

TOTAL MANAGEMENT GROUP UK LIMITED – PRIVACY NOTICE

1. ABOUT US

Total Management are committed to protecting and respecting your privacy, whilst offering the best service and experience. We follow strict security procedures on the holding and usage of personal information. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects to you.

2. PURPOSE OF PRIVACY NOTICE

This privacy notice aims to give you information on how Total Management collects and processes your personal data through your use of this website or our services, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition. This website is not intended for children.

It is important that you read this privacy so that you are fully aware of how and why we are using your data.

3. DATA PROTECTION PRINCIPLES

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

4. HOW WE COLLECT YOUR DATA

We use different methods to collect data, you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when corresponding with Total Management or place a request for services with Total Management and includes circumstances in which you:

- Apply for our products or services;
- Complete booking transaction;
- Subscribe to our service or publications;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey; or
- Give us some feedback.
- Apply for a job

Use of Cookies

We use cookies and other similar technologies to distinguish you from other users of our website. This helps us to provide you with a better experience when you use the website and allows us to improve it. A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or mobile device. For example, cookies can be

used to collect information about your use of the website during your current session and over time (including the webpages you view and the files you download), your operating system and browser type, your internet service provider, your domain name and IP address, the website that you visited before our website, and the link that you use to leave our website. If you are concerned about having cookies on your computer, you can set your browser to refuse all cookies or to indicate when a cookie is being set, allowing you to decide whether to accept it. You can also delete cookies from your computer. However, if you choose to block or delete cookies, certain features of the website may not operate correctly. For more information see www.allaboutcookies.org. We use Google Analytics to help collect and analyse certain information about you (such as age, gender and interests). This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Third parties or publicly available sources

We may receive personal data about you from various third parties and public sources as set out below:

- Technical Data from analytics providers such as Google based outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

5. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, passport details, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences
- **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 and other relevant transactional information
- **Technical and Usage Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to interact with or access information and how you use our website, products and services.

We may collect any Special Categories of Personal Data about you (such as dietary requirements and medical conditions if required for the purpose of the services as well as information such as your religion if for example you specify a meal preference that indicates a particular religion. We do not collect any information about criminal convictions and offences.

6. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal, business or regulatory obligation.
- When you consent to it

We do not rely upon consent as a legal basis for processing personal data other than in relation to sending third party direct marketing communications to you via email or other means. We have set out below the ways in which we use your data however please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

- To manage your booking
- To contact you with information and detail about your booking
- To personalize your customer experience
- To improve our service
- To send you marketing material
- To ensure security and protect business interests
- To process job applications
- To use data analytics
- To comply with legal obligations

Marketing Material and Practice

We sometimes collect your information so that we can form a view on what we think you may want or need, or what may be of interest to you. With this information we decide which products, services and offers may be relevant for you and what marketing you may be interested in.

We keep you up to date with our latest offers, partnerships, sales, promotions, competitions that we think might be of interest/relevance to you. We will only contact you in this way if:

- You have signed up to receive marketing communications from us and have not later told us that you don't want to hear from us.
- You have requested information from us or entered a competition or registered for a promotion and provided your details and you have not told us that you do not want to hear from us.
- You have made a booking with us and have not told us that you do not want to hear from us. You may opt-out from receiving marketing material from us at any time by either clicking the unsubscribe option in our emails, or by contacting info@total-management.com

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 we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

7. SHARING YOUR PERSONAL DATA AND THIRD PARTIES

We require all third parties to respect the security of your personal data and to treat it in accordance with Privacy Law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions. We may have to share your personal data with the parties set out below:

- Third part suppliers we work with to provide your booking and other services i.e airlines, tour operators, transport companies, excursion providers, airport authorities, insurance companies, car hire, event venues
- Other suppliers we work with in connection with our business. This might include marketing agencies, IT developers, services providers, software companies and credit card screening companies.
- Credit references and fraud prevention agencies
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- 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 to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We share your personal data within Total Management Group. This will involve transferring your data outside the European Economic Area (EEA). Many of our external third parties 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 carried out and that those countries have been deemed to provide an adequate level of protection for personal data by the European Commission.

8. SECURING YOUR DATA

We have security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors and other third parties who require information for the purpose of a transaction or service on your behalf. Your personal data will remain confidential and only be used on our authority.

We have set out procedures to combat suspected personal data breach and will notify you of any applicable breach where we are legally required to do so.

9. HOLDING YOUR DATA

We will only retain your personal data for as long as necessary to fulfil the purposes of use, including; legal, accounting, or reporting requirements.

For the purpose of Tax and accounting we are required by law to retain information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after the final transaction. In some circumstances you can ask us to delete your data:

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

- **Access:** We will confirm to you whether or not we are processing and using personal information about you, at your request and, if so, provide you with access to and a copy of such personal information and the other details to which you are entitled.
- **Rectification:** We will correct any inaccurate personal data and complete any incomplete personal data (including by providing a supplementary statement) that we hold about you.
- **Prevention of processing likely to cause damage or distress:** We will respect your rights to require us to cease or not to begin processing your personal information for a specific purpose, or in a specific way, that is likely to cause you or any third parties unwarranted damage or distress.
- **Erasure:** We will erase your personal information at your request without undue delay where there is no good reason for us to continue to use it.
- **Restriction:** We will restrict the processing of your personal information in certain circumstances, if you ask us to do so.
- **Data portability:** We will provide you or third parties on your behalf with a copy of any personal information that we hold about you which you have provided to us in a structured format
- **Objections:** We will respect your general rights to object to the processing of your personal information in certain circumstances, including opting out of direct marketing.
If you wish to exercise any of the rights set out above, please contact us.

Applicable fees

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). 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 implement security measures to confirm your identity when requesting data, and may ask for specific information before we are able to release personal data.

11. PROVIDING YOUR PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

12. INFORM US OF DATA CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us

13. CONTACTING US

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the below information.

Contact details

Total Management UK Ltd

Email address: dataprotection@total-management.com

Postal address: – The Matrix Studio 91 Peterborough Road

Telephone number: – 02073846308

We try to respond to all legitimate requests within one month. 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.

For more information go to: <https://totalmanagement-travel.com/privacy-policy-2/>