

We want you to be confident that your personal data is safe and secure and have updated this privacy policy to comply with the European Union's General Data Protection Regulations (GDPR), with effect from 25 May 2018.

The data controller is Alison Williamson, trading as Entirely Airports (referred to in this policy as "we" or "us").

Should you have any concerns about the use by us of your personal data, in the first instance please contact us at [info@entirelyairports.com](mailto:info@entirelyairports.com). In the unlikely event that we can't resolve a problem, you the right to complain to the Information Commissioner's Office in relation to our use of your information. The Information Commissioner's contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF Telephone: 0303 123 1113 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## What information do we collect?

We collect account holder Company names, address, phone number and names of authorised "bookers" where applicable (we process account holder personal data so that we can manage accounts and provide the services asked for). Additionally, we process name(s), address, phone number, email of travellers and dates/times/flight numbers of travel/ flights (to deliver the services). Where you provide us with personal details relating to any special requirements and/or details of any illnesses, disabilities or religious requirements, you consent to this information being passed onto any organisation or companies responsible for any part of your travel arrangements.

We generally settle accounts by invoicing, but we may take payment by credit or debit card – this is done through a Barclays Business Banking merchant account, on a face to face basis. We do not have access to payment card details. We do not offer "cardholder not present" transactions: no payment card details are retained by us.

Our website is for information only, we do not currently accept bookings through that channel nor do we analyse any visitor details (over and above Google Analytics).

Personal information we use is given during the booking process by telephone or email and is only that which is necessary for us to deliver the service that you seek. We will generally confirm bookings by email.

We want to make sure that the personal data we hold about you is accurate and up to date. If any of the details are incorrect, please let us know and we will amend them.

## How is my information used?

We use your information to administer your account and to deliver the transport services you ask for.

We never have and never will sell information to third parties.

We do not use your information for direct marketing, though we will contact companies and travellers by letter, email or phone/ text in respect of invoicing and travel arrangements.

We may share personal data with other organisations in the following circumstances:

- if the law or a public authority says we must share the personal data;
- if we need to share personal data to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud or detecting crime);
- to an organisation to which we sub-contract delivery of the service you seek - where we have these arrangements we will make sure that the organisation complies with data protection law; or
- to any other successors in title to our business.

## How we protect personal data

We know how important it is to protect and manage your personal data. This section sets out some of the measures we have in place. We use computer safeguards such as firewalls and data encryption, and we enforce physical access controls to our buildings and files to keep this data safe. We only authorise access to employees who need it to carry out their job responsibilities.

- We protect the security of your information while it is being transmitted by encrypting it using Secure Sockets Layer (SSL).
- We enforce physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personal data. We may occasionally ask for proof of identity before we share your personal data with you.

However, whilst we take appropriate technical and organisational measures to safeguard your personal data, please note that we cannot guarantee the security of any personal data that you transfer over the internet to us.

## How do I delete my personal data? (Right to be forgotten)

You can always send us an email at [info@entirelyairports.com](mailto:info@entirelyairports.com) and request that your data be deleted. In some circumstances you can ask for your personal information to be deleted, for example:

- Where your personal information is no longer needed for the reason why it was collected in the first place;
- Where you have removed your consent for us to use your information (where there is no other legal reason us to use it);
- Where there is no legal reason for the use of your information;
- Where deleting the information is a legal requirement;

Where your personal information has been shared with others, we'll do what we can to make sure those using your personal information comply with your request for erasure.

Please note that we can't delete your information where we are required to have it by law or it is necessary for legal claims.

## How long do we keep your information?

We retain personal data on our systems for as long as is necessary for the relevant service or for as long as an account is active. Electronic records will be deleted from our file system after 7 years unless there is (or it is probable there will be) an ongoing relationship with the account holder. We will only ever keep data as is necessary to comply with our legal obligations, resolve disputes and enforce our contractual agreements.

## Where is my data stored?

The personal data that we collect from you is stored inside the European Economic Area ("EEA"): it is currently processed by Dever Software Ltd, with our database hosted on a server supplied and managed by Hyve ( [www.hyve.co.uk](http://www.hyve.co.uk) ), the server is ISO 27001:2013 accredited and is located in the UK.

## How can I contact Entirely Airports if I have questions regarding the Privacy Policy?

You have the right at any time to ask for a copy of the information about you held by us, require us to correct any inaccuracies in your information, make a request to us to delete what personal data of yours we hold or object to receiving any marketing communications from us.

If you would like to exercise any of these rights, or have any questions regarding the use of your personal data or this Privacy Policy, please contact us: [info@entirelyairports.com](mailto:info@entirelyairports.com) / +44 (0)7825 398843/ October House, Upper Moor, Pershore, WR10 2JR