

PRIVACY POLICY

This privacy policy (together with any other documents referred to within this policy) describes how Luxury Travel Studio collects and uses the personal information you provide (“personal data”) to us through our website or offline.

We have a legal duty to protect your privacy and personal data and we safeguard your personal data and maintain security standards. This Privacy Policy sets out:

- When we collect your personal data and what we use it for
- The types of personal data we collect
- Who we share your personal data with
- How we protect your personal data
- How long we hold your personal data for
- Your rights and choices about the personal information that we hold

It also covers:

- Available third party links
- Creating social network profiles
- Our offline and online privacy policy
- Cookies
- Changes to our privacy policy

We collect your personal data as a data “controller” for the purpose of the UK General Data Protection Regulation (as tailored by the Data Protection Act 2018).

WHEN WE COLLECT YOUR PERSONAL DATA AND WHAT WE USE IT FOR

We require to collect your personal data when you register on our website or offline, place an order, respond to a survey, fill out a form or contact us (via our website, e-mail or telephone).

We will only process your personal data when we have a lawful basis for doing so. The following lawful bases will apply in this context:

i. Contract:

Any of the personal data we collect from you is processed by us as necessary for the purposes of delivering travel agent services under our contract with you or for taking steps to enter into a contract with you to deliver travel agent services. In order to do this, we may use your personal data in the following ways:

- to make/fulfil your booking, including: preparing a travel itinerary based on your specific requirements, processing your booking, sending you a booking confirmation, assessing your needs to determine suitable products of services, sending you requested product or service information, sending you product updates or warranty information, administering your account
- to assist you in respect of your booking/holiday arrangements
- to communicate with you about your booking and to notify you of any changes to your booking or our services
- to complete or assist with the completion of mandatory Advance Passenger Information or other necessary electronic travel authorisations

- to allow us to consider your comments, questions and suggestions and respond, if necessary and to assist with the handling of any complaint you may have
- to identify any issues
- to enable or facilitate the exercise of our rights under our booking terms and conditions
- to produce evidence of what was said, should the need arise

ii. Legitimate interests:

We will also process your personal data in pursuit of our legitimate interests to improve and promote our services:

- to administer competitions, promotions or surveys that you have entered, and notify you if you won
- to personalise your experience (your information helps us to better respond to your individual needs), including displaying content based upon your interests; where you have given permission for a location-based service through your browser or App: displaying content based upon your location, checking you in to a store or other location to enable you to earn loyalty rewards or let know where you are, providing you with local search results,
- providing you with special local offers, enabling designated to track your location, mapping routes and provide directions to locations that you specify; enabling you to share your location with friends
- to improve our website (we continually strive to improve our website offerings based on the information and feedback we receive from you)
- to improve customer service (your information helps us to more effectively respond to your customer service requests and support needs), including by conducting research and analysis
- to display advertising on our website / App or manage our advertising on other websites / Apps with our ad network partner who uses technologies to collect non-personally identifiable information about your activities on this website / App and other websites / Apps to provide you targeted advertising based upon your interests

iii. to comply with a legal obligation:

- as required by law and government authorities at departure locations/destinations, for immigration, border control, security (including anti-terrorism requirements) and any other purpose as deemed appropriate by law)

iv. Vital Interests:

- where the processing is vital to protect someone's life. For example, responding to accidents/similar incidents

v. Consent:

- where you have consented to us using your personal data for a particular purpose, such as when you give us permission to process your personal data when you register on our website / App, or offline

Note: where we need to process special categories of personal data belonging to you, such as health data provided for medical reasons, we will only carry this out if we (i) have your explicit consent to do so, (ii) if it is necessary to establish, exercise or defend legal claims or (iii) if it is necessary to protect your vital interests where you are physically or legally incapable of providing explicit consent

Unfortunately, failure to provide your personal data when making a booking will mean that we will not be able to process your booking.

THE TYPES OF PERSONAL DATA WE COLLECT

We may collect the following personal data from you in the following circumstances:

i. when you browse our website / App:

- travel preferences
- information regarding your browsing/usage activities - about how you interact with us such as what content you viewed and which areas of our website / App you visited
- Information on how you accessed our website / App - device information, such as your IP address, browser type, referring / exit pages, operating system, mobile device ID, device type, cookies, mobile service carrier and online identifiers
- Social preferences, interests and activities
- location-based data, where permitted by you through your browser (such as information about the wi-fi routers closest to you and the mobile phone IDs of the towers closest to you)

Note: you may visit our website anonymously by changing the settings on your browser.

ii. when you make an enquiry with us to provide you with a travel itinerary or make a booking through us via e-mail, telephone, post or through social media:

- personal and contact information, such as name, username, email address, mailing address, phone number, passport details (and other ID document information) and airline executive numbers
- payment/billing information, such as credit/debit card numbers and billing address
- Insurance details
- general information concerning your interests, any special requests or special occasions you may have
- information regarding your purchase history or current bookings
- telephone call recordings
- relevant medical/health information and any special dietary, religious or disability related requirements that you have
- information regarding your confirmed bookings, including what you booked, when you made your booking, the tour operator/principal you booked with, the price you paid and credit or other payment information
- information regarding your browsing/usage activities - about how you interact with us such as what content you viewed and which areas of our website / App you visited
- Information on how you accessed our website / App - device information, such as your IP address, browser type, referring / exit pages, operating system, mobile device ID, device type, cookies, mobile service carrier and online identifiers
- Social preferences, interests and activities
- information about your business, such as company name, company size and business type
- demographic information, such as household income, age, education, gender, interests and post code
- telephone recordings

iii. when we have exchanges with you (by e-mail, telephone, post or through social media) (in addition to the above) about our travel agency services or your holiday:

- correspondence with you, including complaints
- information regarding your purchase history or current bookings
- telephone call recordings
- any personal data that you provide when you make contact with us, including your name, username, email address, mailing address, phone number, payment details, passport details (or other ID document information) and executive airline numbers

- your feedback and/or responses made to customer surveys and questionnaires
 - telephone recordings
- iv. when you provide us with details of other individuals e.g. other people included in your booking or your next of kin
- personal data concerning those other individuals which you provide to us (including all such personal data as described in this Privacy Policy)

Note: when you provide personal data that belongs to other individuals, it is essential that you obtain their agreement to use their personal data on their behalf and that you bring this Privacy Policy to their attention before providing any such personal data to us.

WHO WE SHARE YOUR PERSONAL DATA WITH

Acting as a travel agent, we will pass your personal data onto any third party tour operator / travel company / principal as necessary to complete your booking and for them to process your payment for your booking. In most cases, these third parties will be separate controllers of your personal data. This privacy policy applies only to Luxury Travel Studio and we recommend that you read the Privacy Policy of your tour operator / travel company / principal also.

Your personal data may be accessed by or given to our staff, contractors and agents who assist us or act on our behalf:

- to operate our website / App, conduct our business as a travel agent, including delivering services to you
- to protect the rights, property and safety of Luxury Travel Studio, our customers or others, including for the purposes of fraud protection and credit risk reduction, or responding to a government request
- in the event that we sell or buy any business or assets, in which case, we may disclose personal data held about our customers to the prospective seller or buyer of such business or assets
- in respect of a merger, acquisition, or sale of all or a portion of Luxury Travel Studio assets, in which case personal data held about our customers will be one of the transferred assets; or
- as required by law to comply with any legal obligation or in order to enforce or apply our website terms and conditions, service agreement or other agreement.

We may also be required to pass your personal data with regulatory bodies (for immigration, border control, security and anti-terrorism requirements)

Your personal data, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.

Your personal data is held on our computer records and paper records in the UK / EU.

Your personal data may be transferred outside of the EU for the purpose of providing you with the travel products you are booking, depending on the location of the tour operator / travel company/ principal with whom you are booking with. This may mean that your personal data may be sent to countries that have less stringent data protection than those in the UK.

HOW WE PROTECT YOUR PERSONAL DATA

The security of your personal data is important to us. We implement a variety of security measures to maintain the safety of your personal data when you make a booking or enter, submit, or access your personal data.

We offer the use of a secure server. All supplied commercially sensitive / credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our database only to be accessed by those authorised with special access rights to our systems who are required to keep the information confidential.

We follow generally accepted industry standards to protect your personal data, both during transmission and once we receive it, against unauthorised or unlawful processing and accidental loss, destruction or damage. Unfortunately, the transmission of information via the internet is not completely secure. Although we take reasonable endeavours to protect your personal data, we cannot guarantee the security of your personal data transmitted through our website / App, any transmission is at your own risk.

HOW LONG WE HOLD YOUR PERSONAL DATA FOR

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at info@luxurytravelstudio.com. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We will securely delete personal data when it is no longer required in accordance with this paragraph. However, if we need data for analytical, historical or other legitimate business purposes after it is no longer required, we will anonymise it before retaining it for these purposes.

YOUR RIGHTS AND CHOICES ABOUT THE PERSONAL INFORMATION THAT WE HOLD

You have the following rights under the data protection legislation in relation to your personal data held by us:

- the right to request access to your personal data held by us
- where any of the personal data we hold about you is inaccurate or incomplete, the right to request that such personal data is rectified
- the right to request that we erase your personal data (subject to conditions); and
- the right to restrict and / or object to the processing your personal data by us in certain circumstances

Note: we will rectify and update your personal data when requested by you, except where we have to keep it for legitimate business or legal purposes.

If you wish to exercise any of the above rights, please contact us by emailing info@luxurytravelstudio.com providing details of your request.

If you are dissatisfied with our data processing activities, you have the right to complain to the Information Commissioner's Office at www.ico.org.uk.

AVAILABLE THIRD PARTY LINKS

Our website features links to other websites – including all the links on our 'links' pages. This privacy policy applies only to Luxury Travel Studio.

Other websites have their own privacy policies and when clicking through to another website / App we strongly recommend reading its privacy policy and terms and conditions, especially as the way in which personal data may be collected from you may vary. We do not accept any responsibility or liability in respect of the websites of any third parties.

Any views or opinions along with special offers and promotions on external websites / Apps may not represent the product offering / opinion or special offers at Luxury Travel Studio.

CREATING SOCIAL NETWORK PROFILES

We enable you to create a profile, and share information such as messages, photos, and videos with others within your network through our website. We cannot control the actions of others with whom you may choose to share your pages and information. Also, we cannot guarantee that the content you post on our website / App will not be viewed by others outside your network.

OUR ONLINE AND OFFLINE PRIVACY POLICY

This privacy policy applies only to personal data collected through our website/ App and offline (by telephone and/or post).

COOKIES

This website uses “Cookies” to ensure your experience of the website, and our ability to improve it, is enhanced. Cookies ask for permission to be placed on your computer, laptop or mobile device and once accepted place small data files to your browser.

Please see our separate Cookie Notice for further information on how we use cookies.

CHANGES TO OUR PRIVACY POLICY

This Privacy Policy replaces all previous versions.

We reserve the right to make changes to or replace this Privacy Policy. If we decide to change or replace our privacy policy, we will post those changes on this page, and / or update the privacy policy modification date below.

If you have any questions concerning this Privacy Policy or how we use your personal data, please contact us in writing at Luxury Travel Studio Ltd, c/o Accrida Ltd, Regus House, Admirals Park, Victoria Way, Dartford, DA2 6QD.

or by email: info@luxurytravelstudio.com

This policy was last modified on 8 February 2021.