

# GDPR Privacy Policy

(GDPR) Article 13 of Regulation EU 2016/679

## 1. Purpose of this notice

This Privacy Notice provides mandatory information as required under Articles 13 and 14 of the European General Data Protection Regulation (GDPR) regarding the transparency of personal data processing. Definitions of certain terms within this notice are explained in the appendix.

In the UK the 2018 General Data Protection Act (DPA2018) applies to the processing of personal data. The DPA2018 Part 2 recognises and aligns to the GDPR (the UK GDPR); in this document the requirements of the GDPR will therefore be deemed to include the processing of data in the EU, EEA, and the UK unless otherwise specified.

## 2. The Data Controller for personal data

Corporation Travel, as Data Processor acting on the instructions of the Data Controller under a written contract with them, will subsequently use the personal data where necessary within the services being supplied to the Client. It is this contract which forms the 'Legal Basis' for the processing of personal data. Corporation Travel will be a Data Controller only if it collects personal data directly from a Data Subject in relation to a separate contract with them.

Corporation Travel also acts as a Data Controller for any personal data held regarding its own employees, processing data under its Contract of Employment with those Data Subjects. In both cases Corporation Travel processes personal data under Article 6.1(b) of the GDPR (performance of a contract) and Section 8 of the DPA2018.

## 3. Your Rights

As a EU or UK citizen, you have rights under the GDPR. These rights can be seen below. Corporation Travel will always fully respect your rights regarding the processing of your personal data and has provided below the details of the person to contact if you have any concerns or questions regarding how we process your data, or if you wish to exercise any rights you have under the GDPR.

## 4. Contact Details

Please address all queries in relation to this policy document to the following:

Corporation Travel  
Dudley Court South  
Waterfront Business Park  
Brierley Hill  
DY5 1XN  
United Kingdom

[info@corporationtravel.com](mailto:info@corporationtravel.com)

## 5. Data Protection Principles

Corporation Travel has adopted the following principles to govern its collection and processing of Personal Data:

- Personal Data shall be processed lawfully, fairly, and in a transparent manner.
- The Personal Data collected will only be those specifically required to fulfil contracted services. Such data may be collected directly from the Data Subject or provided to Corporation Travel via his /her employer. Such data will only be processed for that purpose.
- Personal Data shall only be retained for as long as it is required to fulfil contractual requirements, or to provide statistics to our Client Company.
- Personal Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal Data shall be accurate and, where necessary, kept up to date.
- The Data Subject has the right to request access to and rectification or erasure of their personal data, to object to or request restriction of processing concerning the data, or to the right to data portability. In each case such a request must be put in writing as in Section 3 above.
- The Data Subject has the right to make a complaint directly to a supervisory authority (Data Protection Authority) within their own country. Corporation Travel uses the EU Data Protection Authorities (DPAs) as our organization's independent recourse mechanism (IRM) for data transferred from the EU.
- Personal Data shall only be processed based on the legal basis explained in section 2 above, except where such interests are overridden by the fundamental rights and freedoms of the Data Subject which will always take precedent. If the Data Subject has provided specific additional Consent to the processing, then such consent may be withdrawn at any time (but may then result in an inability to fulfil travel requirements).
- Corporation Travel will not use personal data for any monitoring or profiling activity or process.

## 6. Transfers to Third Parties

Personal Data shall not be transferred to a country or territory outside the European Economic Area (EEA) or the UK unless the transfer is made to a country or territory recognised by the EU/UK as having an adequate level of Data Security or is made with the consent of the Data Subject, or is made to satisfy the Legitimate Interest of Corporation Travel in regard to its contractual arrangements with its clients.

All internal group transfers of Personal Data shall be subject to written agreements under the Company's Intra Group Data Transfer Agreement (IGDTA) for internal Data transfers which are based on Standard Contractual Clauses recognised by the European Data Protection Authority.

Appendix - Definitions of certain terms referred to above:

**Personal Data:**

(Article 4 of the GDPR): 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

**Processing:**

(Article 4 of the GDPR): means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, erasure or destruction.

**Legal Basis for Processing:**

(Article 6 of the GDPR): At least one of these must apply whenever personal data is processed:

1. Consent: the individual has given clear consent for the processing of their personal data for a specific purpose.
2. Contract: the processing is necessary for compliance with a contract.
3. Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).
4. Vital interests: the processing is necessary to protect someone's life.
5. Public task: the processing is necessary to perform a task in the public interest, and the task or function has a clear basis in law.
6. Legitimate interests: the processing is necessary for the legitimate interests of the Data Controller unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

**Data Controller:**

(Article 4 of the GDPR): this means the person or company that determines the purposes and the means of processing personal data.

**Data Processor:**

(Article 4 of the GDPR): means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.

**Data Subject Rights:**

(Chapter 3 of the GDPR) each Data Subject has eight rights. These are:

1. The right to be informed; This means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
2. The right of access; this is your right to see what data is held about you by a Data Controller.
3. The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.

4. The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
5. The right to restrict processing; this gives the Data Subject the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
6. The right to data portability; a Data Subject has the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.
7. The right to object; the Data Subject has the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
8. Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.