

# PRIVACY POLICY

## INTRODUCTION

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This version was last updated in May 2018.

At CTI we value your privacy and are committed to ensuring that your privacy is protected. This privacy policy explains how we use the information we collect about you and the procedures we have in place to safeguard your privacy. Please note that we may update and amend this privacy policy from time to time.

Please note that if you work for an organisation that is a client of CTI and you provide us with personal data in connection to that service, we will process your personal data on behalf of your employer.

We own and operate several websites including but not limited to [www.cti.co.uk](http://www.cti.co.uk) and [www.ctimarine.com](http://www.ctimarine.com) (the “Websites”). This privacy policy applies to information obtained through the Websites and any other website owned and operated by us from time to time, in addition to the information provided to our consultants employed at our offices.

This website is not intended for children and we do not knowingly collect data relating to children.

### WHAT'S IN THIS POLICY?

This policy tells you:

- What information we might collect about you
- How we collect that information
- How we use that information
- When we might disclose your information
- About the security of your information
- How long we will hold your information
- What your rights are

### Third-Party Links

Our websites may, from time to time, contain links to and from other websites including those of our suppliers. If you follow a link to these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

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'Personal information' means information from which someone else would be able to identify you as an individual.

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

- **Identity Data** includes full name, username or similar, marital status, title, date of birth
- **Contact Data** includes billing address, delivery address, email address and telephone numbers
- **Travel Data** includes passport number
- **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 data, browser type and version
- **Profile Data** includes your username and password, purchases or travel bookings made by you, meal preferences, feedback and survey responses
- **Usage Data** includes information about how you use our website, products and services
- **Marketing Data** includes your preferences in receiving marketing from us
- We may also collect **Special Categories** of personal data about you, this could include details about your health if relevant to your travel booking and religion for your meal preferences.

## HOW IS YOUR PERSONAL INFORMATION COLLECTED?

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

- **Direct interactions** - you or your employer may give us your identity, contact and financial data by filling in forms electronically or by corresponding with us by post, phone or email
- **Automated technology** - as you interact with our websites, we may automatically gather technical data about you. We collect this by using cookies and other similar technologies. Please see our cookie policy for further details

## HOW DO WE USE YOUR PERSONAL INFORMATION?

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We will use your data in the following circumstances:

- To perform the contract we have entered into with your employer
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests
- To comply with a legal or regulatory obligation
- Where you have given consent for our Sales Team to contact you

### 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 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 not required or permitted by law.

## PURPOSES FOR WHICH WE USE YOUR PERSONAL INFORMATION

Purpose/Activity	Type of Data	Lawful Basis for Processing including Basis of Legitimate Interest
To register you as a new traveller and build your profile	Name, email address, phone numbers, employer, physical address, passport number, gender and date of birth. If we book travel for your travel companions, we will collect similar information from them. You may choose to provide additional information when setting up your traveller profile which may include emergency contact information and health information	Performance of a contract with your employer
To book your travel	As well as your profile information, we collect travel (such as arrival and departure location, airline, hotel and car rental) and other information that may be required to book your travel. Special categories of information to provide accessibility and meal preferences may also be collected.	Performance of a contract with your employer
To process and deliver your travel a) Manage payments, fees and charges b) Collect and recover money owed to us	As well as above we also collect payment card information and details necessary to process these payments	a) Performance of a contract with your employer b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey	a) Identity b) Contact c) Profile d) Marketing	a) Performance of a contract with you b) Necessary to comply with legal obligation c) Necessary for our legitimate interests (to keep our records updated)
To enable you to partake in a prize draw, competition or complete a survey	a) Identity b) Contact c) Profile d) Usage e) Marketing	a) Performance of a contract with you b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website	a) Identity b) Contact c) Technical	a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation)

		b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	a) Identity b) Contact c) Profile d) Usage e) Marketing f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	a) Identity b) Contact c) Technical d) Usage e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

## MARKETING

If you have submitted personal information through this website and wish to have your details removed, or stop receiving communications from CTI, please contact [marketing@cti.co.uk](mailto:marketing@cti.co.uk).

We will never sell or share your personal information with other organisations for their direct marketing purposes.

## COOKIES

CTI uses cookies on its Websites. A cookie is a text file that identifies your computer to CTI's server. Cookies in themselves do not identify the individual user, just the computer used.

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 parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the cookie policy.

## DISCLOSURES OF YOUR PERSONAL INFORMATION

We may have to share your personal data with the parties set out for the purposes set out in the table above.

- Services providers means any third party with whom CTI interacts in its capacity as your authorised agent pursuant to your contact, including any third party that:
  - Provides travel services and to whom CTI makes bookings on your behalf, including airlines, hotels, car rentals and rail providers
  - Facilitates or processes bookings (whether electronically or otherwise) made by CTI on your behalf for travel services, including online booking tools or other software and travel agents
  - Processes applications to assist or enhance a person's ability to receive the benefits of the services, including passport and visa agencies
- 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 in our business, then the new owners may use your personal data in the same way as set out in this privacy notice

Where we subcontract services to third party service providers we require all such third parties to respect the security of your personal data and to treat it in accordance with the law. Please note that if travel or associated services are purchased for you pursuant to an arrangement between your employer and CTI then, due to CTI's status as a processor, the relevant service provider is responsible for the security of the personal data it receives and for compliance with applicable law; CTI is not responsible for the acts or omissions of such service providers.

## TRANSFER OF INFORMATION

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As a corporate travel management company many of our Service Providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

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:

- Adequacy decision is in place from the European Commission
- Model contract clauses are put in place
- The organisation adheres to the US Privacy Shield

## INFORMATION SECURITY

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CTI are strongly committed to keeping your personal information safe. We are governed by a comprehensive Information Security Management System to ensure data confidentiality, integrity and availability. Controls include physical security, data protection, regular vulnerability scanning and penetration testing, and strict access control policies. We limit access to your personal data to those 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.

A formal breach notification plan is in place detailing reporting lines and time frames for reporting internally. Should an incident occur that affects any customers materially, we will notify in accordance with contractual obligations.

## DATA RETENTION

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We 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.

## YOUR RIGHTS

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Under data protection laws, you have rights in relation to your personal data. You have the right to:

**Request access** to your personal data (more commonly known as a Subject Access Request). This enables you to receive a copy of the personal data we hold about you.

**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. Please note that online customers can amend their own personal details in their traveller provider; offline customers should contact their hub directly to advise them of changes.

**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 to continue to process it. Note, however, that we may not always be able to comply with your request for 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 and there is something about your personal situation which makes you 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:

- If you want us to establish the data's accuracy
- Where our use of the data is unlawful but you do not want us to erase it
- Where you need us to hold the data even if we no longer require it as you need to establish, exercise or defend legal claims
- 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 consent, we may not be able to provide certain services or products to you.

If you wish to exercise any of the rights set out above, please contact [governance@cti.co.uk](mailto:governance@cti.co.uk).

### Requests

Requests should be sent to [governance@cti.co.uk](mailto:governance@cti.co.uk) where, if required, they will be passed on to the appropriate Data Controller (your employer in most instances) to verify and approve.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights above). 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.

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.

We try to respond to all legitimate requests within 30 days. 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.

## FURTHER INFORMATION

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If you have any questions about how we process your personal information please contact [governance@cti.co.uk](mailto:governance@cti.co.uk) or The Data Protection Officer, CTI, 7<sup>th</sup> Floor, 111 Piccadilly, Manchester, M1 2HY.