

## Personal Data and Business Travellers

This note supplements our Privacy Policy and highlights how we deal with personal data of Business Travellers. You should also review our Privacy Policy (available at <https://www.travelcounsellors.co.uk/gb/leisure/privacy-policy-data-security/>). It sets out more detail on your rights and how we deal with personal data.

*An explanation of terminology: "Business Travellers" are those on Business Travel bookings where "Business Travel" means travel arrangements under a Business Travel Account. We typically book Business Travel as agent for the relevant suppliers. A "Business Account Holder" is a business that has a general business travel arrangement with us ("Business Travel Account") and may be, for example, your employer or another business that allows you to make bookings under their Business Travel Account.*

**We are Travel Counsellors Limited** and we are the **controllers** of your personal data which we process in accordance with our Privacy Policy. This means that we are responsible for the data which we process under data protection law. If you have any questions about how we process your personal data please contact us at [DPO@travelcounsellors.com](mailto:DPO@travelcounsellors.com)

### How do we collect personal data?

We collect personal data from actual and potential travellers for Business Travel ("Traveller Data") via Business Account Holders (and others appointed to act on their behalf such as event planners) and from Business Travellers so that we can provide the services we have agreed to provide in our contract with the Business Account Holder and to fulfil any booking, travel or preference requests.

### What Traveller Data do we collect?

We collect a range of information depending on the Business Travel requirements including name, contact details, gender, date of birth, passport and visa details, and next of kin information.

### What do we use the Traveller Data for?

We primarily use Traveller Data to facilitate and arrange the Business Travel and generally perform the ancillary services we are contracted to provide (such as being able to provide traveller whereabouts and incident support). It is necessary for us to collect and use the Traveller Data, and provide it to relevant suppliers, to perform our contract with the Business Account Holder, to fulfil your requests and book the Business Travel.

We may also process your personal data to detect and prevent fraud and crime; improve our systems, services and products; deliver personalised marketing; measure the success of our business and marketing; and to deal with questions or complaints related to your Business Travel.

There can be many elements to the services we provided to a Business Account Holder such as travel and accommodation bookings, travel and cost reporting to the Business Account Holder, administration of the account, and meeting and event planning such as catering and access requirements.

Typically, we create a Passenger Name Record (PNR) from the Traveller Data we have received and use this to make bookings in the systems of third-party providers such as airlines. Sometimes, information is also required to be supplied to airlines and other travel providers for them to comply with their legal and regulatory requirements such as advance passenger information requirements in certain countries (APIS). Some arrangements will have less structured data requirements, e.g. bespoke events may require different types of information than a standard airline booking.

Once we provide the Traveller Data to third party suppliers, they will typically become the controllers of that Traveller Data and may have their own legal and contractual obligations in respect of that personal data. You should visit supplier websites or contact them directly if you wish to find out more and/or understand any data rights you have with them.

Where suppliers are not controllers of the personal data we provide to them but instead they process that data on our behalf, then we take steps to safeguard your data in accordance with applicable data protection laws.

*Travellers should be aware that certain supplier systems may allow business travellers on the same booking to see the personal data of other travellers on the same booking. Where we know about this potential situation, we try to use our systems and supplier systems in a way to avoid it but this may not always be possible in order to complete the required bookings. For example, we may need to combine travellers on a booking to ensure seats are secured at times of low or rapidly decreasing availability or to allow all travellers to leverage priority booking or baggage rights available to one of the travellers.*

Not every third-party supplier will operate the same standards of data protection as you might expect in the UK and/or EEA, but Business Travel will not be possible without the transfer and you should be aware of this when you provide us with your information and itineraries. Also, some suppliers will be based in locations where data protection laws are not as strong as in the UK and/or EEA but, again, without the transfer Business Travel will not be possible. We endeavour to ensure that any Traveller Data we transfer is dealt with responsibly and suitably protected but we provide the travel arrangements you request and are not, and cannot be, responsible for any supplier that you require.

### Your Data Protection Rights

As a data subject you have various rights under data protection law which apply in different circumstances. Some of these rights may only apply to certain data and may be limited for example where exemptions apply.

You have a right to:

- object to some of our data processing on grounds relating to your particular situation;
- obtain information about how we process your personal data and to obtain a copy of it;
- rectify inaccurate data;
- withdraw consent to data processing where we rely on your consent;
- request that we restrict our processing of your data;
- request that we erase your personal data;
- request that we provide you with your personal data in a structured, commonly used and machine-readable format or that we transmit those data to another controller; and
- make complaints to the Information Commissioner.

A more detailed explanation of these rights and when they apply can be found in our <https://www.travelcounsellors.co.uk/gb/leisure/privacy-policy-data-security/>. You can also contact us at [DPO@travelcounsellors.com](mailto:DPO@travelcounsellors.com) for more information or if you wish to exercise your data protection rights.