

This is the privacy notice of Booking Protect Limited. In this document, "we", "our", or "us" refer to Booking Protect Limited.

We are company number 8968744 registered in England.

Our registered office is at Romero House, 8 Airport West, Leeds, LS19 7ZA.

## Introduction

This privacy notice aims to inform you about how we collect and process any information that we collect from you, or that you provide to us. It covers information that could identify you ("Personal Data") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

We are committed to protecting your privacy and the confidentiality of your personal information. Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.

Our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your Personal Data. We do this now by outlining your rights and by requesting that you read the information provided at <http://www.knowyourprivacyrights.org>

Except as set out below, we do not share, or sell, or disclose to a third party, any information we collect.

## How we collect and use data

We may collect, use, store and transfer different kinds of Personal Data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, date of birth, and other identifiers that you may have provided at some time.

Your contact information includes information such as address, email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

Your financial data includes information such as your bank account and payment details.

Technical data includes your internet protocol (IP) address, 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.

Your profile includes information such as your username and password.

Marketing data includes your preferences in receiving marketing from us; communication preferences; responses and actions in relation to your use of our services.

We may aggregate anonymous data such as statistical or demographic data for any purpose. Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your Personal Data but is not considered personal information in law because it does not reveal your identity.

For example, we may aggregate profile data to assess interest in a product or service.

However, if we combine or connect aggregated data with your personal information so that it can identify you in any way, we treat the combined data as personal information and it will be used in accordance with this privacy notice.

## **Special personal information**

Special personal information is data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.

It also includes information about criminal convictions and offences.

We may collect some special personal information about you if there is a lawful basis on which to do so.

## The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

## Information we process because we have a contractual obligation with you

When you create an account in our portal or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our obligations under that contract we must process the information you give us. Some of this information may be personal information.

We may use it to:

- verify your identity for security purposes
- provide you with our services

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

## Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or ask us to provide you more information about our business, including our products and services, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

If you have given us explicit permission to do so, we may from time to time pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent, or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us [data@bookingprotect.com](mailto:data@bookingprotect.com). However, if you do so, you may not be able to use our website or our services further.

## Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of refunds
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage refunds
- protecting your interests where we believe we have a duty to do so

## Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order or retain some personal data for the prevention of fraud and money laundering.

This may include your personal information.

## Information relating to refund payments

We store information about your bank account or other means of payment that you provide us with in order to issue refund payments.

We also store it to help us prevent fraud and money laundering.

We will not use your payment information to request funds from you. We will only use them to issue a refund payment to you.

We take the following measures to protect your payment information:

- We keep your payment information encrypted on our servers.
- Access to your payment information is restricted to authorised staff only.

We automatically delete your payment information 60 days after the refund has been issued.

## Communicating with us

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

## Use of information we collect through automated systems when you visit our website

### Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you will not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in to our website
- to record your answers to surveys and questionnaires on our site while you complete them

## Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

## Disclosure and sharing of your information

### Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

### Information we share with a third party

In order to fulfil our obligations under any contract for services we will need to share some of your data with third parties. These third parties include:

Google Analytics

We use google analytics to monitor the performance of our web site

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Saleforce/Pardot	We use Salesforce with Pardot as our CRM and sales tool.
Call recording system	TIM (Tri Line) to record all telephone conversations
Banking Arrangements	We use the 'Bankline' portal provided by our Bankers National Westminster Bank Ltd, AccessOptima provided by Citizens Bank and TransferWise to manage refund payments.
Amazon Web Services (AWS)	We store and process information using AWS.
Microsoft	We use Microsoft for our email communications and to process data for reporting purposes.
LiveChat Inc	We use LiveChat to provide an instant messaging system to our customers.
SolarWinds Worldwide, LLC	We use SolarWinds Loggly platform to record transactional, operational and error logs.
MongoDB Inc	We use MongoDB to store and process information using the AWS infrastructure.

In all cases we seek to minimise the amount of Personal Data shared and in some cases anonymise this. It is essential, however, that we can identify you quickly and easily so information shared may be identifiable as your Personal Data. We will not share your personal information in any other circumstances than those necessary for the provision of service to you or where we are required to do so by law.

## Data may be processed outside the European Union

We may transfer your information to other countries including those located outside the European Economic Area. If we do this, we will seek to ensure that anyone to whom we pass it provides an adequate level of protection.

## Your rights and control over your own information

### Right to be informed

You have the right to know and understand how we record and use your Personal Data. We aim to do this through this privacy policy. If you have any further questions you can contact us at any time.

### Right to access

At any time you may review or update personally identifiable information that we hold about you.

After receiving the request, we will tell you when we expect to provide you with the information.

### Right to removal of your information

If you wish to have any information we hold on you removed from our records you should contact us to make your request. This may limit the service we can provide to you. We may not always be able to comply with a request for deletion, but you can ask us to cease processing your data

## Right to have your personal information rectified

You have the right to request that personal information we hold about you is rectified. It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes. If any information we hold about you is inaccurate or incomplete, please inform us and this will be rectified.

## Right to restrict processing

You have the right to request that the use of your Personal Data is restricted to certain activities. Please contact us to request changes.

## Right to data portability

You have the right to request a copy of your personal information for you to reuse with other businesses or providers. Please contact us to request a copy of your Personal Data.

## Right to object

You have the right to object to direct marketing (including profiling), processing based on legitimate interest, and purposes of scientific/historical research and statistics. Please contact us to request changes.

If you wish to exercise any of your rights as described above, please contact us at [data@bookingprotect.com](mailto:data@bookingprotect.com).

## How you can complain

If you are not happy with our privacy policy or if you have any complaint, then you should tell us.

If a dispute is not settled, then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

## Retention period for Personal Data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities;
- to support a claim or defence in court.

## Review of this privacy policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our services. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.