

Data Protection Policy

This document sets out the Data Protection Policy of **ALTITUDE LUXURY TRAVEL** (the "Altitude Luxury Travel"), a corporation organised and existing under the laws of The United Kingdom with its head office located at 10 Laird Avenue, Sheffield S6 4BU.

1. Terms & Definitions

The terms and definitions used in this policy are as follows:

"Data Controller" The person who (either alone or with others) decides what personal information Altitude Luxury Travel will hold and how it will be held or used.

"Data Protection Act 1998 & General Data Protection Legislation" The UK legislation that provides a framework for responsible behaviour by those using personal information.

"Data Protection Officer" The person(s) who are responsible for ensuring that Altitude Luxury Travel follows its data protection policy and complies with the Data Protection Act 1998.

"Consumer" The person whose personal information is being held or processed by Altitude Luxury Travel. Examples are staff prospects, business contacts, suppliers and customers.

"Explicit consent" is a freely given, specific and informed agreement by a consumer in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data.

"Information Commissioners Office (ICO)" The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

"Processing" means collecting, amending, handling, storing or disclosing personal information.

"Personal Information" Information about living individuals that enables them to be identified – e.g. name, address and contact details such as landline phone, mobile phone and email.

"Sensitive data" refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings

2. Introduction

Altitude Luxury Travel needs to collect and use certain types of information about the customers and potential customers (consumers) who come into contact with the company. We need to collect this information to carry on our work.

We understand and accept that this personal information must be carefully collected and dealt with appropriately. This care and professionalism needs to be practiced whether consumer information is collected on paper, stored in a computer database, or recorded on in any other media or via any other material. Altitude Luxury Travel acknowledges that this needs to happen to be compliant with the legislation set out in the Data Protection Act 1998 and the up and coming GDPR.

3. Data Controller

Robert Burley is the nominated Data Controller under the Act. This means that Robert Burley determines what purposes personal information held and what it will be used for. Robert Burley is also responsible for notifying the Information Commissioner of the data it holds or is likely to hold, and the general purposes that this data will be used for.

4. Disclosure

Altitude Luxury Travel may need to share data with other agencies such as the police, local authorities and contracted suppliers.

The consumers will be made aware of how their information will be used and with whom their information will be shared. There are circumstances where the law allows Altitude Luxury Travel to disclose data (including sensitive data) without the data subject's consent.

These are in the following scenarios:

- a) Supporting a criminal investigation, a legal duty or as authorised by the Secretary of State
- b) Protecting vital interests of a consumer or other person
- c) The consumer has already made the information public
- d) Conducting any legal proceedings, obtaining legal advice or defending any legal rights
- e) Monitoring for equal opportunities purposes – i.e. race, disability or religion
- f) Providing a confidential service where the consumers consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we

would wish to avoid forcing stressed or ill consumers to provide consent signatures.

Altitude Luxury Travel regards the lawful and correct treatment of personal information as very important to a successful business operation and to maintaining the confidence of those consumers and contacts that we deal with.

Altitude Luxury Travel intends to ensure that personal information is treated lawfully and correctly.

To this end, Altitude Luxury Travel will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998 and in GDPR.

Specifically, the Data Protection Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,
- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, when necessary, kept up to date,
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act,
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- h) Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of consumers in relation to the processing of personal information.

Altitude Luxury Travel will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used

- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. These include:
 - The right to be informed that processing is being undertaken,
 - The right of access to one's personal information with a 72-hour notice period
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as incorrect information
- Take appropriate technical and organisational security measures to safeguard personal information
- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

5. Data collection

Informed consent is when

- A consumer clearly understands why his or her information is needed, with whom it will be shared with, the possible consequences of the consumer agreeing or refusing the proposed use of the data
- And then gives his or her consent.

Altitude Luxury Travel will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, online or by completing a form.

When collecting data, Altitude Luxury Travel will ensure that the Consumer:

- a) Clearly understands why the information is needed

- b) Understands what it will be used for and what the consequences are should the Consumer decide not to give consent to processing
- c) As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed
- d) Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress
- e) Has received sufficient information on why their data is needed and how it will be used

6. Data Storage

Information and records relating to service users will be stored securely and will only be accessible to authorised staff or contractors.

Information will be stored for only as long as it is needed or required by statute and will be disposed of appropriately.

It is Altitude Luxury Travel's responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

7. Data access and accuracy

All consumers have the right to access the information that Altitude Luxury Travel holds about them. Altitude Luxury Travel will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, Altitude Luxury Travel will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do

- They will deal promptly and courteously with any enquiries about handling personal information
- They will always describe clearly how personal information will be handled
- They will regularly review and audit the ways they hold, manages and use personal information
- They will regularly assess and evaluate methods and performance in relation to handling personal information
- All staff are aware that a breach of the rules and procedures identified in this policy may lead to legal action and fines being applied against the company.

This policy will be updated as and when it is deemed necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the Data Protection Act 1998 and GDPR May 2018.

In case of any queries or questions in relation to this policy please contact the Data Protection Officer Robert Burley via email at robert.burley@altitudeluxurytravel.com

Signed:

A handwritten signature in black ink, appearing to read 'R Burley', is written in a cursive style within a rectangular box.

Position: Owner Altitude Luxury Travel

Date: 05/01/2020