

## UK General Data Protection Regulation (UK GDPR) Notice

By the very nature of Be Travel Wise Ltd's ("BTW") business model, the protection of personal information is a high priority. We have always sought to ensure that the rights of our clients and their people are respected and safeguarded in order to protect their privacy.

Be Travel Wise Ltd has devoted significant 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 comply with legal requirements.

BTW does not process any *special category* personal data under UK GDPR (such as biometric data, medical information, political or religious beliefs). However, we do hold certain personal and operational information necessary to run our business and deliver services, and we protect this information through robust security controls.

BTW recognises the passing of the UK 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 engaged an independent consultant to review how we operate our processes, systems, and data-gathering activities in alignment with the UK GDPR, the Data Protection Act 2018, and—where applicable—EU GDPR requirements for clients located in the EU. BTW is well positioned to fully comply with the General Data Protection Regulations.

## WEBSITE PRIVACY NOTICE (UK GDPR COMPLIANT)

### 1. Introduction

This Privacy Notice explains how we collect, use, store, and protect your personal data when you use our website or services.

BTW is committed to complying with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

We process personal data lawfully, fairly, and transparently, and only for legitimate purposes.

### 2. Who We Are

#### Be Travel Wise Ltd

Registered in the United Kingdom

Registered address: Freedman House, 117 High Street, Croydon, CR0 1QG 3RW, United Kingdom.

Email: [hello@betravelwise.com](mailto:hello@betravelwise.com)

Telephone: +44 (0)1672 500757

**Data Protection Officer (DPO):** Andy Prior

Email: [andy@betravelwise.com](mailto:andy@betravelwise.com)

Key personnel responsible for UK GDPR awareness and oversight:

**Andy Prior & Saul Shanagher**

### 3. Personal Data We Collect

We may collect and process the following categories of personal data:

#### 3.1 Information you provide directly

- Name
- Email address
- Contact details
- Business information
- Enquiries or messages sent through our contact forms

BTW does **not** store personal data locally; data is hosted with trusted third-party cloud providers.

### 4. How We Use Your Personal Data

We use your data for the following purposes:

- Responding to enquiries
- Providing services you request
- Managing client relationships
- Sending administrative or marketing communications (with consent where required)
- Improving website performance
- Meeting legal obligations
- Securing our website and systems

We do **not** sell personal data.

## 5. Lawful Bases for Processing

We process personal data using one or more lawful bases:

- **Consent**
- **Contract** (providing services you request)
- **Legal obligation**
- **Legitimate interests** (business operations, improving services, security)

Where we rely on legitimate interests, we balance them against your rights and expectations.

## 6. Data Retention

We retain personal data only as long as necessary for:

- Providing services
- Business and operational needs
- Legal or regulatory purposes

Once no longer required, data is securely deleted.

## 7. International Transfers

If your data is transferred outside the UK, BTW ensures appropriate safeguards, including:

- ICO-approved **International Data Transfer Addendum (IDTA)**
- **Standard Contractual Clauses (SCCs)**
- Government-approved adequacy decisions

## 8. Your Rights

You have the following rights under UK GDPR:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Right to withdraw consent at any time

To exercise these rights, contact: [hello@betravelwise.com](mailto:hello@betravelwise.com)

Requests are handled by the appropriate BTW team member, with oversight from the DPO, Andy Prior.

## 9. Complaints

If you are unhappy with how we handle your data, please contact us first.

You also have the right to complain to:

**Information Commissioner's Office (ICO)**

www.ico.org.uk  
0303 123 1113

**10. Security of Your Data**

We use appropriate technical and organisational measures including:

- Secure cloud storage
- Access controls
- Staff training
- Encryption where appropriate
- Regular system reviews
- Incident detection and reporting processes

Our third-party cloud providers notify us promptly of any suspected data breach.

**11. External Links**

Our website may contain links to third-party websites.  
We are not responsible for their privacy practices or content.

**12. Children's Privacy**

We do not knowingly collect data from individuals under the age of 16.  
If such data is discovered, it will be deleted.

**13. Changes to This Privacy Notice**

We may update this notice periodically.  
The latest version will always be available on our website.

**14. Additional Information for EU Visitors (If Applicable)**

If BTW provides services to individuals located in the EU, their rights under EU GDPR are also recognised. The same procedures for access, deletion, and correction apply.

**15. Additional Information for U.S. Residents (Optional)**

If BTW receives data from U.S. residents, we comply with relevant U.S. state privacy laws where applicable, including:

- California CCPA/CPRA
- Virginia VCDPA
- Colorado CPA
- Connecticut CTDPA
- Utah UCPA

Subject to these laws, U.S. residents may have the right to:

- Access
- Delete
- Correct

- Know categories of data collected
- Opt out of data selling/sharing (we do **not** sell data)

Requests may be submitted to: [hello@betravelwise.com](mailto:hello@betravelwise.com)