

Lay My Hat Travel is committed to protecting the privacy of everybody that books with us. This Privacy Notice is our way of being transparent to you on how we use your personal data when you enquire and book with us and demonstrates our fair processing practices.

CATEGORIES OF PERSONAL DATA WE PROCESS

In order for us to facilitate your booking, we require the following personal information about you:

- Name as per passport (including middle names)
- Address
- Phone Number
- Payment Information
- Nationality
- Place of birth
- Passport Number
- Passport Issue/Expiry Date
- Date of Birth
- Place of birth
- Email address
- Passport (copy)
- Emergency contact name, contact details and relationship

We are also obligated to obtain personal data of a special category such as contagious disease vaccination information, health and medical information and information that could reveal your race or ethnicity.

We request the name and phone number of an emergency contact and their relationship to you. We realise that your emergency contact may not have heard of Lay My Hat Travel previously, and so we ask you to inform them that you will be sharing their information with us. If they have any queries they can contact us using the details we have provided in this notice.

You are required to provide the listed personal information to us before we can confirm your booking. If you fail to provide us with this information then you will not be able to book your holiday.

For enquiries, we can collect less information, which will include name and contact details as a minimum.

RECEIVING DATA THROUGH THIRD-PARTIES

We are proud to have a wide network of travel partners. If you have concerns that we may have received your information in error or would like to find out where we have received your information from, please contact us using the details in this notice.

PURPOSES OF PROCESSING YOUR PERSONAL DATA AND LEGAL BASIS

We process your data for a variety of purposes. As a Travel Agent, we process your personal data to facilitate the booking and provisioning of your holiday and we have outlined these purposes in the table below. It will be beneficial for you to review the privacy notices of the third parties we book you with to understand how they will process your data. We always process personal data with a legal basis and the table below demonstrates our intended purposes and the legal basis we use to process your data.

Legitimate Interests

Legitimate Interests Consent

Contractual obligation with explicit consent.

Your explicit consent is obtained through the provision of this information from yourself directly or the third party passing us this information to us. You can withdraw or decline consent, however without knowing your nationality we will not be able to book your holiday, and without knowing any medical conditions we could not ensure adequate medical care or provision.

Contractual Obligation

Legal Basis

Purpose

Amending your booking at your request

Making your booking, which can include package holidays and arranging cruise, flights, hotels, rail, and transfers

Contacting you with information relating to your booking

Contacting your emergency contact

Enquiries

Using aggregated data to identify trends in bookings, to improve our services and for business reporting purposes

Contacting you with information on additional services relating to your holiday. For example: information on excursions, upgrades and special events

Contacting you via email and post about Fred. Olsen Travel offers, products, and holidays

(we will always give the option to opt-out of this at the point we capture your information and in every subsequent communication with you)

Legitimate Interests ('soft opt-in' & opt-out)

Market research and customer segmentation

Call recording

Vaccination information, shielding and/or clinically extremely vulnerable status

Obtaining medical information and information that can reveal race or ethnicity

Processing feedback and complaints

RECIPIENTS OF YOUR INFORMATION

We share information for a variety of reasons in order for us to deliver our services, to enhance, improve, develop and promote our services, and otherwise conduct our business. The list below provides information on the types of third parties that we share information with. It is challenging to name specifically all the third parties that we will transfer data to and so we have provided categories of recipients for you instead.

- Package holiday organisers;
- Tailor-made holiday providers; where flight/hotel/transfers are organised by a single company, we will inform you of the company we will transfer your data to when booking those services,
- Airlines: we will inform you of the airline company we will transfer your data to when booking,
- Hoteliers: we will inform you of the airline company we will transfer your data to when booking,
- Rail operators; we will inform you of the rail company we will transfer your data to when booking the train journey,
- Other ancillary service providers; we will inform you of the ancillary service provider we will transfer your data to when booking such a service (for example car hire)
- Specialist service providers; in the event you require a specialist service e.g. medical services

- Health service providers, including NHS Agencies, such as GPs, hospitals and ambulance services
- Government and public agencies, such the Department of Health and Public Health agencies
- Mailing houses: for brochures and other mailers
- Selected third parties and service providers, including marketing agencies, marketing research agencies, PR agencies and data hosting service providers, so that we can develop, enhance and promote our services and provide you with information and marketing messages about products and services you may enjoy
- Our affiliates and companies in the Fred. Olsen family of companies, who may use your information in the same way as we can under this notice
- Third parties as legally required to comply with law and law enforcement, to enforce our terms, to protect the security or integrity of our services, and to exercise or protect the rights, property, and safety of us and other third-parties.

We book travel and holiday arrangements for destinations across the world. When liaising with a travel or accommodation provider within Europe, the EEA and countries on the European Commission's data protection 'adequacy' list, we use the countries' own data protection regulation as the safeguard for your data over and above the technical and organisational measures we have put in place to secure your data when transferring to them. For recipients outside of this list, we use either our standard contractual clauses with a provider where applicable, or the fulfilment of our contract with you as the appropriate safeguard.

We operate under licence from Fred. Olsen Travel and use their booking and payment systems and bonding facilities to make your booking. Fred. Olsen Travel do not use your data for any purpose other than helping to facilitate your booking with us

We will never sell your data to any third party.

RETENTION OF YOUR PERSONAL DATA

We retain your personal data for only as long as it is necessary for the uses set out in this Privacy Notice and/or to meet legal, regulatory, and financial reporting requirements.

This includes the data relating to your booking for a minimum of 3 years, which is a requirement for legal purposes.

Information relating to the monetary value of your booking will be retained for a minimum of 6 years from the date of the transaction, in order to comply with statutory financial reporting requirements.

We retain your contact details until such time where you no longer wish to be contacted by Lay My Hat Travel.

These retention periods are not inclusive of how long the recipients of your personal information may retain your data.

YOUR RIGHTS

We are always happy to fulfil any one of your rights wherever possible. Your rights with respect to the personal data that we process on you are:

- Right to information on how your data is processed
- Right of access to the personal data we hold on you

- Right to rectify any inaccurate data we process on you
- Right to object to us processing your personal data
- Right to erasure of your data
- Right to data portability
- Right to lodge a complaint with a data protection regulator
- Right not to be subject to automated decision making

You can invoke any of your rights at any time using the contact details listed in this Notice, subject to us having to keep the data for legitimate business or legal reasons . Please be aware that we can ask for identification documents to confirm we are disclosing information to the correct person. If you elect a representative to invoke these rights on your behalf we will request that the representative can demonstrate they have the authority to act on your behalf and their identity.

We do not conduct any automated decision making or profiling when you make a booking with us.

DATA PROTECTION AND COVID-19

This explains how Lay My Hat Travel (as Data Controller) may use your personal data, specifically in relation to the Covid-19 (Coronavirus) Pandemic and to support the NHS Test & Trace scheme in England and NHS Scotland's Test and Protect service.

To operate safely and effectively, we may need to ask you for sensitive personal information that you have not already supplied, or use data you have already provided, including whether you have any underlying illnesses or are what is classed as vulnerable.

If we already hold information regarding vulnerability, we may share this for vital health reasons, emergency planning purposes and to protect your vital interests by sharing with services both inside and outside Lay My Hat Travel.

YOUR PERSONAL DATA

Personal data relates to a living individual who can be identified from that data. Some of your personal data is classed as 'special category personal data' because this information is more sensitive e.g. health information, ethnicity and religion etc.

Why we may need to share your personal data

We may share your information with other public authorities, emergency services, and other stakeholders as necessary, and only when necessary, in a proportionate and secure manner. Contact with you to obtain consent before sharing will not be required for all the reasons described in this notice. Please be assured that protection of personal data remains a priority at this time after the health and safety of everyone.

We will only share your personal information where the law allows, and we always aim to share the minimum data necessary to achieve the purpose required. Further, the information will only be used for the purposes listed and retained for limited specific times.

Data protection laws allow us to share information for a wide variety of reasons. These are known as our 'legal bases to process data'.

Data protection laws are written to facilitate valid information sharing, especially in times of emergency which often requires more collaborative working. The legal bases for processing data at Lay My Hat Travel while Covid-19 continues to present significant health risks are:

- Protect the public
- Satisfy legal and regulatory requirements
- Provide extra support for individuals with a disability or medical condition
- Safeguard children and individuals at risk

Lay My Hat Travel will apply the following sections of the General Data Protection Regulation and Data Protection Act 2018 (other elements may be applied dependent upon emerging events):

GENERAL DATA PROTECTION REGULATION

Article 6 – Lawfulness of Processing

- Article 6.1(c) - processing is necessary for compliance with a legal obligation to which the controller is subject.
- Article 6.1(d) - processing is necessary in order to protect the vital interests of the data subject or of another natural (living) person.

Article 9 – Processing of special categories of personal data

- Article 9.2(c) - processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent
- Article 9.2(g) - processing is necessary for reasons of substantial public interest
- Article 9.2(h) - processing is necessary for the purposes of preventative or occupational medicine, where it is necessary for the provision of social care, the provision of health care or treatment or for the management of a health or social care system
- Article 9.2(i) - processing is necessary for reasons of public interest in the area of public health, such as protecting against cross-border threats to health or ensuring high standards of quality and safety of health care

DATA PROTECTION ACT 2018

SCHEDULE 1, (Special categories of Personal Data), Part 1 Conditions relating to Employment, Health and Research etc

This condition is met if the processing

- a) Is necessary for the reasons of public interest in the area of public health and
- b) Is carried out -
 - i. by or under the responsibility of a health professional, or

II. by another person who in the circumstances owes a duty of confidentiality under an enactment or rule of law

SCHEDULE 1, (Special categories of Personal Data), Part 2, Substantial Public Interest Conditions

Paragraph 16, Support for individuals with a disability or medical condition

This condition is met if the processing

d) can reasonably be carried out without the consent of the data subject

e) is necessary for reasons of substantial public interest

(1) This condition is met if the processing is

a) necessary for the purposes of

I. protecting an individual from neglect or physical, mental or emotional harm, or

II. protecting the physical, mental or emotional well-being of an individual,

b) the individual is

I. aged under 18, or

II. aged 18 or over and at risk,

c) the processing is carried out without the consent of the data subject for one of the reasons listed in sub-paragraph (2), and

d) the processing is necessary for reasons of substantial public interest.

(2) The reasons mentioned in sub-paragraph (1) c) are —

a) in the circumstances, consent to the processing cannot be given by the data subject

b) in the circumstances, the controller cannot reasonably be expected to obtain the consent of the data subject to the processing

(3) For the purposes of this paragraph, an individual aged 18 or over is "at risk" if the controller has reasonable cause to suspect that the individual —

a) has needs for care and support,

b) is experiencing, or at risk of, neglect or physical, mental or emotional harm, and

c) as a result of those needs is unable to protect himself or herself against the neglect or harm or the risk of it.

YOUR RIGHTS

You have several rights with respect to your personal data. You can find full details on the Information Commissioner's Office website. Any requests regarding your rights should be submitted to the Data Protection Officer. There may be a delay in responding fully to all requests within one calendar month, but we will strive to keep requestors updated with the progress of their request.

DATA CONTROLLER

Lay My Hat Travel Ltd is a data controller. We collect and process data for a number of purposes outlined in this Notice. If you ever need to contact us you can by using the details below:

Address: 132b The Street, Rushmere St. Andrew, Ipswich, United Kingdom, IP5 1DH

Phone: +44 (0) 77710233014

If you have a specific query relating to how we process your personal data you can contact our Data Protection Officer on:

Email: enquiries@laymyhattravel.com