



NEWMARKET BATTLEFIELD TOURS DATA PROTECTION POLICY

Newmarket Battlefield Tours will capture, and store information so requested services can be provided. All personal information will be processed, protected, and disposed of in accordance with the UK General Data Protection Regulations (GDPR) and the Data Protection Act 2018, and will only be used to deliver or improve our services. We will not disclose any personal information to any other third parties unless required to do so by law or in the necessary preparation and delivery of services for you.

On 28 June 2021, the EU approved adequacy decisions for the EU GDPR and the Law Enforcement Directive (LED). This means data can continue to flow between the UK and the EU as it did before, in most circumstances.

Privacy Policy & Cookies

How we collect and store your personal data

What is the purpose of this privacy policy?

This Data Protection Policy is to tell you what personal data we collect from you and why and what we will do with this data. It also tells you about some of the key rights which you have under data protection laws. You and your personal data are protected by the UK GDPR and a new UK Data Protection Act 2018. In this policy, we refer to this legislation as data protection laws.

We will only process your personal data notified to or agreed by you or as we are otherwise permitted to do in accordance with data protection laws.

When we refer to “you” in this policy, we mean every person who communicates with us in respect of an enquiry, a booking request or for any other reason and all persons for whom a booking or booking request is made.

For the purposes of data protection laws, Newmarket Battlefield Tours are data controllers for the personal data we process. In this privacy policy, “we”, “us” and “our” means Newmarket Battlefield Tours.

What is my personal data and what do you mean by process?

When we refer to personal data, we mean any information which relates to an identified or identifiable individual.

Where we refer to process or processing, we mean anything which we may do with your personal data including collecting, storing, using, disclosing to third parties, and erasing it.

What personal data will we collect from you and why?

To respond to an enquiry, administer and fulfil your booking or send you a brochure or other promotional material, we need to process the personal data we obtain from you.

Where you wish to make a booking, the personal data we need to collect, and process is likely to include;

- names and dates of birth of all persons travelling
- contact details (such as telephone number, postal and e-mail addresses) of the person making the booking
- passport information of all persons travelling
- travel insurance details for all persons travelling
- dietary information where applicable
- emergency UK contact / next of kin details (names and telephone numbers) for all persons travelling
- credit/ debit card or other payment information for the person making the booking
- information in respect of any medical condition, disability or reduced mobility which may affect you or anyone travelling with you – this comes within special categories of personal data (see below)



For an enquiry, the personal data we will need to process is likely to include the name and contact details of the person making the enquiry.

For a booking or booking enquiry, we will process your personal data (other than any data which comes within special categories of personal data - see below) on the basis that this is necessary for the performance of your contract with us or to enable us to take steps at your request prior to your entering into a contract with us. We may also need to do so to comply with a legal obligation to which we are subject or to protect your vital interests (for example, in an emergency).

If you wish to receive brochures or other promotional material from us, we will need your name and the contact details applicable to the form of communication you have consented to. For example, if you wish to receive information by e-mail, we will need your e-mail address.

What are special categories of personal data?

Personal data which concerns your health, or which reveals your racial or ethnic origin, religious beliefs or sexual orientation are special categories of personal data. Other information also comes within special categories, but this is unlikely to be relevant to the booking and provision of travel arrangements.

The processing of special categories of personal data requires your explicit consent.

Accordingly, information concerning any disability, medical condition, restricted mobility, or other health related issue as well as dietary restrictions which disclose your religious beliefs, or any health concern are special categories of personal data. We will ask for your consent to our processing this information at the time you make your booking or your booking enquiry.

Who may we provide your personal data to?

Where you make a booking, necessary personal data will be passed on to the relevant suppliers of your chosen arrangements, together with any other third party who needs this information so that we can arrange for your holiday to be provided.

Depending on the arrangements booked, suppliers and other third parties may include the following.

- Transport operators e.g. airlines, ferry companies, taxi firms
- Hotels and the providers of other forms of accommodation
- Specialist guides
- Excursion and activity operators
- Travel insurance providers
- Credit card companies / banks in respect of payments

The information may also be provided to government / public authorities such as customs or immigration if required by them, or as required by law.

Where will we process your personal data?

Your personal data may be processed within the UK and/or any other country(ies) of the European Economic Area (EEA). EEA countries are all member states of the European Union together with Norway, Iceland, and Liechtenstein.

We may also process personal data outside the EEA. Data protection laws may not be as strong outside the EEA as they are in the EEA. Personal data will not be transferred to a country outside the EEA unless (1) the country to which it is transferred is one which the European Commission considers to provide an adequate level of data protection or (2) the personal data is transferred to a company which is required by our contract with them only to deal with the data in accordance with our instructions and to maintain appropriate security to protect the personal data which we are satisfied they have or (3) we are obliged to provide the personal data to a government / public authority in order to provide your holiday.

How do we protect your personal data?

We take appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data, which is



appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures.

Can we use your personal data to send you information about our holidays or other services in the future?

We will only retain and use your personal data for marketing purposes where you have specifically consented to this or we are legally permitted to do so (including as set out below).

We may send you e-mail marketing where we comply with the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR). PECR permits us to e-mail you information about the travel services we offer where you have previously provided us with your e-mail address during entering a contract with us for holiday / travel arrangements or negotiations for such arrangements and we wish to e-mail you marketing material about our similar services or products. You will of course be given the opportunity to opt out of receiving such e-mail marketing communications when you first provide us with your e-mail address and whenever we send you any e-mail marketing.

Where you have previously requested or agreed to receive information about our travel services from us by post, we may continue to send you such information in the same way until you ask us not to (which you can do by telephone, e-mail, or post). Everything we send you will tell what you should do if you no longer wish to hear from us. We will send you this information as this is necessary for the purposes of our legitimate interests in communicating with you unless it is or becomes clear that our interests are overridden by your interests or fundamental rights and freedoms in which case, we will cease communicating with you.

You may provide your consent to receiving marketing information from us by opting to receive marketing material either on-line or by telephone. You may also choose in what ways you are happy to receive communications from us. You may, for example, be happy to receive information and offers by post and e-mail but not by telephone.

Can you withdraw your consent to our processing your personal data?

Yes, you can withdraw your consent to receiving marketing material or other communications from us, either generally or in any way, at any time by e-mailing us at nbt19@yahoo.com. Alternatively, you can telephone us on 07377629801.

How can you find out what information we are holding about you?

You are entitled to ask us (by letter or e-mail) what personal data of yours is being held or processed, for what purpose and to whom it may be or has been disclosed. No fee will be charged for responding to this request unless it is obviously unfounded or excessive or we have previously provided the same information. We promise to respond to your request without delay and in any event within one month unless the request is complex, or you have made numerous requests in which case we may be able to extend our response time by a further two months.

What should you do if the personal data we are holding is inaccurate, out of date or incomplete?

If you believe this is the case, please tell us by e-mail as soon as possible. We will rectify the problem within one month or within three months if the rectification request is complex.

How long can we retain and process your personal data?

We will not process your personal data in a form which enables you to be personally identified for any longer than is necessary to fulfil the purpose for which it was originally collected or for any other legitimate business purpose.

Where your personal data has been provided for the holiday arrangements or other services you have contracted, we are entitled to retain this data for a period of up to six years after those arrangements have been completed. In certain limited circumstances, we may be able to retain it for a longer period.

If you have consented to receiving marketing communications from us, we may continue to use your personal data for this purpose until you withdraw your consent or otherwise for as long as we reasonably consider your consent remains valid and effective.



Can you ask us to delete your personal data?

Yes, you can ask us to erase your personal data in certain circumstances, for example where you have withdrawn your consent to further marketing material where the data in question has only been processed for this purpose. However, this is not always the case. Please see the previous paragraph for further information on the period we may retain personal data.

Can this privacy policy be changed?

Yes, from time to time we may need to make changes to this privacy policy. These may be required because of changes in data protection laws or in the guidance issued by regulators such as the Information Commissioner's Office (which is usually referred to as the ICO) or where we make changes to our procedures. The latest version of this privacy policy can be found on our website at, www.newmarketbattlefieldtours.co.uk

What should I do if I have a complaint about the processing of my personal data?

If you have any complaint about the way in which your personal data has been dealt with, please let us know by e-mail to nbt19@yahoo.com. We will investigate and respond to you as soon as we reasonably can. If you remain dissatisfied, you may complain to the Information Commissioner's Office. For further details, see, www.ico.org.uk

COOKIES

What are cookies and how do we use them?

Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to originating website on each subsequent visit or to another website that recognises that cookie.

This Site uses cookies to distinguish you from other users. Some of these cookies are essential to make this website work properly, allowing you to make your booking and enabling us to fulfil your purchase request. Other types of cookies help us to provide you with a good experience when you browse our website, allow us to improve our website or the way we provide our services to customers.

Cookies can be divided into four categories: strictly necessary cookies, performance cookies, functionality cookies and advertising cookies.

Strictly necessary cookies - these cookies are essential to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.

Performance cookies - these cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

Functionality cookies - these cookies allow the website to remember choices you make (such as your username, language, or the country you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts, and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Advertising cookies - These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other

www.newmarketbattlefieldtours.co.uk



organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.
We use cookies in each of the above categories.

Can I opt out of cookies?

Yes, except where the cookie is strictly necessary to provide the services which you have requested. Consent is not required for the use of these cookies and we simply cannot provide these services without them. You can opt out of cookies which are not strictly necessary. However, please remember that performance cookies only collect information about the website usage which is anonymous and functionality cookies remember the choices you make to improve your experience of our website. Advertising cookies collect information about your browsing habits to enable us to target our advertising and make it more relevant for you and your interests

You can set your browser to reject cookies or you can delete them yourself. You can also adjust your browser settings to your preferred level of protection. You can do so at any time by accessing the preference panels from your browser's main menu (usually found under 'Edit', 'Tools' or 'Options'). You can also find out more information about how cookies work and how to disable them here. However, if you choose to remove cookies parts of the Site may not work properly or your use of the Site may be impaired.

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