consider that it is in your **vital interests** that we do:

- To assist you or arrange for assistance to be provided to you by third parties either in the event of an incident or emergency.

We may use and process your personal information as set out below where we have your **consent** to do so:

- To assist you or arrange for assistance to be provided to you by third parties where you have special requirements in relation to medical, health or diet; and
- To send marketing correspondence about our products and services where we have asked for your permission to do so. See the section 'When and how do we use your information for marketing for more information'.

We may use and process your personal information as set out below where there is a **legal requirement** for us to do so:

- For resolving complaints, dealing with disputes and legal proceedings. This might include contacting you proactively if we need to resolve any issues you may be experiencing or have experienced with a booking/purchase.

### **When and how do we use your information for marketing:**

To find out more about our marketing communications, including when and how we may contact you and how you can opt out of marketing, please read more here.

If you have made an enquiry on one of our Sites or through a Sales Agent, your personal data may be used by Freedom Travel and our Sales Agents in the ways the law allows, to contact you by post, electronic means (e-mail or text message) and/or by phone with information and offers relating to products or services that you can book/purchase from Freedom Travel. Freedom Travel and our Sales Agents will only do this if you did not opt out of such marketing at the point where we collected your contact details.

If you have not made an enquiry or purchase, Freedom Personal Travel Advisors and the Sales Agents will only send to you information and offers by email or text message only if you sign up (opt in) to receive such marketing, either directly through us or by telling a third party that you would like to receive marketing from us.

Travel and travel related services, insurance and gift cards are the types of products and services that can be booked/purchased through Freedom Travel. You will only receive marketing communications about those which we think are relevant to you.

We will **not** pass your contact details to a third party for them to send to you marketing communications unless you have expressly agreed that we may do so.

### **How do we personalise our marketing to you:**

We may use your personal information to try to ensure any marketing communications we send to you are offering products or services likely to be of interest to you.

### **What you need to do if you don't want our marketing communications:**

We understand you might not want to hear from us and that's ok. It is easy to opt-out or unsubscribe, please read more here.

You have the right at any time to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by selecting the 'no marketing' option on the forms we use to collect your data. You can also unsubscribe from marketing communication by using the link on any email marketing you receive or by advising the Sales Agent that you booked through, or otherwise exercise this right at any

subsequent time by sending an unsubscribe request to: Marketing, Freedom Travel, 4<sup>th</sup> Floor Cardinal House, 20 St Marys Parsonage, Manchester, M3 2LY.

## **Your rights in relation to any personal data we hold about you:**

You have a number of rights in relation to your personal information under data protection law. To find out more, please read [here](#).

### **Your Right to Access Your Personal Information**

You have the right to make a Data Subject Access Request in many circumstances. That is a request for access to the personal information that we hold about you. If we agree that we have to provide personal information to you (or someone else on your behalf), we'll provide it to you or them free of charge.

We may ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information. That may include information about your previous booking(s) or other purchases. We will ask you to provide this before providing a copy of any of your personal information we may be holding to you or another person on your behalf. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

Please see the section titled 'How to Contact Us' if you need to make a Data Subject Access Request.

### **Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting our customer experience team.

### **Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out in section above titled '**How do we use your information when providing our services to you**', you may withdraw your consent at any time. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, please see the section titled '**What you need to do if you don't want our marketing communications**' for further details. If you would like to withdraw your consent to us processing any information concerning dietary requirements, medical conditions, disabilities and special requirements, please contact our customer experience team. Please note if you ask us to stop processing this information, it may mean we won't be able to provide all or parts of the services you have requested. If we have to cancel your booking/purchase as a result, you may incur a cancellation charge.

If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

### **Objecting to our use of your personal information and automated decisions made about you**

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), you may object to us using your personal information for these purposes by emailing or writing to us at the address provided at the end of this policy. Except for the purposes for which we are sure we can continue to

process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

### **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Provided we do not have any continuing lawful reason to continue processing or holding your personal information, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. We may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

### **Transferring your personal information in a structured data file**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out in section titled '**How do we use your information when providing our services to you**', you may ask us to provide you with a copy of that information in a structured data file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

### **How to contact us:**

Any subject access request can be made in writing to:

Compliance Dept  
Freedom Travel  
4<sup>th</sup> Floor Cardinal House  
20 St Marys Parsonage  
Manchester  
M3 2LY

Alternatively you can make a subject access request by email to: [customerexperience@freedomtravelgroup.co.uk](mailto:customerexperience@freedomtravelgroup.co.uk).

Once you have made your request and provided us with the information we need to begin a search for the data we hold on you (including proof of identity), we will have 30 days to respond.

### **Making a complaint**

We encourage you to contact us if you have a complaint and we will seek to resolve any issues or concerns you may have.

You have the right to lodge a complaint with the data protection regulator where your legal rights have been infringed. The contact details for the Information Commissioner's Office (ICO), the data protection regulator in the UK, are available on the [ICO website](#),

where your personal information has or is being used in a way that you believe does not comply with data.

If you wish to contact us about this Privacy Policy, you can e-mail or write to Freedom Travel Data Protection Officer using the contact details above.

### **Keeping hold of your personal data:**

If you want to find out more about our data retention policy, please read more here.

Where you've made a booking or other purchase with us, your personal information will be retained to ensure we provide the best possible customer service to you. We also retain your personal data for legal and audit purposes.

### **What is our approach to data security:**

We take data security very seriously, to find out our approach to this please read more here.

The transmission of information via the internet is not completely secure, and although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Sites, therefore any transmission is at your own risk. Once we have received your information, we will take all reasonable steps to keep your personal data secure and to try to prevent any unauthorised access to it. All information you provide to us is stored on our secure servers.

### **What happens when you follow a link from our website to a third party website:**

Our Sites include links to other websites which include privacy policies of their own. To learn more about this, please read here.

Our Sites contains links to and frames of websites of our principals, suppliers, advertisers and other third parties. You can tell when a third party is involved in supplying a product or service you have requested because their name will appear with ours. If you follow a link or otherwise use any of these other websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or for these third party websites. Please check these policies before you submit any personal data to these websites.

### **Changes to this Privacy Policy**

We reserve the right to update or alter this Privacy Policy from time to time.

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