



TRAVEL PLACES

(Travel Places, in association with American Express Global Business Travel)

Travel Places (WS) Ltd, Podium House, 61 Chapel Road, Worthing, West Sussex, BN11 1HR

T: +44 (0)1903 832888 | www.travelplaces.co.uk

TRAVEL PLACES PRIVACY POLICY

Introduction

Travel Places (WS) Ltd (collectively referred to as “Travel Places”, “we”, “us” or “our” in this privacy notice) respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and/or use our services.

Travel Places work in association with American Express Global Business Travel (GBT). As part of this association, your information is further governed by the GBT Global Privacy Statement. For questions about your personal information, you may contact GBT as directed in its Privacy Statement, which is available [here](#) or contact us here at privacy@travelplaces.co.uk.

Please refer to the Glossary that we have set out at the end of the Policy, if there is any terminology used in this Privacy Policy that you are unfamiliar with or that you don't fully understand.

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This Notice will inform you as to how we collect and process your personal data, including when you visit our website (regardless of where you visit it from) or when you otherwise provide personal data to us via other means (such as over the telephone, via our online portal, online booking systems, via email or by text messages / social messaging apps) and

tell you about your privacy rights and how the law protects you.

We have appointed a privacy compliance manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any request to exercise your legal rights, please contact the privacy compliance manager using the details set out below.

1. Important information and who we are

Purpose of this privacy policy

This privacy notice aims to give you information on how Travel Places collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition.

We are committed to safeguarding the privacy of all individuals, including children and young people. In certain cases, we may collect personal information about individuals under the age of 18, as outlined in the Data We Collect About You section.

We may collect personal data about children and young people in one of the following ways:

- From an organising body (such as a school or youth group) that has obtained the necessary parental or guardian consent to share and process the child's data.
- Directly from parents or guardians, where we will request and obtain consent ourselves, if applicable.

Children have the same rights over their personal data as adults. These include the right to access, correct, or delete their data. In some cases, a parent or guardian may exercise these rights on the child's behalf.

For more details on these rights and how to exercise them, please refer to Your Legal Rights section of this privacy policy.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Contact details

Our full details are:

Full name of legal entity: Travel Places (WS) Ltd

Title of data privacy manager: Privacy Compliance Manager

Email address: privacy@travelplaces.co.uk

Postal address: Podium House, 61 Chapel Road, Worthing, West Sussex BN11 1HR

Telephone number: 01903 832888

You have the right to make a complaint at any time to the Information Commissioner ('ICO'), the United Kingdom supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on **13 August 2025**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

This website may include links to third-party websites, plug-ins, and application. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice at every website your visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, passport number, and expiry date.
- Contact Data includes billing address, delivery address, email address, and telephone numbers
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login details, browser type, and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website and other online booking tools/portals.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products, and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose.
- Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website



feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories of Personal Data

In order to tailor certain aspects of a travel booking to your individual needs, Travel Places may process certain 'special category' information about you. Special category data encompasses sensitive personal information which may reveal:

- Racial or ethnic origin of the data subject
- Dietary requirements which may disclose your religious or philosophical beliefs
- Genetic data
- Biometric data
- Health

Please note that we will only process this information if it is volunteered to us, either via a traveller profile or when transacting an individual booking. If you do not wish for this information to be processed then you may of course withhold it, on the understanding that Travel Places may not be able to meet your full personal requirements.

We may collect information on your health and religion to help us provide an appropriate service to you

If you fail to provide your personal data

Where we need to collect personal data by law, or where we are acting as an agent and need to collect personal data to enter you into a contract with the supplier of your chosen travel arrangements under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. IATA Resolution 830d

To address the growing demand for better customer service management in the event of a travel disruption (flight cancellation, delay or schedule change), airlines have made a major investment in developing pro-active customer notification systems. IATA has therefore issued Resolution 830d, whereby airlines will now use traveller contact information provided (phone number and/or email) to communicate any operational notifications to travellers.

Why is it important that participating airlines have customer contact information?

This new standard ensures that travellers have access to relevant and useful information in an operational disruption, limited to travel disruptions including flight cancellations, delays or schedule changes.

Phone numbers are already provided to airlines, however, our systems will now automate the process of providing the required IATA information in a specific format.



Please communicate to your travellers that IATA regulations require traveller's mobile phone number and/or email address in their booking to enable airlines to notify travellers of any flight disruptions or changes.

If you do not want to provide these details for your travellers, we will add generic contact details for Travel Places and will then look to communicate to your travel team directly any urgent information.

4. Group Travel and online Check-In Disclosure

When participating in airline group travel bookings, to use applicable airline online check-in platforms, please be aware that, within these systems, other passengers within your company included in the same group may be able to view details—such as full names, seat selection, executive card numbers and check-in status. It is the responsibility of the Client's booking agent to notify all passengers.

By choosing to use these platforms, passengers consent to this visibility for the purpose of streamlining group coordination and fulfilling airline requirements. This access is restricted to members of the same booking reference and is designed to facilitate shared itinerary management. If any members of the Team do not consent then we would be unable to open online and app check in facility for your company. Any concerns should be discussed with your Travel Places Account Manager.

5. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or corresponding with us in person or by post, phone, email or otherwise. This includes personal data you provide when you

- apply for our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- where you register to attend an event organised by us or on behalf of a supplier;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below

Your Employer.

Technical Data from the following parties:

- Analytics providers (such as Google based outside the European Union);

- Advertising networks (which may be based outside the European Union); and
- Search information providers (which may be based outside the European Union).

Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

Identity and Contact Data from data brokers or aggregators.

Identity and Contact Data from publicly available sources.

6. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- When we are acting as an agent, where we need to enter you into a contract with the supplier of your chosen travel services.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

PURPOSE / ACTIVITY	TYPE OF DATA	LAWFUL BASIS FOR PROCESSING INCLUDING THE BASIS OF LEGITIMATE INTEREST
To register you as a new customer	a) Identity b) Contact c) Financial	Performance of a contract with you
To process and deliver your product / service including (a) Manage payments, fees and charges	a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debt due to us)



(b) Collect and recover money owed to us		
To handle special category data, including biometric passport information to facilitate your travel related bookings	a) Identity b) Contact c) Biometric	(a) Performance of a contract with you (b) The data subject has given explicit consent to the processing of those personal data for one or more specified purpose
To manage our relationship with you which will include (a) Notifying you about changes to our terms and privacy policy (b) Asking you to leave a review or take a survey	a) Identity b) Contact c) Profile d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interest (to keep our records updated and to study how customers use our products / services)
To enable you to partake in prize draw, competition or complete a survey	a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interest (to study how our customers use our products / services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Identity b) Contact c) Technical	(a) Necessary for our legitimate interest (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	a) Technical b) Usage	(a) Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to	a) Identity b) Contact c) Technical	(a) Necessary for our legitimate interests (to develop our products /



you about goods or services that may be of interest to you	d) Usage e) Profile	services and grow our business)
To manage access to relevant Online systems / booking tools to manage relevant travel related services	a) Identity b) Contact c) Technical d) Usage e) Profile	(a) performance of contract with you

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Please contact the data protection manager should you wish to discuss how your personal data is used.

Promotional Offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Travel Places group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transaction.

Cookies

A cookie is a file containing an identifier that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

It is not typical for a cookie to contain any personal data, but the information we hold about you may be linked to the information stored in and obtained from the cookies.

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some part of our website may become inaccessible or not function properly.

For more information about the cookies we use, please [click here](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. Disclosure of your personal data

We may share or disclose your personal data with the parties set out below:

- To internal third parties within our group of companies insofar as reasonably necessary for the purposes, and on the legal bases, as set out in this privacy notice.
- With travel suppliers (for example airlines and hotels) and travel service providers (for example car hire companies, ground agents and online booking/management providers).
- To our insurers and/or professional advisers where it is reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out of court procedure.
- Specific third parties such as our IT developers, service providers and hosting providers, advertising providers and networks, site analytics providers, medical service providers, and credit card screening companies
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. International transfers

We may share your personal data outside the European Economic Area ('EEA').

Some of our third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

It will be passed by Travel Places to the partner or partners who provide us with the technology necessary to process your requirements; these organisations are Other (or 'Sub-') Processors of your information and our relationships with them are managed accordingly, with contractual safeguards appropriate to their geographical location.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is

implemented

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see European Commission: EU-US Privacy Shield

Alternatively, your data may be transferred outside the EEA when it is necessary to do so for the performance of a contract between you and us or for the performance of pre-contractual steps taken at your request.

Please Contact Us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law, we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.



In some circumstances, we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data
- Request correction of your personal data
- Request erasure of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

12. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in Travel Places acting as joint controllers or processors and who are based in the United Kingdom and provide IT and system administration services and undertake leadership reporting.

External Third Parties

Suppliers of travel services acting as either Controller or processors based in the country to which you are travelling and who provide the travel services that make up any booking of travel services that you make with us.

Service providers acting as processors based in the European Union who provide IT and system administration services.

Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the European Union who provide consultancy, banking, legal, insurance and accounting services.

HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Travel Places uses online services such as a Global Distribution System (GDS), online booking tools, group management tools or various airline online booking sites whom we define as other or 'sub-' processors of personal information according to data protection legislation.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove



personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful but you do not want us to erase it;
- (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.