



PRIVACY NOTICE

YOUR PERSONAL INFORMATION AND WHAT WE DO WITH IT

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1. Who We Are and How to Contact Us

Bessway Travel Ltd of Compound 1, Magnet Road, East Lane Business Park, Wembley, Middlesex HA9 7RG is a data controller of your personal information. This means information that is about you or from which we can identify you. This privacy notice describes how we deal with your personal information. We are the data controller of this information under relevant data protection laws because in the context of our business relationship with you we decide how and why it is processed in the ways explained in this privacy policy. When we use terms such as we, us and our in this notice, we mean Bessway Travel Ltd.

Our responsible person for data protection can be contacted during normal business hours including if you have queries about this privacy notice or wish to exercise any of the rights mentioned in it. The contact details are:

Post: Data Protection,
Bessway Travel Ltd.,
Compound 1,
Magnet Road,
East Lane Business Park,
Wembley,
Middlesex
HA9 7RG

Telephone: 020 8908 0785

This privacy notice may be updated from time to time. This means we may send you an updated copy (depending on whether we are required to do that or not). An up to date version will be made available via our website, www.besswaytravel.co.uk

2. What Kinds of Personal Information About You Do We Process?

- Your title, full name, your contact details, including for instance your email address, home and mobile telephone numbers;
- Your home address, correspondence address (where different from your home address) and address history;

3. What is the Source of Your Personal Information?

We will generally collect your personal information from you directly. Where, exceptionally, a coach booking has been assigned to us by another company, that company may provide us with your personal information.

4. What Are the Legal Grounds for our Processing of your Personal Information (Including When We Share it with Others)?

Data protection laws require us to explain what legal grounds justify our processing of your personal information (this includes sharing it with other organisations). For some processing more than one legal ground may be relevant (except where we rely on a consent).

Here are the legal grounds that are relevant to us:

1. Processing necessary to perform our contract with you for the coach booking or for taking steps prior to entering into it during any pre-contract (i.e. quotation) stage:
 - a) Administering and managing your coach booking and any other services relating to that, updating your records, tracing your whereabouts to contact you about your booking;
 - b) Sharing your personal information with other service providers such as when, exceptionally, we sub-contract your booking to another company and/or when additional services are necessary to complement the booking including ferry operators and hospitality providers;
 - c) All stages and activities relevant to managing your coach booking including enquiry, commitment (i.e. firm booking), administration, scheduling, invoicing and management of accounts
2. Where we consider that, on balance, it is appropriate for us to do so, processing necessary for the following legitimate interests which apply to us and in some cases other organisations (who we list below) are:
 - a) Administering and managing your coach booking and any associated services relating to that, updating your records, tracing your whereabouts to contact you about your coach booking;
 - b) To test the performance of our internal processes;
 - c) To adhere to guidance and best practice under the regimes of governmental and regulatory bodies such as the Information Commissioners Office;
 - d) For management and audit of our business operations including accounting;
 - e) When we share your personal information with these other people or organisations:
 - Our legal and other professional advisers and auditors;
 - Financial institutions;
 - Governmental and regulatory bodies such as the Information Commissioners Office;

- Other organisations and businesses who provide services to us such as IT software and maintenance providers and suppliers of other back office functions;
- Buyers and their professional representatives as part of any future restructuring or sale of our business or assets;

3. Processing necessary to comply with our legal obligations:

- a) For compliance with laws that apply to us;
- b) For establishment, defence and enforcement of our legal rights;
- c) For activities relating to the prevention, detection and investigation of crime;
- d) To deal with requests from you to exercise your rights under data protection laws;
- e) When we share your personal information with these other people or organisations:
 - Law enforcement agencies and government and regulatory bodies such as the Information Commissioners Office; and
 - Courts and other organisations where it is necessary for the administration of justice, to protect vital interests and to protect the security or integrity of our business operations.

4. Processing with your consent:

- a) When you request that we share your personal information with someone else and consent to that;

5. Processing for a substantial public interest under laws that apply to us where this helps us to meet our broader social obligations such as:

- a) Processing that we need to do to fulfil our legal obligations and regulatory requirements
- b) Under laws that are designed to protect your personal data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your personal data.
- c) By reading and agreeing to this Privacy Policy, you are consenting to us processing your personal data as detailed within this Privacy Policy.
- d) We may also need to process your personal data to comply with any legal obligations which may be applicable. Likewise, we may process your personal data where this is in the public interest or if is to protect your vital interests, but this will only be in rare circumstances.
- e) In most cases, our processing of your personal data is necessary for the performance of our services to you.
- f) Certain uses of your personal data, or other processing activities, may not be strictly necessary to perform our services to you, however, they may be necessary for the purposes of our legitimate interests or the legitimate interests of a third party. They may also be in your interests. When we say "legitimate interests", we mean our (or a third party's) interests in enabling us to provide our services to you as efficiently and securely as possible.

5. How Your Personal Data Will be Used

We will use your personal data for the following purposes:

- to help identify you and any accounts you hold with us;
- administration;
- any future research, statistical analysis and behavioural analysis;
- any future customer profiling and analysing your purchasing preferences;
- billing and order fulfilment for bookings made;
- credit scoring and credit checking—see 'Credit checking', below;
- improving our services.

6. How and When Can You Withdraw Your Consent?

Some of what we do with your personal information is not based on your consent, instead it is based on other legal grounds. For processing that is based on your consent, you have the right to take back that consent for future processing at any time.

If you have provided your consent to us for processing in relation to your coach booking, you can withdraw this at any time by contacting our office:

Post: Bessway Travel Ltd.,
Compound 1, Magnet Road,
East Lane Business Park,
Wembley, Middlesex HA9 7RG

Telephone: 020 8908 0785

The consequence of withdrawing consent will be that we:

1. Will not be able to proceed with a forthcoming coach booking and/or that we:
2. Will not be able to respond efficiently to any future business that you may either enquire about or offer us

7. Is Your Personal Information Transferred Outside the UK or the EEA?

We are based in the UK and your personal information will usually be kept within the UK. The only occasion when your personal information may be transferred within the European Economic Area (EEA) may be when a third-party service provider such as a ferry operator requires our client details. If it is processed within Europe or other parts of the EEA then it is protected by European data protection standards.

We do not transfer personal information outside of the EEA in any circumstances.

8. How Do We Share Your Information with Credit Reference Agencies?

In the normal course of our business, we do not perform identity checks on you. If we did need to do this for exceptional business reasons, we would obtain your permission beforehand. We may then supply your information to credit reference agencies (CRAs). CRAs will supply to us both public (including the electoral register) and shared credit and financial history information.

We will use this information to verify the accuracy of the data you have provided to us.

We may continue to exchange information about you with CRAs and routinely perform identity checks while you have a relationship with us.

When CRAs receive an identity search from us they will place a search footprint on your credit file that may be seen by other financial institutions.

9. What Should You Do If Your Personal Information Changes?

You should tell us without delay so that we can update our records.

The contact details for this purpose in relation to a coach booking are:

Post: Data Protection,
Bessway Travel Ltd.,
Compound 1,
Magnet Road,
East Lane Business Park,
Wembley,
Middlesex
HA9 7RG

10. Do You Have to Provide Your Personal Information to Us?

We are unable to provide you with a coach service or to process your coach request order without having personal information about you. Your personal information is required before you can enter into a coach hire contract with us, during the life of that contract, and by laws that apply to us. If we already hold some of the personal information we need – for instance if you are already a client – we may not need to collect it again when you make an enquiry or a firm booking.

In cases where providing some personal information is optional, we will make this clear. For instance, we will say if alternative contact details (such as work) can be left blank.

11. Do We Do Any Monitoring Involving Processing of Your Personal Information?

For the avoidance of doubt, notes of telephone calls and/or in-person meetings between us and you in connection with your coach booking may be taken to make sure we have a record of what was discussed and what your instructions are.

12. For How Long is Your Personal Information Retained by Us?

Unless we explain otherwise to you, we will hold your personal information for the following periods:

- **Retention in case of queries.** We will retain the personal information that we need to keep in case of queries from you (for instance, if you make an unsuccessful coach booking enquiry) for 6 months unless we have to keep it for a longer period (see directly below); and
- **Retention in accordance with legal and regulatory requirements.** We will retain the personal information that we need to keep even after the relevant contract you have with us has come to an end for 6 years. This is to enable you to receive an efficient response from us in the case of a subsequent enquiry or repeat booking.

We will store your data for as long as necessary for the purpose of processing. The data may be deleted in the following circumstances:

- You have withdrawn your consent to data processing
- The original purpose for processing the data is no longer relevant or cannot be performed any more.
- The data is no longer up to date or accurate.

If you would like further information about our data retention practices, please contact us.

13. What Are Your Rights Under Data Protection Laws?

Here is a list of the rights that all individuals have under data protection laws. They do not apply in all circumstances. If you wish to exercise any of them we explain at that time if they are engaged or not.

- You have the **right to be informed** – we have to be transparent with you about the processing that we need to do with your personal information. This is why we have a privacy notice. Your right to be informed may be relevant if you consider it necessary to ask for more information about what we do with your personal information.
- You have the **right to request access** to your personal records or other information that we hold about you, to obtain confirmation that it is being processed, and to obtain certain prescribed information about how we process it. This may assist if you wish to find out what personal information we do have about you in order to then determine if you can exercise the other rights mentioned in this section. There is no administrative charge for this service.
- You have the **right to rectify any errors** in the data we hold about you. If any data or information we hold about you is inaccurate, incomplete or out of date, please contact us and we will correct this immediately. If we have disclosed the personal information in question to other organisations, we must inform them of the rectification where possible. Your rights in relation to rectification may be relevant if you consider that we are processing inaccurate or incomplete information about you.
- You have the **right to have the data we hold about you erased**. This is also known as the 'right to be forgotten'. This enables an individual to request the deletion or removal of personal information where there is no compelling reason for its continued processing. This right is not absolute – it applies only in particular circumstances and where it does not apply any request for erasure will be rejected. It may be relevant where the personal information is no longer necessary in relation to the purpose for which it was originally collected/processed. If the processing is based on consent which you then withdraw; when you object to the processing and there is no overriding legitimate interest for continuing it; if the personal information is unlawfully processed; or if the personal information has to be erased to comply with a legal obligation. Requests for erasure may be refused in some circumstances such as where the personal information has to be retained to comply with a legal obligation or to exercise or defend legal claims.
- You have the right to **restrict processing** of your personal information. If you wish us to continue to store your information but wish us to keep your data separate and not process it in any way, please let us know. These circumstances could apply for example, when you contest it as being inaccurate (until the accuracy is verified); where you have objected to the processing (where it was necessary for legitimate interests) and we are considering whether our legitimate interests override your own; where you consider that the processing is unlawful (and where this is the case) and where you oppose erasure and request restriction instead; or we no longer need the personal information for the purposes of the processing for which we were holding it but where you require us to continue to hold it for the establishment, exercise or defence of any legal claims.
- We do not engage in direct marketing at the present time. However, if we were to do this in the future **you have the right to ask us to stop processing** your personal data for direct marketing purposes. You may also specify that you object to direct marketing by particular channels such as by email or telephone. If this is the case, you will need to specify the channels you are objecting to in your communications with us. **You also have the right to object to any direct marketing.**
- You have the **right to data portability**. If you wish to obtain your data for your own purposes across different services, we will provide this information to you in a CSV file. There is no administrative charge for this service.

To assert any of your rights set out above, you should send your request in writing to us using our email: info@besswaytravel.co.uk.

You will need to provide proof of identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill); and specify the personal data you want access to, to be amended or be removed.

You have the right to complain to the Information Commissioner's Office which enforces data protection laws: <https://ico.org.uk/>

If you wish to exercise any of these rights against the Credit Reference Agencies who are data controllers in their own right, you should contact them separately.

14. Data Anonymisation and Use of Aggregated Information

Your personal information may be converted into statistical or aggregated data which cannot be used to re-identify you. It may then be used to produce statistical research and reports for internal company use. This aggregated data may or may not be shared and used in all the ways described in this privacy notice.

15. Your Marketing Preferences and What This Means

We do not currently undertake proactive marketing. If we were to do this at some time in the future, we may use your home address, phone numbers and email address to contact you according to your marketing preferences. This means we do this only if we have your consent under data protection laws.

You can stop our marketing at any time by writing to us at:

Post: Data Protection,
Bessway Travel Ltd.,
Compound 1,
Magnet Road,
East Lane Business Park,
Wembley,
Middlesex
HA9 7RG

16. Data Privacy Notices from Other Organisations

We have mentioned that we may share your personal information with Credit References Agencies. If we use these agencies, they will require us to pass on to you information about how they will use your personal information to perform their services or functions as data controllers in their own right. Their notice will be entirely separate to our own privacy notice and will be made available when we need to use their services.

17. Children

We only offer our services to individuals over the age of 18.

If we obtain personal information relating to children such as their names and addresses, this will only be kept for the purpose of the specific coach hire period. Following this completion of the coach hire contract, personal information relating to children as part of that contract will be deleted/destroyed.

18. Monitoring

We may monitor and record communications with you (such as emails) for the purpose of Quality Assurance, Training and Compliance.

19. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. You should check this Notice periodically to ensure you are aware of the most recent version that will apply when you wish to enter into a coach hire contract with us.

20. Who Is in Our Group

As at the date of this privacy notice, Bessway Travel is an independent Limited Company in its own right. We are not part of a larger organisation and do not have subsidiary business units. Bessway Travel trades in its own name and has no other brand names.