

# PRIVACY NOTICE

Canterbury Travel is a trading name of Canterbury Travel (London) Limited, a Brooklyn Travel Limited company.

Brooklyn Travel Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or when you otherwise provide personal data to us via other means (such as over the telephone) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so that you can easily click through to the specific areas set out below.

Please also refer to the Glossary that we have set out at the end of the Policy, if there is any terminology used in this privacy notice that you are unfamiliar with or that you don't fully understand.

- 1. Important information and who we are**
- 2. The data we collect about you**
- 3. How your personal data is collected**
- 4. How we use your personal data**
- 5. How we disclose your personal data**
- 6. When we transfer your data overseas**
- 7. How we secure your data**
- 8. How long we retain your data for**
- 9. Your legal rights**
- 10. Glossary**

## 1. Important information and who we are

### Purpose of this privacy notice

This privacy notice aims to give you information on how Brooklyn Travel Limited collects and processes your personal data, including any data you may provide through this website or via any other means (such as over the telephone or in person) when you enquire about travel services, purchase travel services, sign up to our newsletter, request a brochure, leave a review or take part in a competition, etc.

This website is not intended for children and the only circumstances in which we collect data relating to children, is where you make a booking of travel services and you have children in your party.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### Who we are

Brooklyn Travel Limited comprises several brands, including:

- Canterbury Travel (London) Limited, trading as Canterbury Travel, Santa Holidays and Villa Select; and
- Stewart Travel Limited, trading as CruiseKings, GolfKings, My Canada Trips, SkiKings, Santa Claus Trips, Scotland's Cruise Centre, Stewart Travel and Unison Travel Club.

This privacy notice is issued on behalf of Brooklyn Travel Limited so when we mention "Brooklyn Travel Limited", "we", "us" or "our" in this privacy notice, we are referring to the relevant company within Brooklyn

Travel Limited which is responsible for processing your data. Brooklyn Travel Limited is the data controller and responsible for this website.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the data privacy manager using the details set out below.

## Contact details

Our full details are:

Full name of legal entity:	Brooklyn Travel Limited
Name or title of data privacy manager:	Data Privacy Manager
Email address:	privacy-policy@brooklyntravel.com
Postal address:	Brooklyn Travel Limited, 42-44 High Street, Northwood, Middlesex, HA6 1BL, United Kingdom

You have the right to make a complaint at any time with the supervisory authority that is responsible for the protection of personal data within the country where you live or work or in which you think a breach of data protection has taken place. We would appreciate the chance to deal with your concerns before you approach the authority, so please contact us by email or post in the first instance.

Customers in the **UK** can contact the Information Commissioners Office by telephone on 0303 123 1113. You can also use the live chat facility which is available through their website at [www.ico.org.uk](http://www.ico.org.uk)

Customers in **Ireland** should contact the Office of the Data Protection Commissioner in writing at The Office of The Data Protection Commissioner, Canal House, Station Road, Portarlington, Co Laois, Ireland, by telephone on 057 868 4800 or by email at [info@dataprotection.ie](mailto:info@dataprotection.ie)

## Changes to the privacy notice

This version was last updated on 22 May 2019 and historic versions can be obtained by contacting us.

## Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you provide to us should change during the course of your relationship with us.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- 2.1. This includes data relating specifically to your identity, such as your first name, last name, marital status, title, date of birth and gender. This includes data relating to how you may be contacted, such as your postal address, email address and telephone numbers.
- 2.2. This includes data relating to your means and methods of payment, such as your bank account and payment card details.
- 2.3. This includes data relating to the transactions you have carried out with us, such as details about payments to and from you and other details of products and services you have purchased from us.
- 2.4. This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

- 2.5. This includes information about how you use our website, products and services.
- 2.6. This includes your preferences in relation to whether or not you want to receive marketing from us and also your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy notice.

## Special Categories of Personal Data

Where necessary, we may collect the following special categories of personal data about you.

Details about your:

- dietary requirements which may disclose your religious or philosophical beliefs;
- health.

We collect and process the above data only where it is strictly necessary to do so in order to deliver the travel service that you have purchased, examples include where we need to book in-flight catering, arrange special airport assistance at the airport for you or apply trade union member discounts. Furthermore, we will only collect and process the above special categories of sensitive personal data where you have provided us with your explicit consent to do so.

You are not under any obligation to consent to us processing your sensitive personal data. However, without your consent, we won't be able to make the necessary arrangements to provide the travel services that you have booked or are attempting to book. As a result, if you do not provide your consent, we will be unable to proceed with your booking.

If you are happy to consent to our use of your sensitive personal data, you will also be able to withdraw your consent at any time. However, as this will prevent us from providing the travel service you have booked, we will be required to treat any withdrawal of consent as a cancellation of your booking and the cancellations in clause 3 of our [Booking Terms and Conditions](#) will become payable.

## If you fail to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

In other words, where we require details from you in order to provide you with your chosen travel services, if you do not provide us with the necessary details then we will not be able to provide the services you have booked or are attempting to book.

In this case, depending upon when you fail to provide the necessary data, we may either not be able to process your booking or we may have to cancel your booking, in which case we will treat this as a 'cancellation by you' in accordance with our [Booking Terms and Conditions](#). We will notify you if we are unable to process a booking or are required to cancel a booking for this reason.

# 3. How your personal data is collected

We use different methods to collect data from and about you including:

- 3.1. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - enquire about travel services;
  - make a booking of travel services;
  - subscribe to our newsletters or other publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- 3.2. As you interact with our website, we may automatically collect Technical Data about your equipment,

browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our [cookie policy](#) for further details.

3.3. We may receive personal data about you from various third parties as set out below:

A. Technical Data from the following parties:

- analytics providers [such as Google, based outside the EU];
- advertising networks [such as Google or Facebook, based outside the EU]; and
- search information providers [such as Google, based outside the EU];
- email platform provided [such as Mailchimp, based outside the EU].

B. Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as Traveltek based inside the EU].

C. Identity, Contact and Transaction Data from providers of research and survey services [such as SurveyMonkey based outside the EU].

D. Identity and Transaction Data from providers of review services [such as Feefo based inside the EU].

E. Identity and Contact Data from publicly available sources [such as Royal Mail, based inside the EU].

## 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or post. You have the right to withdraw consent to marketing at any time by [contacting us](#).

### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To record and respond to your enquiry	1. Identity; 2. Contact; 3. Transaction; 4. Marketing and Communications.	1. Performance of a contract with you; 2. Necessary for our legitimate interests (to develop our products/services and grow our business)

<p>To process and deliver your booking including:</p> <ol style="list-style-type: none"> <li>1. Provide you with travel services;</li> <li>2. Manage payments, fees and charges;</li> <li>3. Collect and recover money owed to us.</li> </ol>	<ol style="list-style-type: none"> <li>1. Identity;</li> <li>2. Contact;</li> <li>3. Financial;</li> <li>4. Transaction;</li> <li>5. Marketing and Communications.</li> </ol>	<ol style="list-style-type: none"> <li>1. Performance of a contract with you;</li> <li>2. Necessary for our legitimate interests (to recover debts due to us).</li> <li>3. Necessary for our legitimate interests (to develop our products/services and grow our business)</li> </ol>
<p>To manage our relationship with you which will include:</p> <ol style="list-style-type: none"> <li>1. Notifying you about changes to our terms or privacy policy;</li> <li>2. Asking you to leave a review or take a survey.</li> </ol>	<ol style="list-style-type: none"> <li>1. Identity;</li> <li>2. Contact;</li> <li>3. Profile;</li> <li>4. Marketing and Communications.</li> </ol>	<ol style="list-style-type: none"> <li>1. Performance of a contract with you;</li> <li>2. Necessary to comply with a legal obligation;</li> <li>3. Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).</li> <li>4. Necessary for our legitimate interests (to develop our products/services and grow our business)</li> </ol>
<p>To enable you to partake in a prize draw, competition or complete a survey.</p>	<ol style="list-style-type: none"> <li>1. Identity;</li> <li>2. Contact;</li> <li>3. Profile;</li> <li>4. Usage;</li> <li>5. Marketing and Communications.</li> </ol>	<ol style="list-style-type: none"> <li>1. Performance of a contract with you;</li> <li>2. Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).</li> </ol>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<ol style="list-style-type: none"> <li>1. Identity;</li> <li>2. Contact;</li> <li>3. Technical.</li> </ol>	<ol style="list-style-type: none"> <li>1. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);</li> <li>2. Necessary to comply with a legal obligation.</li> </ol>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ol style="list-style-type: none"> <li>1. Identity</li> <li>2. Contact</li> <li>3. Profile</li> <li>4. Usage</li> <li>5. Marketing and Communications</li> <li>6. Technical</li> </ol>	<p>Necessary for our legitimate interests (to study how customers use our products/ services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ol style="list-style-type: none"> <li>1. Technical</li> <li>2. Usage</li> </ol>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ol style="list-style-type: none"> <li>1. Identity</li> <li>2. Contact</li> <li>3. Technical</li> <li>4. Usage</li> <li>5. Profile</li> </ol>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

To monitor our communications with you including recording telephone calls	<ol style="list-style-type: none"> <li>1. Identity</li> <li>2. Contact</li> <li>3. Transaction</li> </ol>	Necessary for our legitimate interests (to check any instructions given to us, for training purposes, for crime prevention, to improve the quality of our customer service and to defend legal claims)
--	---	--

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

### Third-party marketing

We will not share your personal data outside Stewart Travel Limited for the purposes of marketing by third party companies. We may, however, pass your personal data onto third party companies for the purpose of them sending market research or review requests on our behalf.

### Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you, or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data that you have provided to us as a result of a purchase of travel services or other such transactions.

### Monitoring communications

We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [cookie policy](#).

### Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. How we disclose your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. When we transfer your data overseas

We share your personal data within the Company. This will involve transferring your data within the European Economic Area (EEA).

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Where you have made a booking of travel services which are located or otherwise due to be fulfilled outside the EEA, we are required and are permitted to transfer your personal data to the supplier of the services that you have purchased, outside the EEA in order to:

- Where we act as agent, to place you into a contract with the supplier and so that the supplier can fulfil the contract they have with you.
- Make your booking.

Where we are unable to rely on one of the safeguards outlined below when transferring data to those suppliers outside the EEA, we will rely on the derogation under Article 49 of the GDPR in order to transfer your personal data to countries outside the EEA (as the transfer relates to the performance of a contract for your benefit), and you hereby permit us to do so. You also acknowledge that where your personal data is transferred outside the EEA, controls on data protection may not be as wide as the legal requirements within the EEA.

For all other transfers of data that are unrelated to the provision of travel services to you, whenever your personal data is transferred outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 6.1. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
- 6.2. Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- 6.3. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

If you want further information on the specific mechanism used by us when transferring your personal data out of the EEA, please [contact us](#).

## 7. How we secure your data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. How long we retain your data for

## How long will you use my personal data for?

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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#).

In addition to the above, by law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

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. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- **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:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- 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
- 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.

## **How to exercise your rights**

If you wish to exercise any of the rights set out above please email us at [privacy-policy@brooklyntravel.com](mailto:privacy-policy@brooklyntravel.com) or write to: Data Privacy Manager, Brooklyn Travel Limited, 42-44 High Street, Northwood, Middlesex, HA6 1BL, United Kingdom.

## **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

# **10. Glossary**

## **Lawful Basis**

- **Legitimate Interest**

means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

- **Performance of Contract**

means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

- **Comply with a legal or regulatory obligation**

means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## **Third Parties**

- **Internal Third Parties**

Other companies in the Brooklyn Travel Limited Group [acting as joint controllers or processors] and who are based in countries inside the EEA and provide IT and system administration services and undertake leadership reporting.

- **External Third Parties**

1. Suppliers of travel services [acting as processors] based in countries inside the EEA and outside the EEA, who provide the travel services that make up any booking of travel services that you make with us, such as hoteliers, airlines, transport providers and ground handling agencies.
2. Service providers [acting as processors] based in countries inside the EEA and outside the EEA, who provide IT, database, email and system administration services.
3. Professional advisers [acting as processors or joint controllers] including lawyers, bankers, auditors and insurers based inside the EEA, who provide consultancy, banking, legal, insurance and accounting services.
4. HM Revenue & Customs, regulators and other authorities [acting as processors or joint controllers] based in the United Kingdom, who require reporting of processing activities in certain circumstances.
5. Market research companies and survey websites [acting as processors] based in countries inside the EEA and outside the EEA, who carry out market research, surveys and analysis on our behalf.
6. Review companies [acting as processors] based in countries inside the EEA and outside the EEA, who gather customer service and product reviews on our behalf.