

Privacy Policy

1. Policy statement

This privacy policy (together with our website terms & conditions and any other documents referred to within this policy) describes how **Xpert Travel trading division of Barrhead Travel** collects and uses the personal information you provide ("personal data") to us through our website or offline.

We have a legal duty to protect any personal data that we collect from you as a "controller" of that personal data under the data protection legislation. Barrhead Travel safeguards your personal data and maintains security standards to prevent any unauthorised access.

If you have any questions regarding this privacy policy or how we use your personal data, please contact us through our website at www.barrheadtravel.co.uk, by email at gdpr@barrheadtravel.co.uk, or by letter to our registered office at FOA Data Processing Officer, Barrhead Travel Service Limited, 190-194 Main Street, Barrhead, Glasgow, G78 1SL.

2. What do we use your information 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.

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 fulfil your booking, including:
 - 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 notify you of any changes to your booking or our services;
- to allow us to consider your comments, questions and suggestions and respond, if necessary; and
- to enable or facilitate the exercise of our rights under our website terms and conditions and booking terms and conditions.

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; and
- 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.

We may also be required to process your personal data to comply with our legal obligations under ABTA membership / CAA ATOL requirements.

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

3. What information do we collect?

We may collect the following personal data from you through our website / App:

- **contact information**, such as name, email address, mailing address, phone number;
- **billing information**, such as credit card number and billing address;
- **usage activity**, about how you interact with us such as purchase history, what content you viewed, and which areas of our website / App you visited;
- **device information**, such as your IP address, browser type, referring / exit pages, operating system, mobile device ID, device type, cookies and mobile service carrier;
- **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];
- **information about your business**, such as company name, company size and business type; and
- **demographic information**, such as household income, age, education, gender, interests and post code.

However, you may visit our website anonymously by changing the settings on your browser.

4. Do we disclose any information to outside parties?

Acting as a travel agent, we will pass your personal data onto any third-party tour operator / travel company as necessary to complete your booking.

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 Barrhead Travel, 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 Barrhead Travel's 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.

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 supplier whom you are booking with.

5. How do we protect your information?

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.

6. How long do we keep your information?

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 www.barrheadtravel.co.uk. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

7. Third party links

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

Other websites have their own privacy policies and when clicking through to another website / App we strongly recommend reading its privacy policy, especially as the way in which personal data may be collected from you may vary.

Please note that links to these external websites / Apps are not covered by our ABTA membership, ATOL membership or any of our other memberships / associations. 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 Barrhead Travel or its associated brands.

8. Social Networks

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.

9. Other Information

Our Forum offers publicly accessible blogs or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your personal data from our blog or community forum, contact us at gdpr@barrheadtravel.co.uk. In some cases, we may not be able to remove your personal data, in which case we will let you know if we are unable to do so.

10. Your rights

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.
- the right to obtain and reuse the personal data that we hold about you for your own purposes in certain circumstances;
- where we undertake any automated decision-making and profiling, you have certain rights in relation to such processing

If you wish to exercise any of the above rights, please contact us on gdpr@barrheadtravel.co.uk 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

11. Online and offline privacy policy.

This privacy policy applies to personal data collected through our website and offline.

12. Terms and conditions

Please also visit our Terms and Conditions section establishing the use, disclaimers, and limitations of liability governing the use of our website at www.barrheadtravel.co.uk

13. Changes to our privacy policy

If we decide to change our privacy policy, we will post those changes on this page, and / or update the privacy policy modification date below.

This policy was last modified on 31 August 2018