



Introduction and background

The purpose of this policy is to outline how The Travel Network Group Limited has established measures to protect your privacy and information rights.

Your rights

We recognise that you have rights as a 'data subject', and that we have an obligation to uphold these.

This privacy notice aims to remind you of your rights, and outlines how we maintain these rights. In particular, it outlines:

- How we collect and process your information
- Why we do this
- How you can exercise your rights;
- Who to contact in the event you're unhappy with our performance.

Depending on why we have collected your information, your information rights could include:

Right	Explanation
Right to be informed	This encompasses the obligation for us to be transparent in how we collect and use your personal data.
Right of access	You have the right to access your personal data and supplementary information.
Right to rectification	If the information we hold on you is inaccurate or incomplete, you can request we correct this.
Right to erasure	You can request we delete or remove personal data where there is no compelling reason us to continue processing
Right to restrict processing	You have the right to request we cease processing your data, if: <ul style="list-style-type: none"> • You consider it inaccurate or incomplete; • Where you object to processing and we are considering whether we still have a legitimate interest to process it. • Where we don't need the data for the original reason we collected it, but may need it to support a legal claim
Right to data portability	<ul style="list-style-type: none"> • Where you have consented to our processing your data, or where the processing is necessary for us to deliver a contract, you can request a copy of that data be provided to a third party in electronic form.
Right to object	You have the right to object to our processing under certain circumstances. For example, you can object to: <ul style="list-style-type: none"> • direct marketing (including profiling); and • processing for purposes of scientific/historical research and statistics
Rights relating to automated decision making including profiling	Where we apply automated decision making, we must

	<ul style="list-style-type: none"> • give you information about the processing; • introduce simple ways for you to request human intervention or challenge a decision; • carry out regular checks to make sure that our systems are working as intended <p>Information related to automated decision making is contained later in this notice.</p>
--	---

Information we collect

Please find below a summary of the information we collect and how we use this to deliver services to you.

Business function	Information we collect	Why we collect this
Risk	In the event of closure, we take customer details relating to the booking made by the passenger so we can administer the booking.	This is necessary for us to perform a contract with our members.
Operations	<p>We support our members in getting appropriate insurance cover for their customer bookings. This may involve the member disclosing personal information to us.</p> <p>We support some of our members in processing payments from their customers. We will obtain personal information and payment details to support this.</p> <p>We can receive complaints from the customers of members, which may hold personal information.</p> <p>In each of the above, the information would typically include name, address and other contact details. It may include other information (for example, payment details or date of birth) if these are disclosed by the customer.</p>	These details are necessary for us to perform the contract we have entered in to with our members. These obligations include processing payments and administering events relating to the booking (such as the failure or closure of a member or complaints)
Honeycomb	We collect the personal information needed to arrange a booking or the customer, including name, address, date of birth. We may also collect passport details if these are needed to support the bookings	These details are necessary for us to perform the contract we have entered in to with our members (i.e. to book the requested travel)
Finance	We will hold personal details relating to the bookings we administer and payments we process as a part of our internal finance function. This information will include name, address, payment details and on occasion other information such as date of birth.	These details are necessary for us to operate as a company and support our statutory documentation requirements.
Cruise club	We collect the personal information needed to arrange a booking or the customer, including name, address, date of birth. We may also collect passport details if these are needed to support the bookings	These details are necessary for us to perform the contract we have entered in to with our members (i.e. to book the requested travel)
Marketing	We process the personal details provided to us by members to support their marketing initiatives.	These details are necessary for us to perform the contract we

	This will include name, address and other contact details (for example email address and phone number, depending on the campaign).	have entered in to with our members (i.e. to support the marketing initiative they have requested we perform on their behalf)
ITE	We collect the personal information needed to arrange a booking or the customer, including name, address, date of birth. We may also collect passport details if these are needed to support the bookings	These details are necessary for us to perform the contract we have entered in to with our members (i.e. to book the requested travel)
Trustees	We hold the personal data of our client's customers to ensure appropriate financial protection for the customer is in place.	These details are necessary for us to perform the contract we have entered in to with our members
Membership	We hold our member information and share this with our business partners to help members access business partner services.	These details are a component of the service we offer members, and we consider it in the mutual legitimate interest of both members and business partners to share the commercial contact information.

Transfer of data

Please provide details of who information is shared with and why, including transfers overseas, from the documentation. The table above can be replicated if necessary, with an additional column on 'transfer overseas'

We work with a number of service providers in the course of providing services to you. These are outlined below:

- Tasker
- Our insurance company in the event of a claim or to allow for cover to be provided.
- CAA only
- Our legal representatives
- Aggregators such as Inspiretec & Paxport
- The suppliers of services we facilitate on your behalf, such as airlines, accommodation providers, tour operators, cruise operators and local agents.
- Business partners, to allow you access to the services we have negotiated on your behalf.
- Worldpay, Banks and other payment providers.
- Third Party Supplier (Mailchimp Email System) – where we are asked to support a members campaign.
- Third Party SMS Provider, where we are asked to support a member campaign
- Royal Mail, to support posting materials.
- Propak Printers, to print brochures and labels.
- WuFoo
- Suppliers supporting the events you have subscribed to (for example, caterers)

Retention of data

The Travel Network Group Limited retains information for seven (7) years from our point of last contact. We hold this information to support our legal and regulatory requirements. If you object to this retention, please contact us – details provided in the 'Contact' section.

Securing your information

Information and data security are important to us. The Travel Network Group Limited applies technical and organisational security measures in line with industry good practices.

How we use cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website

Contact details

We recognise that you may have questions on how we process and/or store your data, or may want to change either the data we hold on you or how we communicate with you in the future.

If you have given consent for processing, you are free to withdraw that consent. To let us know this is the case please contact us at: The Travel Network Group, 2 Crown Square, Woking, Surrey, GU21 6HR

If you have any questions in respect of this notice, or would like to exercise your rights as a data subject (for example, to correct data or to exercise your right to access):

- The Travel Network Group Limited, as data controller, can be contacted as follows:
Enquiries@traveltrust.co.uk or at The Travel Network Group, 2 Crown Square, Woking, Surrey, GU21 6HR
- Vim Vithaldas can be contacted as follows Vim.Vithaldas@thetravelnetworkgroup.co.uk or at The Travel Network Group, 2 Crown Square, Woking, Surrey, GU21 6HR

If you are unhappy that we have responded to your query adequately, or if you have a further complaint, The Information Commissioner's Office can be contacted on:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF