



## Privacy Statement Flightlink Executive Travel

This privacy statement explains how Flightlink Executive Travel Ltd use any personal information we collect about you when you contact us or use our website. In this document, "we" or "us" refers to Flightlink Executive Travel Ltd.

We are company number 9025633 registered in England & Wales

Our registered office is at Unit 23, Enterprise House, Cheney Manor Industrial Estate, Swindon, SN2 2YZ

### Confidentiality

We are extremely serious about protecting your privacy and confidentiality. We respect your wishes to not share certain items of confidential information about you and your employees. We will take all reasonable means to keep this information confidential whether this is held on computer, on paper or on other media.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

Every member of staff working for Flightlink has a legal duty to keep information about you and your employees secure and confidential. This is also included in staff contracts of employment.

If you think we are failing to abide by our privacy statement, **do please tell us.**

### Information we hold about you

At Flightlink, we aim to provide you with the highest quality of Client Services. To do this we must keep records about you, your company, your employees and the services we have provided to you or plan to provide to you. The information we hold about you is protected by strict physical, electronic and other means. Our staff may ask you or your employees to provide certain personal information.

Helping you to plan and book your ground transportation we have to collect, keep and share some personal data and ask that you agree to that in line with our general data protection policy. We may collect the following information about you when you register with us or make a booking to use our services. The types of information we collect or process may include:

- Name
- Contact information including email address and physical address
- Office address
- Telephone number
- Other information to enable us to process your booking

## Why and how do we use your personal data

We comply with the General Data Protection Regulations to process your personal data. This is in order to provide you with appropriate services or to meet contractual or legal obligations.

We need to collect your personal data to direct, manage and deliver our services or facilitate the performance of a contract you've entered, or are entering into such as making a booking with us. These may include:

- facilitate the completion of the online booking form, including your contact details to enable the booking to be processed.
- contacting with messages in order to deliver our services such as booking confirmation emails or other essential communications like alerts and notifications about changes or updates of arrival time of the vehicle.
- Responding to communications you have sent us regarding your special requests or customer feedback and so that concerns you may have about the services can be properly investigated.
- Where you have created an account with us, maintaining and administering this and ensuring that it is kept up-to-date and accessible.
- Internal record keeping.
- We may use the information to improve our products and services.
- Sometimes we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail.
- From time to time we will also contact you to make you aware of services that we feel will be of interest to you and your company
- If we intend to use your information for any other purpose then you will be asked first. We will always explain what information we want to share, why we want to share it and who we want to share it with. This will then help you decide if you are happy for us to do so.

Where we process your personal data based on a legitimate interest we will only do so where the processing is relevant, adequate and limited to what is necessary for the purpose it was collected for.

## Who we may share your information with

Flightlink collects, stores and uses only small amounts of personal information. The information we do collect is used by different people as part of their normal work.

Information will be seen by staff looking after you and your employees and who are involved in delivering our services. Under the Confidentiality Code of Conduct, all Flightlink Executive Travel Ltd staff are required to protect customer information, to keep customers informed of how their information will be used, and to allow customers to decide about how their information can be shared.

We will not share information with friends or relatives unless they are legally acting on your behalf or unless you are happy for us to do so.

We may have to retain and use your information in connection with legal claim or for compliance, regulatory and auditing purposes. For example we may retain information where we are required by law, or if we are compelled to do so by a court order or regulatory body.

We will not sell, distribute or lease your personal information to third parties.

We do not send or process your data outside the European Economic Area.

We will obtain your consent for purposes such as:

- phone calls or sending you emails for services you request such as quotes and journey details
- sending you direct marketing communication via email or post
- recording and evaluating feedback you give us where you take part in on-to-one user testing

Where we process your personal data based only on your consent, you can withdraw this consent at any time by contacting the Data Protection Officer at Flightlink via our website or by mail.

### ***Other websites***

Our website may contain links to other websites. This privacy statement only applies to this website, so when you link to other websites you should read their own privacy notices. We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **How do we keep your personal data secure**

Safeguarding your privacy is embedded in our culture and we use a combination of industry standard methods to protect it. We limit access to only those Flightlink group employees who have to come into contact with your information to do their jobs and deliver our services.

Unfortunately, no website or app can guarantee complete security but we have created and business wide security programme designed to keep your personal data as safe as possible. We use a range of technical, organisational and administrative security measures and best practice techniques, depending on the type of data being processed. For example:

- We will store all personal information you provide on secure (password and firewall protected) servers. The booking system we use to store your data have access limitations and in cloud based servers that use industry standard encryption.
- All electronic financial transactions entered are protected by encryption technology. The features in the design of the software we use, card details are encrypted in the database and any fields viewable by the data processor will be 'starred out'. We do not store any payment card details.
- You are responsible for keeping the password you use for accessing our online booking platform on our website confidential, we will not ask for your password (except when you log in to our website)
- To make sure we maintain a culture of data privacy, we provide data protection and privacy training to all Flightlink employees.
- It is our goal to use the minimum amount of personal data possible during our workflow processes through data minimisation techniques for instance to anonymise some of the fields in documents and systems we may use.

- Whenever we develop or update our services in ways that involve the collection or use of new forms of personal data, we conduct a privacy impact assessment to understand and reduce the likelihood of any unintended impact on you.

### **What are your choices and your rights**

- You have rights in relation to the personal data we have about you and your employees.
- You and your employees have the right to ask for a copy of your personal data; to correct, delete or restrict processing of your personal data.
- You have the right to be informed about how your personal data is used at Vivio.
- You and your employees have the right to have any inaccurate information corrected.
- You and your employees have the right to access the personal information we hold about you.
- You have the right to object if your personal data is being used – particularly for Marketing purposes
- You have the right to protect yourself against automated decision making and profiling
- Where we have asked for your consent, you may withdraw consent at any time.
- If you have unresolved concerns you have the right to complain to the data protection authority

Should you be unable to satisfactorily exercise any of these rights, you can contact our Data Protection Officer by mail at Flightlink Executive Travel Ltd, Unit 23, Enterprise House, Cheney Manor Industrial Estate, Swindon, SN2 2YZ.

### **Keeping your information accurate and up-to-date**

We will make sure that the information we hold about you and your employees is accurate and up-to-date. We may check with you from time to time to make sure we have the right information. If the information is not correct you may ask us to change it.

### **Can I see my own records?**

You and your employees can see or receive a copy of your records and have any information you do not understand explained to you.

If you have any questions about the personal data we hold please request a Subject Access Request (SAR) form in writing from the Data Protection Officer who will coordinate a response.

We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee.

### **How to deal with data breaches**

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and

freedoms of individuals then we must also notify the Information Commissioner's Office within 72 hours.

If you are aware of a data breach you must contact the Data Protection Officer immediately and keep any evidence you have in relation to the breach.

### **Retention of data**

We keep information about you in paper records and also in electronic records. We need to keep this information in order to provide you with the best possible service. Certain types of information about you need to be kept for longer than other information. We will not keep information about you longer than is necessary or longer than required by law.

### **Amendments to our privacy policy**

We keep our privacy statement under regular review and we will place any updates on this web page. You should check this page occasionally to ensure you are happy with any changes to this privacy statement

### **How to contact us**

Please contact us if you have any questions about our privacy statement or information we hold about you.

- By [email](#)
- or write to us at : Data Protection Officer; Flightlink Executive Travel Limited, Unit 23, Enterprise House, Cheney Manor Industrial Estate, Swindon, SN2 2YZ.