# **PRIVACY POLICY**

Outgoing Ltd and Outgoing Events Ltd takes the privacy of our customers' and others data very seriously. Please read the following policy to understand how we will collect and use your personal data and in this policy we set out what information and data we collect, what we use it for and also who we may share your personal data with. If this policy changes and you have made a booking with us then we will let you know via email.

Outgoing is the Data Controller and is referred to in this Notice as "we" or "us".

#### When do we collect your data?

We can collect data on you from a variety of different sources, this will vary depending upon your interactions with us. This includes personal data provided:

- When you purchase, sign up to, enquiry or search for products or services from our websites or over the telephone, in person, by post or email or any other form of communication, such as social media, instant or direct messenger such as Facebook, Whats app or Twitter.
- When you become a subscriber to our email alerts, newsletters or complete a Contact Us Form.
- When you speak to our customer services personnel or other members of staff.
- Via explicit data capture measures, for example by entering competitions, promotions, completing surveys or market research or when you raise a complaint or issue with us.
- Via implicit data capture measure such as studying which pages you read the most and the use of cookies on our websites.
- When you start to fill in a booking request or enquiry with us but do not complete a booking.
- When you create an account on our website and/or enter or complete information onto online forms.
- When you click on one of our adverts, including those shown on other websites such as Facebook or Twitter etc.
- When you purchase products or merchandise from us for example either in person at an event or via our website or over the phone.
- When you provide us with information regarding an issue or complaint relating to one of our products or services, including an accident, illness or an insurance claim.
- When you apply for a job with us or to be a freelancer or Rep for us.
- When you attend or participate in one of our events or promotions.

### What information and data do we collect about you?

The information and data that we collect varies from person to person and based upon your communications and interactions with us. However examples of some of the information and data that we may collect are set out below:

- Personal information about you, for example your name, marital status, age and date
  of birth, gender, address, other contact details such as telephone numbers, social media
  profile or information, email address, university and course details, sport or society
  membership, next of kin information, dietary requirements, preferences or specific
  travel or holiday requirements that you have.
- Information specific to your booking, such as room, hotel or food preferences etc.
- Information regarding your booking payment details, for example your Bank name and address, Sort Code, Account Number, payment card details (such as your debit or credit card details, including card number, expiry date and other information from your card). This also includes details regarding the amount and frequency of payments that you make and how you make these payments.
- Advance Passenger Information, including information from your Passport (such as Passport Number, place of issue etc), data relating to Travel Visas and other information necessary to facilitate travel, holiday or other booking arrangements.
- Other information that you provide to us, such as your comments, job enquiries, Rep enquiries, complaints, preferences, instructions or other communications that we have between you and us. Please note that sometimes we may have to collect some additional information from you, which is specific to you, for example if you choose to purchase travel insurance from us information regarding your health, past illnesses and information in relation to an insurance claim, such as accident or illness details, lost property etc.

# What do we do with your personal information and data?

We use your personal data in a variety of ways, as set out below (including the legal basis for doing so):

- When you enquiry about or purchase a product or service from us, we may need to
  collect and use information about you to process the transaction or enquiry, to provide
  or fulfil your order, booking or the contract between us and also to provide you with the
  service or product. This information and data includes but is not limited to the data
  referred to above.
- We also need to use your personal data in order to process refunds or return of damage deposits to you, where applicable.
- We also use your data to manage or improve the services that we offer and the use of our website.
- We use your personal data when you complete or partially complete online bookings or enquiry forms and may contact you using this data to assist you with your booking or to complete that booking.
- We may contact you using your personal data to offer you the opportunity to take part in competitions, prize draws, surveys etc this is for legitimate business purposes and to allow the development and growth of our products and services

- We may also need to use your data to deal with and manage security (such as on an
  event), accidents, illnesses or other circumstances where it is necessary to use your
  personal data or specifically information regarding your health and insurance.
- We also use personal data for market research and marketing purposes, this includes sending you information and emails regarding promotions, events, keeping you up to date, offers and promotions – we usually only do this when we have your consent to do so or it is required in relation to offer you customer service support in relation to your booking, enquiry or contract with us.
- We are also legally required sometimes to obtain and use certain information or data from or about you.
- Unless we have your express consent we will only disclose personal data to third parties
  if this is required for the purpose of completing your transaction, booking or contract
  with us. This is of course subject to the provision that we may disclose your data to
  certain permitted third parties, such as affiliated companies or suppliers or our own
  professional advisors who are bound by confidentiality codes and when we are legally
  obliged to disclose your data.
- We may use your personal data for the purposes of carrying out data analytics so that we
  can optimise your customer experience and also for legitimate business purposes, such
  as to assist with the running of an event or for the purposes or security or safety and also
  for the purposes of developing products and services and to assist us in establishing a
  marketing strategy by reviewing the data of customers wo participate in particular
  events.
- We retain and use your personal data and information to provide you with the best online e-commerce experience by providing you with a personalised service and to give you details of offers that we think will be of interest to you.
- We may also use the information to process any transactions or bookings that you undertake with us and for internal administration and analysis for legitimate business purposes, and;
- We may contact you to provide customer service support and provide you with a better customer experience and therefore we may use your personal data to contact you for example by phone, email, text, post or via social media and we may also use your personal data to provide you with clarification or information.
- Information provided by you to us may be shared with your group leader to enable them to communicate important information regarding your holiday to you and to enable the group leader (when we refer to a group leader in this document we mean the main person who liaises with us throughout the process on behalf of the group that you are part of for us to provide quotes, travel offers and the main point of communication) to assist us in the safe and effective delivery of the holiday that you have booked, for example the sharing of information is necessary so that the group leader can allocate rooms and coaches together with (in certain circumstances) contacting your next of kin

in the case of an emergency amongst for other reasons. Only essential data required to provide the holiday services will be disclosed. Information may also be shared with your Students' Union or University for duty of care and welfare purposes. Any sharing of data will be solely for the delivery of the holiday you have booked and not for any marketing purposes.

Our Company reps, event security staff and event management have permitted access
to your information for a limited time period for us to deliver the best possible holiday
experience to you and for duty of care and welfare purposes.

We do not sell your personal data onto third parties.

Our legal basis for processing your Personal Data is set out in the bullet points above and we also confirm that we will collect and use your Personal Data if one or more of the following legal basis apply and enable us to do so:

- We have your consent to do so i.e. by making a booking with us you agree that we may process your data.
- It is in our or a third party (such as one of our partners or suppliers) legitimate interest to
  do so, however your rights and interests are not overridden by this for example we
  may do so to tailor your experience or package to enhance and personalise your booking
  or interactions with us and therefore we may contact you about other products or
  services that we think you may be interested in or that compliment your existing
  booking.
- It is necessary and required that we do so to fulfil a contract or booking or enquiry that you have made with us for example, to fulfil your booking or manage your account before, during or after an event, including if you raise a complaint or issue with us.
- It is required or necessary to protect you or another person or group of persons i.e. in an emergency situation or as a result of a natural disaster or if you or someone else requires medical assistance.
- It is in the public's interest or we have permission or authority to do so, for example it is required for security reasons or insurance purposes.
- Or it is necessary for us to do so to comply with our legal obligations to do so, i.e. to provide data or information to Border or Passport control or anti-terrorism purposes.

### Marketing communications and practices

We may from time to time contact you in a variety of ways to send you offers or news that we think is relevant to you, for example this may be via in person, email, text, phone or via social media etc.

Further, we or one of our partners may also send you information about other companies or their products or services. However, we will only do this if you have previously agreed to these types of marketing communications and have not later withdrawn your consent or if you have made a booking or contract with us and have not advised us that you do not wish to be contacted in this way.

If you decide that you no longer wish to be contacted by us for marketing purposes then you

can either inform us of this by clicking the unsubscribe link on our marketing emails or by contacting us to advise us. If you do this, you will still receive communications from us relating to for example your booking or the services that we are providing to you.

Please note that sometimes we use third parties to send our marketing to you, but these third parties do not have permission to send you marketing regarding their own products or services.

We sometimes send you marketing information regarding partners that we use and who provide services and products which are closely linked to our own products and services.

# How we may share your personal data with suppliers, group leaders and other partners

So that we can provide and fulfil your booking or our products and services we may need to share your personal data with supplies, group leaders and companies regarding your booking such as hotel and accommodation partners, ferry companies, in relation to excursions or other suppliers of sports, sporting facilities or food, insurance providers, border control and other Government agencies for example.

In addition to the above, we also work with suppliers in relation to the provision of services and to carry out certain functions on our behalf such as IT support, storing and processing of data, marketing, advertising, booking system, hosting companies and processing payments together with partners to assist with delivering the event, product or service that you have booked with us.

Further, there may also be other reasons that we need to share your personal data such as credit reference agencies or for the purposes of fraud prevention. Also, we may need to share your data with third parties such as Courts or professional or legal advisors for the purposes of protecting or exercising our legal rights or where sharing or disclosing data is permitted or required by law.

Information provided by you to us may be shared with your group leader to enable them to communicate to you important information regarding your holiday and to enable the group leader to assist us in the safe and effective delivery of the holiday that you have booked, for example the sharing of information is necessary so that the group leader can allocate rooms and coaches together with (in certain circumstances) contacting your next of kin in the case of an emergency amongst for other reasons. Only essential data required to provide the holiday services will be disclosed. Information may also be shared with your Students' Union or University for duty of care and welfare purposes. Any sharing of data will be solely for the delivery of the holiday you have booked and not for any marketing purposes.

Our Company reps, event security staff and event management have permitted access to your information for a limited time period for us to deliver the best possible holiday experience to you and for duty of care and welfare purposes.

# Protecting your personal data and when do we send this outside the EEA (European Economic Area)

It is important to you that we protect your personal data and we have taken steps to put in place measures to help protect your personal data and also to protect it from accidental loss, unauthorised access or use or from unlawful alteration or disclosure.

Please note that the personal data that we collect may be transferred to and stored outside the EEA or may be processed by one of our suppliers or third parties who we use to provide our products and services who are outside the EEA or we may do so if we have to comply with a legal obligation and again we put in place measures to protect your data when used in such a way.

### Your rights in relation to personal data

- You have a right to ask us to provide you with a copy of the personal data that we hold (most of this data would also be accessible via your online customer account). If you wish however to request a copy of the personal data that we hold about you then you can write to us and ask for a copy at Outgoing, 3 The Stables, Wilmslow Road, Manchester, M20 5PG
- You have the right to ask us to correct any personal information about you which you believe is incorrect. You can do this by contacting us in writing at the above address.
- You can ask us to rectify or erase your personal data or to stop processing your personal
  data in certain circumstances or where it is possible you can ask for your personal data
  to be sent to another company.
- We will keep your data updated or may erase your data (this includes if you request us to do so) unless we must keep your personal data for legitimate business purposes or if required legally to do so.
- You also have the right to contact us if you are not happy or if you have a complaint about how we process your personal data including how we use, collect or store the same.
- You have the right to know how we use your personal data and we hope that we have set this out in this Privacy Policy but if you have any further questions please contact us by post at the address referred to above.
- Further, you also have the right to ask us not to use your personal data for marketing purposes see further information provided above too.
- Finally, in addition to the above you have the right to withdraw your consent that you have given to us to use your personal data.

### How we protect your personal data?

We have put in place appropriate security measures to help protect your personal data and to help prevent your personal data from accidental loss and also from unauthorized use, access, alteration and disclosure of the same. We only allow persons who are required to do so to process your personal data for legitimate business purposes.

You are also required to ensure that you protect the security of your own data, i.e. via adequate password protection and appropriate internet security being installed on laptops/computers.

## How long to we retain your personal data for?

We will keep and retain your personal data only for as long as it is necessary to do so for the uses and purposes set out in this Privacy Policy including as long as is necessary to comply with our legal and other requirements, such as for accounting purposes or for regulatory requirements together with as required for analytical or other legitimate business purposes (in some circumstances we will after a certain period of time anonymise your data so that we can continue to use it for historic or analytical purposes and in which case we may use this data for an indefinite period of time). After this, we will then securely erase your personal data.

# Cookies policy and third party links on our website

Please see our separate Cookies Policy on the footer of our website. Cookies allow our website to collect, gather and store a variety of data on the device that you are using to access our website, such as a laptop, computer or mobile phone and they allow our website to fully function and provide you with all our features to give you the best user experience. However, you can choose whether to allow or refuse cookies or change your settings regarding cookies, but this may limit or affect the function and accessibility of our website.

Our website also includes links to third party websites and please note that by clicking on those links it will allow those third parties access to your personal data and please therefore, also read the third parties own privacy policy as this may differ from our own.

#### **Further information regarding this Privacy Policy**

We may from time to time make changes to our Privacy policy and this Policy replaces all previous versions. If we make changes to our Privacy Policy and you have made a booking with us then we will email you to inform you of the new policy.

If you require any other information please feel free to contact us using the contact details provided below:

We have appointed a Data Protection Officer (Alex Cropper) who is responsible for dealing with any issues or concerns in relation to this Privacy Policy and our contact details are set out below:

Address: Outgoing 3 The Stables, Wilmslow Road, Manchester, M20 5PG info@outgoing.co.uk

Telephone Number: 0161 768 6331

Also, if we are unable to deal with any issue or concern that you have then you do have a right to make a complaint to the Information Commissioner's Office, which is an independent authority and supervises UK data protection and UK information rights. Their contact details can be found on their website <a href="https://www.ico.org.uk">www.ico.org.uk</a>.

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