

Data Protection Privacy Policy

What is the purpose of this privacy policy?

This privacy policy is to tell you what personal data we collect from you and why and what we will do with this data. It also tells you about the key rights which you have under data protection laws. You and your personal data are protected by the UK General Data Protection Regulation (UK GDPR). UK GDPR is EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data incorporated into English law. In this privacy policy, we refer to UK GDPR, the UK Data Protection Act 2018 and any UK regulations made in connection with the Data Protection Act as Data Protection Laws.

We will only process your personal data as set out in this privacy policy or otherwise notified to or agreed by you or as we are otherwise permitted to do in accordance with Data Protection Laws.

When we refer to you in this privacy policy, we mean the party leader, anyone else we communicate with in respect of an enquiry, quote or booking (for example, the person by or through whom payment is made if not the party leader), the students and accompanying staff who travel or are intended to travel on one of our trips and the parents / guardians of the students and for adult groups, the persons who travel or are intended to travel on one of our trips.

What is our role in relation to your personal data?

For the purposes of Data Protection Laws, we, Rayburn Tours Limited, are a data controller in respect of the personal data you provide us with.

What is my personal data and what do you mean by process?

When we refer to personal data, we mean any information which relates to an identified or identifiable individual.

References to process or processing in this privacy policy have the meanings provided by Data Protection Laws which includes collecting, storing, using, disclosing to third parties and erasing the data.

Do we use artificial intelligence and if so, what for?

We may use artificial intelligence (also referred to as AI) to process personal data for any of the purposes referred to in this privacy policy. The uses we make of AI are evolving and will continue to change. Over time, we expect to use AI in more and different ways. The use of AI means we are able to operate more efficiently and effectively but is unlikely to change how we use personal data and for what purposes which we expect will continue to be as set out in this policy.

Current uses of AI by Rayburn include the following:

1. Transcription of client calls from booking to pre and post tour departure which will be stored in our CRM (Customer Relationship Management) system: this material may be used to create action points for internal and external use
2. Automated booking and scheduling of tours and services
3. Streamlining group bookings, managing availability in real-time and automating reminders and confirmations
4. AI-powered customer support
5. Use of chatbots to handle FAQs, provide multilingual support and assist customers before and after tours
6. Predictive analytics
7. Forecasting demand, group sizes and pricing strategies using historical data and trends
8. Creation of customer correspondence
9. Automation of document production including automatic generation of itineraries, consent forms, insurance summaries and educational materials
10. Creation of content and marketing material
11. Writing blog posts, social media content and SEO-optimised web pages and
12. Translation and accessibility of materials (including in real-time)

What is the legal basis for our collecting and using your personal data?

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- Performance of a contract with you: Where we need to perform the contract we are about to enter into or have entered into with you.
- Legitimate interests: We may use your personal data where doing so is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Legal obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

What personal data will we collect from you and why?

In order to respond to an enquiry, provide a quote, administer and fulfil your booking or send you a brochure, other information or promotional material, we need to collect and process your personal data.

Where you wish to make a booking, the personal data we need to collect and process at various stages is likely to include;

- name and job title of the party leader
- contact details for the party leader including their home and work e-mail and postal addresses and telephone number(s)
- if different to the party leader, the point of contact for financial arrangements / payments including their email and postal addresses and telephone number(s)
- names and dates of birth of all persons travelling
- passport information for all persons travelling
- dietary information for all persons travelling – this may come within special categories of personal data (see below)
- emergency UK contact details (names and telephone numbers) for all persons travelling
- for homestay trips, cultural, medical, physical and dietary requirements of the students
- for skiing trips, height, shoe size and weight of all persons skiing
- for concert tours, photographs of persons travelling and musical biographies of key performers
- information in respect of any medical condition, disability or restricted mobility which may affect anyone travelling – this comes within special categories of personal data (see below)

For an enquiry, the personal data we will need to process is likely to include the name and contact details of the person making the enquiry.

For a booking or booking enquiry, we will process your personal data (other than any data which comes within special categories of personal data - see below) on the basis that this is necessary for the performance of your contract with us or to enable us to take steps at your request prior to your entering into a contract with us. We may also need to do so to comply with a legal obligation to which we are subject or in order to protect your vital interests (for example, in an emergency situation).

If you wish to receive brochures or other promotional material from us, we will need your name and the contact details applicable to the form of communication you have consented to. For example, if you wish to receive information by e-mail, we will need your e-mail address.

We do not use any personal data for marketing purposes other than the names and applicable contact details of the person who has consented to receive such material.

What are special categories of personal data?

Personal data which concerns your health or which reveals or may reveal your racial or ethnic origin or religious beliefs or your sexual orientation is treated as special categories of personal data. Other information also comes within special categories but this is unlikely to be relevant to the booking and provision of travel arrangements.

Generally speaking, the processing of special categories of personal data requires the explicit consent of the person concerned.

Accordingly, information concerning any disability, medical condition, restricted mobility or other health related issue (and related requirements) as well as dietary restrictions which disclose or may disclose your religious beliefs or any health issue are special categories of personal data. We will ask for your consent to our processing this information at the time you make your booking or your booking enquiry or whenever you otherwise provide or indicate that you intend to provide such information. This consent should be provided to us by the party leader on behalf of the person concerned who must authorise the party leader to do so.

In the case of special categories of personal data which relates to children and young people under the age of 18 when the consent is required, consent will need to be provided by the party leader on behalf of the individual's parent or legal guardian who must authorise the party leader to do so.

Who may we provide your personal data to?

Where you make a booking, appropriate personal data will be passed on to the relevant suppliers of your chosen arrangements together with any other third party who needs this information so that we can arrange for your tour to be provided. Suppliers and other third parties are likely to include the following depending on the arrangements booked:-

Depending on your booking, these suppliers and third parties may include:

- Transport providers (e.g., airlines, ferry operators, coach companies)
- Hotels or other accommodation providers
- Overseas ground agents
- Tour managers and guides
- Excursion and activity operators
- Travel insurance providers
- Concert venues and sports fixture organisers
- Ski schools and ski hire shops
- Payment processors (e.g., credit card companies, banks)
- Feedback and review platforms

Certain personal data may also be provided to government / public authorities such as customs or immigration if required by them, or as required by law.

We may also make limited personal data (names and email or postal addresses) available to other companies who provide services on our behalf, such as mailing brochures and marketing material.

We only provide third parties with the personal data they require in order to deliver their services. Other than in relation to government / public authorities (over whom we have no control), we require all third parties to whom we provide your personal data for any reason to keep it secure, treat it in accordance with the law and our instructions and only use it for the purposes of providing their services.

Personal data protection principles

We adhere to the principles relating to processing of personal data set out in the UK GDPR which require personal data to be:

- (a) processed lawfully, fairly and in a transparent manner (lawfulness, fairness and transparency);
- (b) collected only for specified, explicit and legitimate purposes (purpose limitation);

- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed (data minimisation);
- (d) accurate and where necessary kept up to date (accuracy);
- (e) not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed (storage limitation);
- (f) processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful processing and against accidental loss, destruction or damage (security, integrity and confidentiality);
- (g) not transferred to another country without appropriate safeguards in place (transfer limitation); and
- (h) made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data (data subject's rights and requests).

We are responsible for and must be able to demonstrate compliance with the data protection principles listed above.

Lawfulness, fairness and transparency

Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

We may only collect, process and share personal data fairly and lawfully and for specified purposes. UK GDPR restricts our actions regarding personal data to specified lawful purposes. These restrictions are not intended to prevent processing but ensure that we process personal data fairly and without adversely affecting the data subject.

UK GDPR allows processing for specific purposes, some of which are set out below:

- (a) the data subject has given their consent;
- (b) the processing is necessary for the performance of a contract with the data subject;
- (c) the processing is necessary to meet our legal compliance obligations;
- (d) the processing is to protect the data subject's vital interests; or
- (e) the processing is to pursue our legitimate interests (or those of a third party) for purposes where they are not overridden because the processing prejudices the interests or fundamental rights and freedoms of data subjects.

Where will we process your personal data?

Your personal data will be stored, used and otherwise processed within the UK and/or any other country(ies) of the European Economic Area (EEA). EEA countries are all member states of the European Union together with Norway, Iceland and Liechtenstein.

We will transfer personal data to suppliers who provide services on our behalf where and to the extent this is necessary to enable us to perform our contract with you or where you have given us explicit consent in writing to do so. Depending on the location of the supplier, this may involve transferring personal data outside the UK / EEA.

Data protection laws may not be as strong outside the UK and EEA as they are in the UK and EEA. Personal data will not be transferred to a country outside the UK and EEA unless (1) the country to which it is transferred is one which the UK and/or European Commission considers to provide an adequate level of data protection or (2) the personal data is transferred to a supplier which is required by our contract with them only to deal with the data in accordance with our instructions and to maintain appropriate security to protect the personal data which we are satisfied they have or (3) we are obliged to provide the personal data to a government / public authority in order to provide your travel arrangements.

How do we protect your personal data?

We take appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data, which are appropriate to the harm that might result from the unauthorised or unlawful processing or accidental loss, destruction or damage and the nature of the data to be protected, having regard to the state of technological development and the cost of implementing any measures.

Can we use your personal data to send you information about our tours and other travel services in the future?

We will only retain and use your personal data for marketing purposes where you have specifically consented to our doing so or, in relation to e-mail marketing, where we comply with the Privacy and Electronic Communications Regulations 2003 (PECR). PECR permits us to send you e-mail marketing where you have previously provided us with your e-mail address in the course of entering into a contract with us for tour arrangements or negotiations for such arrangements and we wish to e-mail you marketing material about our similar services or products. You will of course be given the opportunity to opt out of receiving such e-mail marketing communications when you first provide us with your e-mail address and whenever we send you any e-mail marketing.

You may provide your consent to receiving marketing material from us either on-line or by telephone. You may also choose in what ways you are happy to receive communications from us. You may, for example, be happy to receive information and offers by post and e-mail but not by telephone.

Can you withdraw your consent to our processing your personal data?

Yes, you can withdraw your consent to receiving marketing material or other communications from us at any time, either generally or in any particular way, by e-mailing us at info@rayburntours.com. Alternatively, you can call us.

How can you find out what information we are holding about you?

You are entitled to ask us (by letter or e-mail) what personal data of yours is being held or processed, for what purpose and to whom it may be or has been disclosed. No fee will be charged for responding to this request unless it is obviously unfounded or excessive or we have previously provided the same information. We promise to respond to your request without delay and in any event within 1 month unless the request is complex or you have made numerous requests in which case we may be able to extend our response time by a further 2 months.

What should you do if the personal data we are holding is inaccurate, out of date or incomplete?

If you believe this is the case, please tell us by e-mail as soon as possible. We will rectify the problem within 1 month or within 3 months if the rectification request is complex.

How long can we retain and process your personal data?

We will not process your personal data in a form which enables you to be personally identified for any longer than is necessary in order to fulfil the purpose for which it was originally collected or for any other legitimate business purpose.

Where your personal data has been provided for the purpose of the travel arrangements or other services you have contracted, we are entitled to retain this data for a period of 6 years after those arrangements have been completed. In certain limited circumstances, we may be able to retain it for a longer period.

If you have consented to receiving marketing communications from us, we may continue to use your personal data for this purpose until you withdraw your consent or otherwise for as long as we reasonably consider your consent remains valid and effective.

Can you ask us to delete your personal data?

Yes, you can ask us to erase your personal data in certain circumstances, for example where you have withdrawn your consent to further marketing material where the data in question has only been processed for this purpose. However, this is not always the case. Please see the previous paragraph for further information on the period of time we may retain personal data.

Can this privacy policy be changed?

Yes, from time to time we may need to make changes to this privacy policy. These may be required as a result of changes in data protection laws or in the guidance issued by regulators such as the Information Commissioner's Office (which is usually referred to as the ICO) or where we make changes to our procedures. The latest version of this privacy policy can be found on our website www.rayburntours.com

Does your website use cookies?

Yes, as is the common practice, our website uses cookies. A 'cookie' is a small data file which our website server stores on your computer in order to collect information about your visit and to remember you when you visit again at a later date. The main purpose of a cookie is to identify users and to personalise their visit by customising web pages for their use. We may also use third parties who will collect data which is not personally identifiable to analyse site visits and carry out other similar activities. In the course of doing so, they may place their own cookies on your computer so that they can collect information about your visit. You may if you wish disable or delete such cookies through your internet browser. However, doing so may mean you will be unable to access our website or parts of it, your experience of our website may be adversely affected and/or you may not receive information which is relevant to your personal interests.

What should I do if I have a complaint about the processing of my personal data?

If you have any complaint about the way in which your personal data has been dealt with, please let us know by e-mail to **dataprotectionofficer@rayburntours.com**. We will investigate and respond to you as soon as we reasonably can. If you remain dissatisfied, you may complain to the Information Commissioner's Office. For further details,