

## **EU General Data Protection Regulation (GDPR) Notice**

By the very nature of the beTravelwise business model, the protection of personal and information is a high priority. We have always sought to ensure that rights of our clients and their people are respected and safeguarded in order to protect their privacy.

beTravelwise has always devoted resources to ensure the security, confidentiality, integrity and availability of the data we control and process. We are committed to continuously evaluating and improving our policies, standards, processes and information systems to keep data safe, effectively support our clients and business services, and to comply with legal requirements. We do not hold any sensitive data.

beTravelwise recognises the passing of the GDPR as an opportunity to evaluate and further enhance the effectiveness and resilience of our security framework with a particular focus on the rights of data subjects.

We have had an independent consultant review how we operate our processes, systems and data gathering activities in alignment with the existing EU Data Protection Directive and we are well positioned to fully comply with the General Data Protection Regulations.

Here at beTravelwise we take your privacy and the processing of your personal data very seriously. Therefore, we have prepared this Privacy Notice where we describe our contact details, information regarding what personal data we process and what rights you have towards us and how you may defend them. Always feel free to contact our customer support if you have any questions about our processing of personal data or this Privacy Notice.

**Contact Details to the Controller**

Name of the company:	Be Travel Wise Ltd
National company registration number:	09473903
VAT number:	GB213 6790 13
Country of operation:	United Kingdom
E-mail address:	hello@betravelwise.com
Phone number:	+44 (0)1672 500757
Postal address:	67 Westow Street, London SE19 3RW
Visiting address:	Unit 1a, Warren Farm, Marlborough SN8 3UU
Link to customer support:	<a href="https://betravelwise.com/contact-us/">https://betravelwise.com/contact-us/</a>

Contact details for the Controller's representative or Data Protection Officer:

Name:	Andrew Prior
Title:	Director
E-mail address:	andy@betravelwise.com
Phone number:	+44 (0) 07748 983575

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**What is personal data?**

“Personal data” is any information relating to an identifiable or identified person (you as a user). An identifiable person is someone who can be identified, directly or indirectly, for example by reference to an identification number or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity.

The processing of special categories of data, defined as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and data concerning health or sex life, is prohibited, subject to certain exceptions.

**Personal data which we handle**

Your personal data may only be processed by us with your given consent, when it is necessary for the performance of a contract to which you are a party, or when it is necessary for our compliance with a legal obligation. The processing of the personal data, the specific purposes for the processing, the legal basis for the processing, and for how long we store your personal data, is described below.

### Name

Your **name** will be processed by us when you contact us and when you use our learning management system, and the processing is necessary for the purposes of legitimate interest for us. Your name will be kept securely with us for the length of a contract relationship where you are a party and two years thereafter. We will store your name on our CRM system Five CRM, our cloud data storage providers Google and Microsoft, as well as LearnUpon, our learning management system. This sharing with third parties is necessary for our performance of our part of the contract.

### Email address

We will process your **email address** when you fill in the contact form on our website. We will store your email address on our CRM system Five CRM, our cloud data storage providers Google and Microsoft, as well as LearnUpon, our learning arrangement system, and the processing is necessary for the purposes of legitimate interests for us. Your email address will be kept securely with us for the length of a contract relationship where you are a party, and for two years thereafter. We will keep your email address on our newsletter list unless you request to be removed.

### Phone number

For contact purposes during our contract relationship, your **phone number** will be processed by us, as it is necessary for the purposes of legitimate interests for us. Your phone number will be kept for two years after the end of the contract relationship, and it will be stored on our CRM system Five CRM, our cloud data storage providers Google and Microsoft, as well as LearnUpon, our learning arrangement system.

### National insurance number

If you are a consultant paid by us, we are required by law to collect and process your **national insurance number**. It is necessary for us to perform on a legal obligation, and your national insurance number will be kept by us for the length of a contract relationship to which you are a party, and two years thereafter. This information will be shared with our payroll provider, Fitzgerald Mithia Springer.

### Passport or other information proving right to work in the United Kingdom

If you are an employee of beTravelwise, we are required by law to collect and process information that proves you are entitled to live and work in the United Kingdom, usually but not limited to a passport information page scan for British and Irish citizens. It is necessary for us to perform on a legal obligation, and this information will be kept by us for the length of a contract relationship to which you are a party, and two years thereafter. This information will be shared with our payroll provider, Fitzgerald Mithia Springer.

### Professional details

To ensure that we are in contact with the proper contact point within your organization, we may collect and process your **professional details**, as it is necessary for the purposes of legitimate interest for us. This category of personal data will be kept securely with us for the term of a contract where to which you are a party and for two years thereafter.

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**Summary of your rights towards us:**

You as a user have the possibility to claim several rights towards us. Such rights are listed here and thereafter described in detail below. You find our contact details at the top of this Privacy Notice.

- Right to be forgotten
- Right to withdraw consent
- Right to access
- Right to rectification
- Right to restriction of processing
- Right to data portability
- Right to object
- Right to lodge a complaint with a supervisory authority

**Right to be forgotten**

You have the right to request that we delete any personal data that we process about you. We will delete the data as soon as possible, but at least within one month's time. If the personal data is needed for fulfilment of our contractual duties towards you or to preserve it with legal ground, we will however not delete the information until the data is no longer needed. We will also, without your explicit demand, delete such personal data that we have collected but do not longer have a lawful right to process. We will inform you about this, if it would occur.

**Right to withdraw consent**

You have the right to withdraw your given consent at any time. If you do so, we will erase such personal data which is not subject to any other legal ground than your given consent. The erasure will be done as soon as possible. Please note that your withdrawal of consent does not oblige us to erase personal data which is processed based on a contractual relationship or any other legal ground.

**Right of access**

You have, at any time, the right to receive confirmation from us as to whether personal data concerning you are being processed. You have also the right to access that personal data and to receive the following information:

- a) The purposes of the processing
- b) The categories of personal data concerned
- c) The recipients or categories of recipients to whom personal data have been or will be disclosed
- d) The envisaged period for which the personal data will be stored or the criteria used to determine that period
- e) The existence of automated decision-making and profiling

**Right to rectification**

You have, at any time, the right to demand us to correct any inaccurate personal data within a month's time. You have also the right to complete incomplete personal data, taking into account our purposes of the processing, by the means of providing a supplementary statement.

**Right to restriction of processing**

You have, instead of demanding us to delete any data, the right to demand us to restrict our processing of your personal data. This may be achieved if

- a) You have reason to believe that the accuracy of the personal data is not correct, and the restriction shall be in place during a period that allows us to verify the accuracy of the personal data
- b) The processing is unlawful but you don't want us to delete the personal data
- c) We no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims
- d) You have objected to processing concerning profiling or automated decision-making, whereby a restriction shall be obtained during the period when we assess whether our legitimate ground for the processing override your legitimate ground.

**Data portability**

You have the right to retrieve the personal data which we process about you and that you have provided to us. You have also the right to demand that we transmit such personal data to another data controller if the personal data is collected based on your consent or if the processing of the personal data is carried out by automated means by us, if we deem it technically feasible.

**Right to object**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. This can be done when the personal data is processed as part of automated decision-making, including profiling, and direct marketing, if such processing would be carried out (see "Personal data that we process" above).

**Right to lodge a complaint with a supervisory authority**

You have, at any time, the right to lodge a complaint with a supervisory authority regarding our processing of your personal data. Regardless of where we carry out our business, even if it would not be in the member state which is your country of residence, you have the right to lodge your complaint to your national supervisory authority. Please follow to the link below to find the contact details to your national supervisory authority:

[http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)

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**About this Privacy Notice**

With regard to the General Data Protection Regulation (EU) 2016/679 (“GDPR”), we must disclose what personal data we collect and process about you, and for what purposes. In this Privacy Notice, you find all such information that we are obliged to inform you.

The Regulation in its entirety in your language, may be accessed by following this link:

[http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L\\_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC](http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.119.01.0001.01.ENG&toc=OJ:L:2016:119:TOC)

**Would you like to defend your rights, which are listed in this Privacy Notice, you may contact us using the contact information listed above.**