



Websuite Privacy and Cookies Policy

Prepared by
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Guestline

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Guestline Ltd
Guestline House
Shrewsbury Business Park
Shrewsbury
SY2 6LG

Privacy Policy

Last Updated: May 2018

Guestline (“we,” or “us”) is committed to protecting the information that you share with us online, and explaining how we collect, process, and share that information. We provide you with the notice below in English only to avoid any misinterpretations caused by a language translation. If necessary, please seek the proper advice, or avoid use of this website.

Summary of Key Issues

Collection	We collect Personal Information about you that you provide to us or that we obtain while you are using the Site.
Protection	We employ reasonable and current technical, administrative, and physical safeguards that are designed to prevent unauthorized access, maintain data accuracy, and designed to ensure correct use of Personal Information.
Use	We use Personal Information to provide you with services from our Site, to build features that will make the services available on the Site easier to use, to contact you about these services, and to send advertisements, marketing material or other offers that we think might be of interest to you.
Marketing and Choices	You have control on how we use Personal Information for marketing. You can exercise your control in any marketing communication.
Sharing	We do not share your data with any other 3rd parties.
Cookies	Our Site uses cookies and other similar technologies.
Access and Data Subject Rights	We understand that you may want to change, access, or delete your Personal Information. You may do so by accessing your profile or by contacting us.
Children	Persons under the age of 16 are not eligible to use any services on our Site.
Changes	We will provide notice of any material changes to this Privacy Policy by posting a prominent notice on our Site and/or emailing you.
Contact Us	Should you have any questions, concerns or comments, please contact us.

Scope and Information that this Privacy Policy Covers

This Privacy Policy applies to information collected on our websites, mobile applications, cloud-based services, or controlled widgets embedded in communication platforms with a link to this Privacy Policy (collectively, the "Site"). It covers how we collect, use, share, and otherwise process Personal Information as of the date that this Privacy Policy is posted. It does not apply to any other information collected by us through any other means. By "Personal Information," we mean information that identifies or can identify you personally.

The Site may contain links to third-party websites. We do not own, operate or control the websites of those third parties. Accordingly, this Privacy Policy does not apply to any websites maintained or operated by unaffiliated third parties. When you click on those links, you will go to a third party website where you will be subject to that website's privacy policy, which we encourage you to read. We are not responsible for the privacy practices of those other websites and we expressly disclaim any liability for their actions, including actions relating to the use and disclosure of Personal Information.

Personal Information We Collect About You

We collect your Personal Information on the Site to enhance the services we offer you, maintain and improve the Site, protect the security of you and our Site, comply with legal obligations, and inform you about other services and products that may be available through us, our affiliated companies, or through our marketing alliances. We collect Personal Information about you when you interact with or utilize services offered on this Site, such as:

- Creating a profile with us;
- Consenting to marketing communications;
- Applying for a job;
- Submitting comments, reviews, or other user-generated content;
- Connecting or interacting with us through social networks (e.g., Facebook, Google+, Twitter); or
- Requesting customer or technical support.

Personal Information includes:

- Name;
- Postal or billing address;
- E-mail address;
- Telephone or mobile number;
- Payment card information;
- Government identification (e.g., passport identification to verify traveler identities);



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- Location via IP address;
 - Device being used (for our mobile site);
 - Cookies and similar technologies;and
 - Other relevant data.

Even if you do not provide us with any Personal Information, we collect certain non-personal information about how you use our Site. This information cannot identify you and is used for statistical purposes only.

Use and Sharing of Personal Information

We only process and share your Personal Information, including sharing with service providers or other external entities, to the extent reasonably necessary to fulfill your requests and meet our legitimate business and legal objectives. When we disclose Personal Information to external entities to perform services for us, we establish by contract that they may access your Personal Information only for the purposes of performing those services. We may also use what we know about you to offer you other products and services. We may combine your online information with information collected from offline or online sources, or information we already have. We may also use and disclose certain Personal Information to our affiliated companies and others for any purpose allowed by law.

We generally process and may disclose your Personal Information to others to:

- Provide you with products and services, including authenticating authorized users, and marketing our products and services;
- Perform certain services or other transactions initiated by you;
- Respond to your questions, complaints, or reviews of our product or services;
- Send you communications about online transactions, product information, ads and promotions, electronic newsletters, or other notices you requested or offers tailored to you;
- Enable our advertisers, where appropriate, to provide you with more personalized content, and track the effectiveness of certain advertising campaigns;
- Comply with applicable law, obey judicial orders, cooperate with law enforcement authorities, or prevent any suspected illegal activities;
- Help us run our business; or
- For any other everyday business purposes, such as product development and Site administration.

Processing Basis and Consequences

Certain jurisdictions, including those in Europe, require the identification of the legal grounds for the collection, use, sharing, and other processing of Personal Information. We rely on the following legal grounds for its collection, use, sharing, and other processing of Personal Information as described in this Privacy Policy:

- Necessary to provide information or otherwise carry out the performance of a contract with you as an individual;
- Our legitimate interests, including:
 - Customer relationship management and other forms of marketing and analytics;
 - Fraud prevention, misuse of company IT systems, or money laundering;
 - Physical, IT, and network perimeter security;
 - Internal investigations; and
 - Intended mergers and acquisitions.
- Compliance with legal obligations and/or defence against legal claims, including those in the area of labour law, social security, and data protection, tax, and corporate compliance laws.
- Protection of the vital interests of any individual;
- Performance of a task carried out in the public interest or in the exercise of official authority vested in us; and
- Consent, as permitted by applicable law.

Providing us with Personal Information is voluntary, but your refusal to provide Personal Information for the above-mentioned purposes may affect our ability to fulfill our contractual obligations.

Your Rights Concerning your Personal Information

You have the following choices regarding our use and disclosure of your Personal Information:

- **Marketing Communications.** If you no longer wish to receive any marketing communications, remain on a mailing list to which you previously subscribed or receive any other communication from us, please follow the unsubscribe link in the relevant communication. Even after you opt-out or update your marketing preferences, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, surveys, or any questions regarding a specific reservation.
- **Cookies and Similar Technologies.** Please review your browser or computer settings for certain cookies and see below to exercise certain choices regarding cookies.

You are not required to provide all Personal Information identified in this Privacy Policy to use our Site, but certain aspects of our Site may not be available to you. However, you can use our services without consenting to non-essential cookies or direct marketing emails; the only consequence is that we will communicate less to you regarding our services, we may not be able to provide the

support you seek, and you may miss out on attractive promotions and news about services.

Europe and certain other non-US jurisdictions maintain local data protection regulations that confer certain data protection rights on individuals. If applicable, and you wish to exercise any of these rights, please contact us as set out below.

- **Right of access:** You have the right to obtain from us confirmation as to whether or not Personal Information concerning you is processed, and, to request access to the Personal Information. The access information includes, among other things, the purposes of the processing, the categories of Personal Information concerned, and the recipients or categories of recipient to whom the Personal Information have been or will be disclosed. This is not, however, an absolute right, and the interests of other individuals may restrict your right of access. You may have the right to obtain a copy of your Personal Information undergoing processing.
- **Right to rectification:** You have the right to obtain from us the rectification of inaccurate Personal Information about you. Depending on the purposes of the processing, you have the right to have incomplete Personal Information completed, including by means of providing a supplementary statement.
- **Right to erasure (right to be forgotten):** Under certain circumstances, you have the right to obtain from us the erasure of Personal Information concerning you, and we may be obligated to erase that Personal Information.
- **Right to restriction of processing:** Under certain circumstances, you have the right to obtain from us restriction of processing your Personal Information. In that case, your data will be marked and may only be processed by us for certain limited purposes.
- **Right to data portability:** Under certain circumstances, you have the right to receive the Personal Information about you, which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that data to another entity without hindrance from us.
- **Right to object:** Under certain circumstances, and at any time, you have the right to object, on grounds relating to your particular situation, to the processing of your Personal Information by us, and we can be required to no longer process your Personal Information.

Where permitted by applicable law, you also have the right to lodge a complaint with a competent data protection supervisory authority.

Security of Your Information

We maintain reasonable technical, electronic, and organizational security procedures to maintain the security of Personal Information, and safeguard Personal Information against unauthorized or unlawful processing and/or against accidental or unlawful loss, alteration, disclosure or access. Our security procedures include contractual terms with any contractors, agents or data processors that require such entities to protect the security and confidentiality of Personal Information in accordance with our standards. While we strive to protect your Personal Information, we cannot

ensure the security of the information you transmit. It is your responsibility to safeguard any email or password that you have created or used in connection with any service or site and to notify us if you ever suspect that the security and confidentiality of such email or password has been compromised in any way.

Retention and Storage of Your Information

We will maintain Personal Information for as long as we are required to do so by applicable law(s), or for as long as necessary for the purpose(s) described above for which it is processed. We will delete Personal Information when it is no longer needed and/or take steps to properly anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject) and, in any case, upon expiration of the maximum storage term set forth by applicable law.

Children

We do not knowingly collect Personal Information from children under the age of 16, and users under the age of 16 should not submit any Personal Information to us. If we have actual knowledge that Personal Information about a child under 16 years old has been collected, then we will take the appropriate steps to delete this Personal Information.

Changes to our Privacy Policy

We may change this policy from time to time. If we make any material change in how we collect, use, disclose, or otherwise process Personal Information, we will prominently post notice of the change on our site for at least thirty (30) days before putting the change into effect. Where required to do so by law, we may seek your prior consent to any material changes we make to this Privacy Policy. Otherwise, your continued use of our site after we make changes to this policy is deemed acceptance of those changes. If any proposed change is unacceptable to you, you may request that we remove your Personal Information (and/or that of other individuals for whom you made your travel reservations) from our records.

Contact Us

If you have any questions or comments regarding this Privacy Policy or our privacy practices in general, please contact us as detailed below. You may also have a right to lodge a complaint with a supervisory authority.

Email: guestline@journey.travel

Mailing Address:
Guestline House,
Shrewsbury Business Park,
Shrewsbury,
SY2 6LG,
United Kingdom.

WebSuite Cookie Policy

Background

This website ("Our Site") uses Cookies and similar technologies in order to distinguish you from other users. By using Cookies, We are able to provide you with a better experience and to improve Our Site by better understanding how you use it. Please read this Cookie Policy carefully and ensure that you understand it. Your acceptance of Our Cookie Policy is deemed to occur if you continue using Our Site. If you do not agree to Our Cookie Policy, please stop using Our Site immediately.

1. Definitions and Interpretation

In this Cookie Policy, unless the context otherwise requires, the following expressions have the following meanings:

"Cookie"	means a small file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site;
"Cookie Law"	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003 and of EU Regulation 2016/679 General Data Protection Regulation ("GDPR");
"Personal Data"	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data, as defined by EU Regulation 2016/679 General Data Protection Regulation ("GDPR"); and
"We/Us/Our"	means Guestline Limited, company no.02661520, whose registered office is: Guestline House, Shrewsbury Business Park, Shrewsbury, SY2 6LG, United Kingdom (" Guestline ").

2. Information About Us

Our Site owned and operated by Us, Guestline

If you would like to know more about how We use Cookies, please contact us at guestline@journey.travel.

3. How Does Our Site Use Cookies?

Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our products and services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

By using Our Site, you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for website usage insights and advertising purposes. By collecting this data, we can continually improve the website experience. These cookies are small text files which are

stored on your computer by your web browser. They are not computer programs, and they can't read any other information saved on your hard drive. They can't spread viruses or obtain sensitive user information such as email addresses and credit card numbers.

All Cookies used by and on Our Site are used in accordance with current Cookie Law. We may use some or all of the following types of Cookie:

- **Strictly Necessary Cookies**

A Cookie falls into this category if it is essential to the operation of Our Site, supporting functions such as logging in, your shopping basket, and payment transactions.

- **Analytics Cookies**

It is important for Us to understand how you use Our Site, for example, how efficiently you are able to navigate around it, and what features you use. Analytics Cookies enable us to gather this information, helping Us to improve Our Site and your experience of it.

- **Functionality Cookies**

Functionality Cookies enable Us to provide additional functions to you on Our Site such as personalisation and remembering your saved preferences. Some functionality Cookies may also be strictly necessary Cookies, but not all necessarily fall into that category.

- **Targeting Cookies**

It is important for Us to know when and how often you visit Our Site, and which parts of it you have used (including which pages you have visited and which links you have visited). As with analytics Cookies, this information helps us to better understand you and, in turn, to make Our Site and advertising more relevant to your interests. Some information gathered by targeting Cookies may also be shared with third parties.

- **Third Party Cookies**

Third party Cookies are not placed by Us; instead, they are placed by third parties that provide services to Us and/or to you. Third party Cookies may be used by advertising services to serve up tailored advertising to you on Our Site, or by third parties providing analytics services to Us (these Cookies will work in the same way as analytics Cookies described above).

- **Persistent Cookies**

Any of the above types of Cookie may be a persistent Cookie. Persistent Cookies are those which remain on your computer or device for a predetermined period and are activated each time you visit Our Site.

- **Session Cookies**

Any of the above types of Cookie may be a session Cookie. Session Cookies are temporary and only remain on your computer or device from the point at which you visit Our Site until you close your browser. Session Cookies are deleted when you close your browser.

Cookies on Our Site are not permanent and will expire as indicated in the table below.

For more details of the personal data that We collect and use, the measures we have in place to protect personal data, your legal rights, and our legal obligations, please refer to our Privacy Policy.

For more specific details of the Cookies that We use, please refer to the table below.

4. What Cookies Does Our Site Use?

The following third party Cookies may be placed on your computer or device:

Name of Cookie	Purpose & Type	Provider
DoubleClick	These cookies identify user sessions, passing information back to Google Analytics. With this information, we can improve the website experience.	https://www.doubleclickbygoogle.com/
Google Tag Manager	These cookies identify user sessions, passing information back to Google Analytics. With this information, we can improve the website experience.	Google.com
Facebook	This cookie identifies user sessions, passing information back to Facebook's advertising platform. This allows us to communicate the latest offers and events via Facebook and Instagram ads.	Facebook.com
Fullstory	To track and improve the use of the website	https://www.fullstory.com/
Omniconvert	Session cookies to provide specific web content to relevant users	https://www.omniconvert.com/
Responsetap	Adds unique phone numbers so that calls derived from the website can be tracked	https://www.responsetap.com/

Our Site uses analytics services provided by <<Insert Name of Analytics Service Provider(s)>>.Google.com, Facebook.com and Responsetap.com. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

The analytics service used by Our Site use analytics Cookies to gather the required information. The analytics services used by Our Site uses the following analytics Cookies:

Name of Cookie	Purpose & Type	Provider
Universal Analytics	These cookies identify user sessions, passing information back to Google Analytics. With this information, we can improve the website experience.	https://policies.google.com/privacy
Facebook Pixel	This cookie identifies user sessions, passing information back to Facebook's advertising	https://www.facebook.com/

	platform. This allows us to communicate the latest offers and events via Facebook and Instagram ads.	
Response Tap	This cookie identifies user sessions, passing information back to Response Tap's reporting platform. This allows us to see which page a user made a phone call from.	https://www.responsetap.com/

5. Control

In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed.

The links below provide instructions on how to control Cookies in all mainstream browsers:

Google Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>

Microsoft Internet Explorer: <https://support.microsoft.com/en-us/kb/278835>

Safari (macOS): https://support.apple.com/kb/PH21411?viewlocale=en_GB&locale=en_GB

Safari (iOS): <https://support.apple.com/en-gb/HT201265>

Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-Cookies-website-preferences>

Android: <https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en>

6. Changes to this Cookie Policy

We may alter this Cookie Policy at any time. Any such changes will become binding on you on your first use of Our Site after the changes have been made. You are therefore advised to check this page from time to time.

In the event of any conflict between the current version of this Cookie Policy and any previous versions, the provisions current and in effect shall prevail unless it is expressly stated otherwise.