

Journee: Privacy Policy

1. Introduction

This website is provided by **Journee Ltd** (henceforth referred to as “we” / “us” / “our” / or “Journee”).

The security of your personal information is important to us. This Privacy Policy is designed to help you feel more confident about the privacy and security of your personal information when using our website or accessing any of our travel booking and itinerary planning services (“Service”).

This Privacy Policy (together with our Terms & Conditions) sets out the basis on which we process any personal information we collect from you, or that you provide to us through the Service.

For the purpose of this Privacy Policy, we are the controller of the personal information we process and our contact details are set out in the contact section at the end of this Privacy Policy.

2. Age requirements

We do not knowingly collect personal information from children under 16 years of age. If you are under 16 years old, please do not provide any personal information to us.

3. Information we may collect from you

3.1. We may collect and process the following information about you:

- 3.1.1.** information that you provide to us, for example, when:
 - 3.1.1.1.** submitting enquiries (e.g. by submitting a Trip Matchmaker form) or requesting information from us;
 - 3.1.1.2.** making a booking with us (e.g. by submitting a Booking Details form);
 - 3.1.1.3.** entering one of our competitions, promotions or surveys;
 - 3.1.1.4.** if you report a problem with our Service;
- 3.1.2.** information that you authorise a third party (e.g. a social media network) to share with us, such as your email address or other information that may identify you;
- 3.1.3.** information you provide to us for the purpose of subscribing to direct marketing;
- 3.1.4.** information provided if you apply for a job with us;
- 3.1.5.** information provided in, or relating to, any other communications you have with us; and
- 3.1.6.** statistical data about your browsing actions and patterns, which does not identify you. This means information about your computer and your use of our Service,

including (where available) your IP address, unique mobile device identifier (**UDID**), International Mobile Equipment ID (**IMEI**), Android ID, device MAC address, browser information, operating system, timestamps, the pages that you request, applications downloaded, traffic data, location data, weblogs and other communication data, and the resources that you access.

- 3.2.** It is important that the personal information we hold about you is accurate and current. Please keep us informed if, at any time, your personal information changes.

4. How we use your information

We use information held about you in the following ways:

- 4.1.** to provide our Service to you (including booking travel, accommodation and/or experiences on your behalf);
- 4.2.** to identify you when you use the Service;
- 4.3.** to answer your questions and improve the Service;
- 4.4.** to deal with enquiries or complaints made by or about you relating to our Service;
- 4.5.** to ensure that the Service is presented in the most effective manner for you and for your computer;
- 4.6.** to help keep our website and systems secure and prevent and report fraud or other crimes we may suspect;
- 4.7.** where relevant, to meet legal, regulatory and compliance requirements;
- 4.8.** where relevant, for the establishment, exercise or defence of legal claims;
- 4.9.** to notify you about changes to our Service; and
- 4.10.** for marketing purposes. For example, to provide you with updates, new features, news, events, special offers, promotions and competitions. Where we do so, you will be able to unsubscribe from such communications. For more information about our use of your information for marketing purposes please see section 11 below.

5. The legal basis for processing your personal information

We will only use your personal information when the law allows us to. We will use your personal information in the following circumstances:

- 5.1. where it is necessary for entering into or performing a contract** – in order to perform obligations which arise under the contract we have entered into with you (including booking

flights, accommodation or experiences on your behalf), it will be necessary for us to process your personal data;

- 5.2. where we need to comply with a legal obligation** – we are subject to certain legal requirements which may require us to process your personal data. We may also be obliged by law to disclose your personal data to a regulatory body or law enforcement agency;
- 5.3. 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** – either we, or a third party, will need to process your personal data for the purposes of our (or a third party's) legitimate interests, provided we have established that those interests are not overridden by your rights and freedoms, including your right to have your personal data protected; or
- 5.4. where you have provided consent** – in some circumstances, we may ask for your consent to process your personal data in a particular way.

6. How we share your information

- 6.1.** We may share your personal information with third parties in the following circumstances:
 - 6.1.1.** to book elements of your trip with third-party suppliers (e.g. airlines, hotels, tour operators, etc.);
 - 6.1.2.** for marketing purposes where you consent to this;
 - 6.1.3.** to protect the rights, property or safety of us or other Service users;
 - 6.1.4.** where we are obliged, or permitted, to do so by applicable law, regulation or legal process; or
 - 6.1.5.** if we (or substantially all of our assets) are acquired by a third party, in which case personal information held by us about our users will be one of the transferred assets.
- 6.2.** We may pass aggregated information to third parties about how our users use our Service but this will not include information which could be used to identify you.
- 6.3.** The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (**EEA**). It may also be processed by persons operating outside the EEA who work for us or a third party supplier engaged by us in order for us to provide the Service to you. Where we share your personal information with companies located outside of the EEA we will ensure that your data is processed in accordance with the GDPR and any other relevant data protection legislation and that adequate safeguards have been put in place.

- 6.4.** Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our Service and any transmission is at your own risk.

7. Where we store your information

- 7.1.** We take appropriate organisational and technical measures to protect your personal information that we hold and to ensure that your personal data is treated in accordance with this Privacy Policy. We limit access to your personal information to those who we believe reasonably need to come into contact with that information in order to carry out their jobs. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 7.2.** We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Cookies

- 8.1.** We use cookies and similar technologies to provide and optimise our Service. You can control which cookies you get and which you keep on your device through your browser settings. Unless you have adjusted your browser settings so that it will refuse our cookies, our system will issue cookies when you visit our website. However, if you do not accept cookies some parts of our Service may become inaccessible or not function properly and you may not be able to take advantage of various special features of the Service.
- 8.2.** We use cookies to keep track of the pages you and other visitors have been to on our Service. We may also use cookies to serve advertisements which we believe are most likely to be of interest to you.
- 8.3.** All of the major browsers offer tips and guidance for managing the cookies available on your browser. There are also lots of different third party browser plug-ins and extensions available which you can download to make it easier to see and control your cookies.
- 8.4.** You can find out more about internet advertising by visiting the following websites: www.allaboutcookies.org, www.yourchoicesonline.eu and www.networkadvertising.org. Some of these sites enable you to opt out of online behavioural advertising and other tracking cookies (in addition to the control settings on your browser).

9. Links

Our Service may contain links to and from other websites and services. We are not responsible for the privacy practices or the content of any third party sites. Please check the individual privacy policy of any such websites or services before you submit any personal information to them.

10. Advertisers

We may from time to time use third party advertisers or sponsors on our Service. In the event that we do so we will not disclose identifiable information about individuals but we may provide them with aggregated information about our users. We may also use such aggregated information to help advertisers reach the kind of audience they want to target (e.g. women in London). We may make use of the personal information we have collected from you to enable us to comply with our advertisers' and sponsors' wishes by displaying their advertisement to that target audience.

11. Marketing

- 11.1. We may send you information about other products and services that may be of interest to you where:
 - 11.1.1. you have consented to this (via the opt-in box when you register for the Service or elsewhere);
 - 11.1.2. you have purchased a product or service from us (e.g. you have booked a trip with us), unless you have opted-out of receiving such communications;
 - 11.1.3. it is in our legitimate interest to do so, for example it allows us to provide a better service to you.
- 11.2. You can manage your marketing communication preferences by emailing us at info@journeetrips.com. For example, you can request that we only send you marketing information by email.
- 11.3. You have the right at any time to ask us not to process your personal information for marketing purposes. You can exercise your right to opt out of such processing by checking certain boxes on the forms or registration pages that we use to collect your information, clicking "unsubscribe" links on email communications that we send you or by contacting us by post or using the contact details set out below.
- 11.4. Please note that even if you ask not to receive marketing communications, we may still need to send you service messages regarding your use of the Service, particularly if you have an upcoming trip.

12. Rights that you have

- 12.1. You have certain rights in relation to personal information we hold about you. Details of these rights and how to exercise them are set out below. We will require evidence of your identity before we are able to act on your request.
 - 12.1.1. **Access** - you have the right at any time to ask us for a copy of the personal information that we hold about you and to check that we are lawfully processing it.

- 12.1.2. Right of correction or completion** - if information we hold about you is incomplete, inaccurate or outdated you have a right to have the data amended or completed. Please contact us using the details below if you believe this is the case.
- 12.1.3. Right of erasure** - in certain circumstances, you have the right to request that personal information we hold about you is erased. For example, if the information is no longer necessary for the purposes for which it was collected or processed or our processing of the information is based on your consent and there are no other legal grounds on which we may process the information.
- 12.1.4. Right to object to or restrict processing** - in certain circumstances, you have the right to object to our processing of your personal information by contacting us using the details below. For example, if we are processing your information on the basis of our legitimate interests and there are no compelling legitimate grounds for our processing which override your rights and interests. You also have the right to object to use of your personal information for direct marketing purposes. You may also have the right to restrict our use of your personal information, such as in circumstances where you have challenged the accuracy of the information and during the period where we are verifying its accuracy.
- 12.1.5. Right to withdraw consent** - in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. You can do this by contacting us using the details in the Contact section below. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

12.2. In order to exercise any of these rights or if you would like further information please contact us using the details below. Most of the above rights are subject to limitations and exceptions. We will provide reasons if we are unable to comply with any request.

12.3. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request.

12.4. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

13. How long we will hold your information

13.1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, or reporting requirements.

- 13.2.** To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the data, the purposes for which we process the data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 13.3.** Details of retention periods for different aspects of your personal data are available in our retention policy. Please contact us if you require further information.

14. Changes to our Privacy Policy

We occasionally modify our Privacy Policy and any changes we may make to it in the future will be posted on this page and, where appropriate, notified to you (e.g. by email).

15. Contact

- 15.1.** If you have any questions, suggestions or concerns regarding our Privacy Policy or our use of your personal information please contact us by email at info@journeetrips.com or by post to Data Protection Officer, Journee Ltd, Mainyard Studios, 35 Bow Road, London, E3 2AD.
- 15.2.** We encourage you to contact us directly in the first instance with any concerns that you may have regarding our use of your personal information. However, you also have the right to make a complaint to a data protection regulator. In the UK this is the Information Commissioner's Office. For more information, please visit their [website](#).