



ESSENTIAL
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Privacy Policy

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1) Introduction

The Proprietor and Owner of Ambassadeurs Commerce Limited (“AC”) is Ambassadeurs Commerce Limited (“AC”, “we”, “our” or “us”). If you are or become a client of Ambassadeurs Commerce Limited, you will be subject to our contractual terms (the “Terms”). Our registered address is 5a Hamilton Place, London, United Kingdom, W1J 7EY, and our Registration No. 11789608.

We want our clients (“you”) to know that we value your privacy and Personal Data just as much as you do. We apply the highest standards to ensure your Personal Data is secure, and we always comply with Data Protection Legislation (“Data Protection Laws”).

The services we offer are regulated by the Civil Aviation Authority (“CAA”).

AC is a Data Controller registered with the **Information Commissioner’s Office**, Registration No. ZA782734.

In this privacy policy (the “policy”), we not only want to advise you of your rights, but also explain how we respect them. Any personal data you provide to us, through you accessing our website, making a travel enquiry with us, or a travel booking is subject to the terms of this policy. This policy and AC collection, processing, use or disclosure of personal data shall be governed by and construed in accordance with English law.

Personal Data is any information relating to you from which:

- you can be identified from the information in question; or
- you can be indirectly identified from that information in combination with other information.

Sensitive Data includes information concerning:

Racial or ethnic origin, Political opinions, Religious and philosophical beliefs, Trade union membership, Genetic data, Biometric data, Data concerning health, Sex life and sexual orientation.

Apart from the Sensitive Data referred to within the “Data Category Table” below, we do not collect any other Sensitive data about you (this also includes details about your, sex life, sexual orientation, political opinions, trade union membership and information about your genetic data)

2) Cookies

Our website requires the use of files containing small amounts of data that exchange between your computer’s browser and our web server. They are known as “cookies” and are used for a number of functions such as remembering who you are and your choices, either for that session or for when you return to our website. Some cookies are required for our website to work but only last as long as your visit. As a result, you cannot opt out of those. All of the other cookies we like to use you can control, though some functionality may be limited by your choice. You can change your cookie preferences at any time.

3) Categories of personal data

The table below sets out the categories of data we use, what they can include, and the period for which we retain that data (from the date of the last relevant activity). Some sections may include categories from another section, particularly your contacts details and identifiers.

Below listed are the maximum retention periods but where it is appropriate, we may apply lesser retention periods.

Category	Why do we collect it?	Data Included	Retention period
Client personal and contact information	To be able to fulfil your requested services. To communicate with you about your booking.	Name; residential address; date of birth; identity documentation; gender; nationality; biometric data; email contact; telephone contact; preferences; interactions with us (including emails and phone calls).	6 years.
Passport Information	To complete the required Advance Passenger Information or Electronic Travel Authorisations. To obtain VISA`s To obtain Boarding passes To secure Accommodation	Name; date of birth; identity documentation type; document reference number, document image; gender; nationality; biometric data.	6 years.
Health / Medical Information (Sensitive Data)	So that suppliers can provide assistance / provide special arrangements. To be able to arrange assistance in a medical or other emergency. So that travel insurers can provide cover.	Basic Health & Medical information (e.g. allergies).	6 years.
Mailing List (Ad-hoc information about, for example, interests, special occasions, special requests.)	To arrange or provide services tailored to your requirements. To communicate in a relevant way.	Name, postal address, email address, telephone number, age, gender, occupation, email contact; telephone contact; lifestyle and social circumstances; preferences.	6 years.
Current and Historic Information (bookings)	To arrange or provide services tailored to your requirements. For purposes of accounting, reporting, analysis and regulatory disclosures. To communicate in a relevant way.	Travel data and geographical location.	6 years.
Finance and Payment Information	To be able to process your payment. To meet any auditing, regulatory or lawful requirement.	Name; date of birth; identity documentation (passport / visa); gender; nationality; biometric data; residential address; concessions; invoices; applications; financial transaction history; bank account details; bank card details; debt information; payment services and other details of products and services you have purchased from us.	7 years.
Marketing	To make you aware of new services, competitions and promotions including those of our partners from time to time which we feel would be useful to you. (All Marketing preferences are based on you opting in and may be managed at any time)	Name; date of birth; nationality, occupation; address; email contact; telephone contact; visits; gaming history; preferences; travel preferences; interactions with us.	2 years or deletion on request.
Complaints & issues	To assist you in relation to their travel arrangements and to handle complaints.	Name; residential address; date of birth; nationality; biometric data; email contact; telephone contact; travel and geographic movement information; preferences; interactions with us (including emails and phone calls); behaviours; complaints and issues.	6 years.
Audio recordings	Staff Development / Identifying errors and to enable the effective resolution of complaints and issues.	Telephone audio recordings.	6 years.

4) Data we may process under a legal obligation

Basis: Where we have a legal obligation to collect and process specific personal data as a condition of our services offered under the CAA.

Type of Data: Client; finance; complaints & issues; audio recordings.

When Data is Processed: We may collect and process this Personal Data in circumstances including, but not limited to, the following:

- If we believe the release of information about you or your business is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule or regulation. This includes exchanging information with other entities or fraud protection and credit risk reduction.
- If we believe that in order to safeguard you and others, and in assisting insurers, agents and or medical staff, we may exchange personal data and sensitive categories of personal data where we/they need to act on your behalf or in the interest of other customers or in an emergency.

Your Rights: As we are under a legal duty to process this data, some of your rights may not apply.

5) Data we may process under our contract with you

Basis: When you become a Client, you enter into a contract with us. This contract includes the Terms of services and you must agree to our privacy policy. We would only use your personal data to provide our services to you; including to maintain our accounts, records and to provide customer services.

Type of Data: Client; finance; complaints & issues; audio recordings.

When Data is Processed: We may collect and process this data:

- When you apply for services, use our services, or when you update your personal details or ID documents with us;
- When we verify your identity, financial and personal details.
- When you contact us, request services, report a problem, or wish to make a complaint.
- When there is a requirement to disclose information, only relevant information about you to uphold our contractual obligations to you as a customer in fulfilling your travel arrangements. This may include disclosing relevant personal information with third party businesses and organisations, including airlines, tour operators, travel ancillary providers, banking organisations, and public authorities such as customs/immigration.

Your Rights: While you may request that your personal data be removed from our live systems (which will also suspend or terminate your account) we may nonetheless retain a separate secure copy in order to deal with any complaints or contractual issues in line with our retention periods.

6) Data we may process with your specific consent

Basis: When you become a Client or during the application of services, we will ask your **express permission** to contact you in relation to some of our additional services, events, general updates about us or other marketing materials (“Marketing Communications”). You do not have to give your consent, and we will not contact you with Marketing Communications unless you do so.

Type of Data: Mailing list and Marketing

When Data is Processed: We may collect and process this data:

- If you give us your express permission to do so when you either apply for services, become a client or you ask us to update your marketing preferences.

Your Rights: You are entitled to qualify, vary or **withdraw your consent** in relation to **marketing** whenever you want to. You can do so either via your online account details or by contacting us direct.

7) Data we may process where we have a legitimate interest

Basis: We process specific data in order to protect the **legitimate interests** of AC, our employees, and our clients. This includes securing our premises, our online portal, applying anti-fraud measures, investigating suspicious transactions and behaviour, conducting and managing our business and maintaining appropriate records.

Type of Data: **Client; complaints & issues; finance; audio recordings.**

When Data is Processed: This data is used:

- Upon the application of and use of our services, throughout the premise and online portal to enable the effective safeguarding of both yours and our assets and information.
- If you telephone us, calls may be recorded for safeguarding, training, quality purposes and the resolution of complaints and issues.

Your Rights: Whilst you are entitled to correct incorrect personal data, if you do not agree to this processing then this may result in services being refused.

8) Where your personal data may be stored and transferred

The information that you provide to us will be held in our systems, which are located on our premises or those of an appointed third party. We are based in the United Kingdom and your information will be accessed and used here and elsewhere in the European Economic Area (EEA) where we enable the provision of the contracted services.

While countries within the EEA all ensure a high standard of data protection law, some parts of the world may not provide the same level of legal protection of your personal data. In each case, your data may, for purposes described in this notice or otherwise approved by you, be transferred to, processed by and stored by persons operating outside of the EEA and the third party may require access to all or some of your data. For example:

- our staff, suppliers or agents located outside of the EEA may need to access and process personal data to fulfil requested and or contracted services or provide other support services;
- we may use cloud-based technology hosted outside of the EEA to host some of our applications; and
- we may use service providers based outside of the EEA to help us support some of our information technology infrastructure and these service providers may need to access your personal data in order to provide and support that infrastructure.

When we send personal data outside of the EEA we take steps to put in place appropriate safeguards to

protect the information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed in accordance with applicable data protection laws. We protect your personal data, for example, by:

- transferring to a jurisdiction which the European Commission recognises as providing adequate protection for the rights and freedoms of data subjects in connection with the processing of their personal data;
- where possible, putting in place standard contractual clauses (SCC`s) in accordance with European Commission decisions on transferring personal data).
- ensuring access controls which limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know; and
- ensuring they will only process your personal information on our instructions, for the reasons we specify.

We may also from time to time rely on one or more of the ‘derogations’ available in applicable data protection laws, for example:

- The transfer is necessary for the establishment, exercise or defence of legal claims; or
- We have the individual’s explicit consent;
- The transfer is necessary for the conclusion or performance of a contract in the interest of the individual concerned, and we are party to that contract; or
- The transfer is necessary in order to perform a contract between us and the individual concerned, or the implementation of pre-contractual measures taken at the individual’s request.

We may also be compelled by law to disclose your personal data to a third party and will have limited control over how it is protected by that party in such circumstances.

9) Access to your personal data

Where you exercise your rights to data access under Data Protection Law, to request a copy of your personal data held by us, we will supply you with all the personal data to which you are entitled, promptly and normally no later than one month after the receipt of your Data Subject Access Request. In rare cases, where the requests are complex or contain multiple requests, the period of compliance may be extended by a further two months, but we will write to you and explain why any extension is required within one month of your request.

Any access request is normally free, although in some cases we may charge a reasonable fee based purely on our administrative costs when a request is clearly unfounded, is made excessively, or is made repetitively.

You may also have the right to Data Portability which allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without affecting its usability. If you wish to exercise this right, we will transmit such data to you in a machine-readable code where it is technically feasible to do so

10) How long do we keep your personal data?

Generally, we comply with the retention periods specified above though there may be exceptions, such as where there is an ongoing enquiry. Your personal data may also be subject to increasing internal restrictions on accessing. For example, personal data may be removed from front office functions and only accessible by senior management with specific reasons.

11) Who do we disclose your personal data to?

Aside from our legal and contractual obligations to share your personal data to various agencies as required by law, we may also share some of your information with the following categories of third parties:

- any trading brand within Ambassadeurs Commerce Limited and our sister companies (“other companies with close affiliations to us, owned by the same ultimate parent company and their respective subsidiaries and or trading brands for the purposes set out in this notice (for example, information and customer relationship management; software and service compatibility and improvements; and to provide you with any information, applications or services that you have requested);
- authorised representatives or agents acting on our behalf with respect to the promotion of our services in particular territories.
- suppliers where necessary, in performance of services which you have contracted, with or through us (which may include sharing data in order to perform and process payments associated with performance of such services);
- information technology companies undertaking services for us in connection with maintenance, support, development or enhancement of our websites or our other information technology platforms and infrastructure;
- third parties that we engage to perform market surveys/client feedback surveys, subject to your selected preferences;
- third parties which we engage to securely host communication services (emails and SMS) and act as suppliers to distribute our notifications and other marketing communications on our behalf, both where you have requested information and where we believe that information will be of interest to you;
- companies used to facilitate payment transactions arising from engagement of our services;
- credit reference agencies for the purposes of supporting mechanisms which assist us in safer gambling and affordability assessments;
- fraud prevention agencies;
- recruitment agencies or website recruitment platforms in the context employment;
- law enforcement agencies, regulators or other applicable third parties, where necessary to enable us to comply with our regulatory and legal obligations (including statutory or regulatory reporting or the detection or prevention of unlawful acts), or where necessary to assist them in the conduct of their investigations;
- authorised third parties engaged to support us in performing customer and enhanced customer

due diligence checks;

- our clients (if you are a supplier), in the course of performing any engagement for services;
- relevant third parties in the context of actual or potential legal proceedings (for example in response to a court order, enforcement of the terms of a contract and debt recovery);
- our own professional advisors and auditors for the purpose of seeking professional advice or to meet our legal, regulatory and auditing responsibilities; and
- another organisation if we sell or buy (or negotiate to sell or buy) any of our companies, business or assets.

We may compile statistics about the use of our websites including data on traffic, usage patterns, user numbers, and other information. All such data will be anonymised and will not include any data which can be used to identify you either by itself or when combined with other data. We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties, but this will not include information that can be used to identify you.

We do not sell personal data to third parties for marketing purposes.

Your Rights: You have the right to object to this and to correct any incorrect data. Services may be conditional on allowing us to share this personal data.

12) Changes to this policy

From time to time we will need to update, change or supplement this Policy, including by altering the types of personal data that may be collected, processed or shared. If this happens, we will update this Policy on our website, in our literature, and we will contact you (normally by email) to inform of any updates to this Policy before such changes come into effect. If you do not agree to these changes, then you will have to inform us.

13) Your rights

You have the following rights (“Data Rights”):

- The right to be informed: This privacy policy is intended to meet our obligation to provide “fair processing information”.
- The right of access: You have the right at any time to ask to see a copy of the personal data we hold about you.
- The right to withdraw consent: Where you have given your consent to our processing you may withdraw this at any time.
- The right to rectification and data quality: If your personal data is incorrect or incomplete then you may ask us to remedy that.
- The right to erasure including retention and disposal: You may ask us to delete or remove your personal data where there is no compelling reason for its continued processing, but this may affect any services we provide to you which relies on that personal data.

- The right to restrict processing: Where you have highlighted an issue with the data.
- The right to data portability: This allows you to request that your personal data be shared with other processors at your request.
- The right to object: Where you have an objection to our processing you may do so.

You may also have the right to lodge a complaint with the Information Commissioner's Office if you believe we are in breach of our legal obligations under data protection laws.

14) Contact us

If you wish to exercise any of your Data Rights, if you have any questions, complaints, or comments regarding this Policy, please contact us:

- by post to: The Data Protection Officer (DPO), 5a Hamilton Place, London, United Kingdom, W1J 7EY.
- by email to: The Data Protection Officer (DPO) at DPO@Ambassadeurs.com.

To further query your rights regarding your personal data, to lodge a complaint, raise a concern about how your complaint has been handled and / or appeal against any decision made following your complaint, in accordance with your rights, you may contact the **Information Commissioner's Office** (ICO): <https://ico.org.uk/>.