



PRIVACY POLICY

We are committed to doing the right thing when it comes to how we collect, use and protect your personal data. Your privacy matters to us. Our privacy policy explains:

- What types of personal data we collect and why we collect it
- When and how we may share personal data
- How you can access and update your personal data

Personal data we collect

When you register for any of our services, you may provide us with:

Your personal details, including your address, email address, phone number and date of birth

When you buy our products, we may collect:

- Passenger information, passport details, other ID document details
- Personal details, including your address, email address, phone number, date of birth along with name and phone number of a contact in case of an emergency
- Insurance details
- Relevant medical data and any special, dietary, religious or disability requests
- Information about your purchases, including what you bought, how you paid for it and credit or other payment information

When you contact us or we contact you or you take part in promotions, competitions, surveys or questionnaires about our services, we may collect:

- Personal data you provide when you connect with us including by email and phone or through social media, such as your name, username and contact details
- Your feedback and contributions to customer surveys and questionnaires.

Other sources of personal data:

- Your insurance company, their agents and medical staff may exchange relevant personal data and special categories of personal data with us in circumstances where we/they need to act on your behalf or in the interest of other customers or in an emergency.
- If you connect with us via our social platforms e.g. Facebook, Twitter and Instagram, you will agree to share your user details with us. For example, your name, email address, date of birth, location and any other information you choose to share with us.

Personal data you provide about other individuals:

- We use personal data about other individuals provided by you, such as those people on your booking
- By providing other people's personal data, you must be sure that they agree to this and you are allowed to provide it. You should also ensure that, where appropriate, they understand how their personal data may be used by us

Using your personal data

We use your personal data in a variety of ways:

To provide the products and services you request

We need to process your personal data so that we can manage your booking, provide you with the products and services you want to buy and help you with any orders and refunds you may ask for.

To manage our products, services and day-to-day operations

We may use personal data to respond to and to manage security operations, accidents or other similar incidents, including medical and insurance purposes.

We use personal data to carry out market research and internal research and development, and to develop and improve our product range, services, IT systems, security, know-how and the way we communicate with you.

To personalise your experience

We want to ensure that marketing communications relating to our products and services, including online advertising, are relevant to your interests.

To do this, we may use your personal data to better understand your interests so that we can try to predict what other products, services and information you might be most interested in. This enables us to tailor our communications to make them more relevant and interesting for you.

Looking at your browsing behaviour and purchases helps us to better understand you as a customer and it allows us to provide you with personalised offers and services.

We may also measure your responses to marketing communications relating to products and services we offer, which enables us to offer you products and services that better meet your needs as a customer.

If you do not want to receive a personalised service from us, you can change your preference online, over the phone or by writing (e.g. email) to us at any time. We will update our records as soon as we can.

To make contact and interact with you

We want to serve you better as a customer so if you contact us, for example by email, post, and phone or via social media, we may use personal data to provide clarification or assistance to you.

We need to process your personal data so that we can manage any promotions and competitions you choose to enter, including those we run with our suppliers and retail partners. For example, if you win a prize.

We may invite you to take part in customer surveys, questionnaires and other market research activities.

To help us to better understand you as a customer, and to be able to provide you with services and marketing communications (including online advertising relevant to your interests), we may combine the personal data we collect when you make purchases in-shop with personal data collected from our websites, mobile apps and other sources.

We do not sell or give your personal data to third parties.

Marketing communications

From time to time we may send you relevant offers and news about our products and services in a number of ways, including by email.

When you book or register with us we will ask if you would like to receive marketing communications by giving you the option to OPT IN. You can OPT OUT or change your preferences online, over the phone or through our marketing emails at any time.

You may still receive service-related communications from us. For example, confirming bookings you make with us and providing important information about the use of our products or services.

Market research

We like to hear your views to help us to improve our products and services, so we may contact you for market research purposes. You always have the choice about whether to take part or continue in our market research.

Sharing personal data with suppliers

In order to provide products or services requested by you we may share personal data with suppliers of your travel arrangements, including airlines, hotels and transport companies.

We may need to share personal data to establish, exercise or defend our legal rights; this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk.

When we share personal data with other organisations we require them to keep it safe, and they must not use your personal data for their own marketing purposes.

We only share the minimum personal data that enable our suppliers and retail partners to provide their services to you and us.

Sharing personal data with regulatory authorities

So that you can travel, it may be mandatory (as required by government authorities at the point of departure and/or destination) to disclose and process your personal data for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate.

Some countries will only permit travel if you provide your advance passenger data (for example Caricom API Data and US Secure Flight Data). These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may assist where appropriate.

We may share the minimum personal data necessary with other public authorities if the law says we must, or we are legally allowed to do so.

Protecting your personal data

We know how important it is to protect and manage your personal data. We take appropriate security measures to help protect your personal data from accidental loss and from unauthorised access, use, alteration and disclosure.

The security of your data also depends on you. For example, where we have given you or where you have chosen a password for access to certain services, you are responsible for keeping this password confidential.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by organisations operating outside the EEA who work for us or for one of our suppliers. We put in place appropriate protections to make sure your personal data remains adequately protected and that it is treated in line with this notice.

Data retention

We will 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 and regulatory requirements. After this period, we will securely erase personal data.

Social media

Our websites or mobile apps may contain social media features such as Facebook, Twitter and Instagram which have their own privacy notices. Please make sure you read their terms and conditions and privacy notice carefully before providing any personal data as we do not accept any responsibility or liability for these features.

Accessing and updating your personal data; and complaints

You have a right to ask for a copy of the personal data we hold about you. You can write to us asking for a copy of other personal data we hold about you.

Where we can provide data access, we will do so free of charge except where further copies are requested in which case we may charge a reasonable fee based on administrative costs.

We want to make sure that the personal data we hold about you is accurate and up to date. If any of the details we hold are incorrect, please let us know.

You can also ask for your personal data to be amended or erased, to object to the processing of your personal data and, where technically feasible, to ask for personal data you provided to be transmitted to another organisation.

We will update or erase your data, unless we have to keep it for legitimate business or legal purposes.

You can also contact us if you have a complaint about how we collect, store or use your personal data. We aim to resolve complaints but if you are dissatisfied with our response, you may complain to the Information Commissioner's Office.

Please note that we may ask you to verify your identity before we can act on your request or complaint. We may also ask you for more information to help ensure that you are authorised to make such a request or complaint when you contact us on behalf of someone else.

Legal basis for processing personal data

We will only collect and use your personal data if at least one of the following conditions applies:

- We have your consent

Example: Customer account

You give us permission to process your personal data when you register for a customer account.

- It is necessary for a contract with you or to take steps at your request prior to entering into a contract;

Example: To provide the products and services you request

We need to process your personal data so that we can manage your account or booking, provide you with the products and services you want to buy and help you with any orders and refunds you may ask for.

- It is necessary for us to comply with a legal obligation;

Example: Sharing personal data with regulatory authorities

So that you can travel, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your personal data for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate.

- It is necessary to protect your vital interests or those of another individual;

Example: In an emergency

Your insurance company, their agents and medical staff may exchange relevant personal data and special categories of personal data with us in circumstances where we/they need to act on your behalf or in the interest of other customers or in an emergency.

- It is in the public interest or we have official authority; or

Example: Security operations

We may use personal data to respond to and to manage security operations, accidents or other similar incidents, including medical and insurance purposes.

- It is in our or a third party's legitimate interests and these are not overridden by your interests or rights.

Example: To personalise your experience

We may use your personal data to better understand your interests so that we can try to predict what other products, services and information you might be most interested in. This enables us to tailor our communications to make them more relevant and interesting for you.

Where we need to process special categories of personal data, for example health data for medical reasons, we will only do so if one or more additional conditions apply. For example, we have your explicit consent; it is necessary to protect the vital interests of you or another individual and you are physically or legally incapable of giving consent; it is necessary to establish, exercise or defend legal claims; it is necessary for reasons of substantial public interest.

Changes to our Notice

This policy replaces all previous versions. We may change the policy at any time so please check it regularly on our website for any updates.

Updated: May 2018