

Welcome to Peak Travels and our website at www.peaktravels.co.uk. This Privacy Policy describes our practices for collecting, using, protecting and disclosing the Personal Data we collect from you when you visit our website and use our services.

General Information

What law applies?

In principle, we will only use your Personal Data in accordance with the applicable data protection laws, in particular the UK's Data Protection Act ("DPA") and the EU's counterpart the General Data Protection Regulation ("GDPR").

What is Personal Data?

Personal Data is any information relating to personal or material circumstances that relates to an identified or identifiable individual. This includes, for example, your name, date of birth, e-mail address, postal address, or telephone number as well as online identifiers such as your IP address.

What is processing?

"Processing" means any operation or set of operations which is performed upon Personal Data, whether or not by automatic means. The term is broad and covers virtually any handling of data.

Who is responsible for data processing?

Thedata controller within the meaning of the DPA and the GDPR is Peak Travels LTD of 104 St. Andrews Way, Slough, Berkshire, United Kingdom, SL1 5LJ, ("Peak Travels", "we", "us", or "our").

If you have any questions about Cookies or about data protection at Peak Travels in general, you can reach us by email using peaktravelsltd@gmail.com, call 08008 611 786 or use our Contact Form.

What are the legal bases of processing?

In accordance with the DPA and GDPR, we have to have at least one of the following legal bases to process your Personal Data:

- *Consent* This is where we have asked you to provide explicit permission to process your data for a particular purpose.
- *Contract* This is where we process your information to fulfil a contractual arrangement we have made with you or reply to your messages, e-mails, posts, calls, etc.
- Legitimate Interests This is where we rely on our interests as a reason for processing, generally this is to provide you with the best products and service in the most secure and appropriate way. Of course, before relying on any of those legitimate interests we balance them against your interests and make sure they are compelling enough and will not cause any unwarranted harm.
- Legal Obligation This is where we have a statutory or other legal obligation to process the information, such as for archiving or the investigation of crime.

Data we collect automatically

Log data

Even if you do not log in or register on our website, but simply browse our website, data is collected and stored and processed by us. Specifically, this requires the IP address of your computer, Date and time of access, Name and URL of the accessed file, Browser used, Number of bytes transferred, Status of the page retrieval, Session ID, Referrer URL.



Hosting

To provide our website, we use the services of <u>Hostinger</u> who process all data to be processed in connection with the operation of our website on our behalf. The legal basis for the data processing is our legitimate interest in providing our website.

Content Management System

We also use the Content Management System of WordPress by <u>Automattic</u> to publish and maintain the created and edited content and texts on our website. This means that all content and texts submitted to us is transferred to WordPress. This represents a legitimate interest.

Content Delivery Network

We also use a Content Delivery Network (CDN) to distribute our online content. Our CDN is a network of regionally distributed servers operated by our technical service providers that are interconnected via the Internet. When you visit our website, your device's browser transmits information to these service providers, which is collected in corresponding server log files. The server log files are usually anonymized and then transmitted without personal reference. The server log files include in particular a) information on the browser and operating system used, b) the previously visited pages (so-called referral URL), c) the IP address of the device used, d) the name of the Internet provider, and v) the date, time of all page views including the amount of data transferred. The legal basis for the processing is our legitimate interest.

Cookies

We use so-called cookies on our website. Cookies are pieces of information that are transmitted from our web server or third-party web servers to your web browser and stored there for later retrieval. Cookies may be small files or other types of information storage. There are different types of cookies: a) Essential Cookies. Essential cookies are cookies to provide a correct and user-friendly website; and b) Non-essential Cookies. Non-essential Cookies are any cookies that do not fall within the definition of essential cookies, such as cookies used to analyse your behaviour on a website ("analytical" cookies) or cookies used to display advertisements to you ("advertising" cookies).

As set out in the UK's Privacy and Electronic Communications Regulations ("PECR") and the EU's Privacy and Electronic Communications Directive ("PECD"), we need to obtain consent for the use of Non-essential Cookies. For further information on the cookies we use, please refer to our Cookie Policy. The legal basis for processing is our legitimate interest and your consent.

Google Fonts

We integrate the fonts of the provider <u>Google LLC</u>, whereby the user's data is used solely for the purpose of displaying the fonts in the user's browser. The integration is based on my legitimate interest in a technically secure, maintenance-free and efficient use of fonts, their uniform display and taking into account possible licensing restrictions for their integration. The legal basis for this processing is our legitimate interest.

Google Maps

Our website uses Google Maps API to visually display geographical information. When using Google Maps, Google also collects, processes and uses data about visitors' use of the map functions. You can find more information about data processing by Google in the Google privacy policy. There you can also change your personal privacy settings in the Privacy Centre. The integration of Google Maps represents a legitimate interest.

Google reCAPTCHA

We also use Google's reCAPTCHA from Google LLC to check whether data input is made by a human being or by an automated program. For this purpose, reCAPTCHA analyses the behaviour of



the website visitor on the basis of various characteristics. This analysis begins automatically as soon as the website visitor enters the website. The legal basis for using reCAPTCHA is our legitimate interest.

Data we collect directly

Contacting us

You can easily contact us via email, phone or social-media. In this case, we store and process the following data from you: Name, e-mail address, telephone number as well as other personal data that you provide when contacting us. This data is collected and processed exclusively for the purpose of contacting you and processing your request and then deleted, provided there is no legal obligation to retain it. The legal bases for processing are contract and our legitimate interest.

We are present on social media (currently <u>Facebook</u>, <u>Instagram</u>, <u>LinkedIn</u> and <u>Twitter</u>). If you contact or connect with us via social media platforms, we and the relevant social media platform are jointly responsible for the processing of your data and enter into a so-called joint controller agreement. The legal basis is our legitimate interest, your consent or, in some cases, the initiation of a contract.

Data processing in the context of providing our services

The protection of your Personal Data is particularly important to us in the performance of our services. We therefore only want to process as much Personal Data (for example, your name, address, e-mail address or telephone number) as is absolutely necessary. Nevertheless, we rely on the processing of certain Personal Data, to fulfil our contractual obligations to you or to carry out pre-contractual measures and in the context of administrative tasks as well as organisation of our business, and compliance with legal obligations, such as archiving.

Business-related processing

In addition, we process Contract and passenger data (e.g., name of the passenger, contact number, e-mail address, journey details & destination (including any via points), date and time, number of passengers, luggage, hand luggage, fare, payment method info) of our customers, prospective customers for the purpose of providing contractual services, service and customer care, marketing, advertising, and market research. The purpose of the processing is the provision of contractual services, billing, and our customer service. We process data that is necessary for the justification and fulfilment of contractual services.

Contractual services

We process the data of our customers within the scope of our contractual services. In doing so, we process: inventory data (e.g., customer master data, such as names or addresses), contact data (e.g., e-mail, telephone numbers), content data (e.g., text entries, and messages), contract data (e.g., subject matter of contract, term), payment data (e.g., bank details, payment history). The purpose of the processing is the provision of contractual services, billing, and our customer service. We process data that is necessary for the justification and fulfilment of contractual services.

Data management and customer support

For optimal data management and customer support, we may store the data related to your use of our services with us in our Customer Relation Management (CRM) system. This data processing is based on our legitimate interest in providing our customer service.

Administration, financial accounting, office organisation, contact management

We process data in the context of administrative tasks as well as organisation of our business, and compliance with legal obligations, such as archiving. In this regard, we process the same data that we process in the course of providing our contractual services. The processing bases are our legal obligations and our legitimate interest.



Marketing

Insofar as you have given us your separate consent to process your data for marketing and advertising purposes, we are entitled to contact you for these purposes via the communication channels you have given your consent to.

You may give us your consent in a number of ways including by selecting a box on a form where we seek your permission to send you marketing information, or sometimes your consent is implied from your interactions or contractual relationship with us. Where your consent is implied, it is on the basis that you would have a reasonable expectation of receiving a marketing communication based on your interactions or contractual relationship with us.

Direct Marketing generally takes the form of e-mail but may also include other less traditional or emerging channels. These forms of contact will be managed by us, or by our contracted service providers. Every directly addressed marketing sent or made by us or on our behalf will include a means by which you may unsubscribe or opt out.

Economic analyses and market research

For business reasons, we analyse the data we have on business transactions, contracts, enquiries, browsing behaviour etc., whereby the group of persons concerned may include contractual partners, interested parties, and users of our services.

The analyses are carried out for the purpose of business evaluations and market research. The analyses serve us alone and are not disclosed externally and processed using anonymous analyses with summarised and or anonymized values. Furthermore, we take the privacy of users into consideration and process the data for analysis purposes as pseudonymously as possible and, if feasible, anonymously (e.g., as summarised data).

Principles of processing Personal Data

Storage and Retention

As far as necessary, we process and store your personal data for the duration of our business relationship, which also includes, for example, the initiation and execution of a contract.

In addition, we are subject to various storage and documentation obligations, which result from the minimum statutory retention periods in accordance with Companies House and HMRC among others. The retention and documentation periods specified there are two to six years.

Security

Our website uses SSL or TLS encryption to ensure the security of data processing and to protect the transmission of confidential content, such as orders, login data or contact requests that you send to us. We have also implemented numerous security measures ("technical and organisational measures") for example encryption or need to know access, to ensure the most complete protection of Personal Data processed through this website.

Nevertheless, internet-based data transmissions can always have security gaps, so that absolute protection cannot be guaranteed. And databases or data sets that include Personal Data may be breached inadvertently or through wrongful intrusion. Upon becoming aware of a data breach, we will notify all affected individuals whose Personal Data may have been compromised as expeditiously as possible after which the breach was discovered.

Special Category Data

Unless specifically required when using our services and explicit consent is obtained for that service, we do not process special category data.



Automated decision-making

Automated decision-making is the process of making a decision by automated means without any human involvement. Automated decision-making including profiling does not take place.

Do Not Sell

We do not sell your Personal Data.

Sharing and Disclosure

We will not disclose or otherwise distribute your Personal Data to third parties unless this is i) necessary for the performance of our services including our shipping forwarder and, ii) you have consented to the disclosure, iii) or if we are legally obliged to do so e.g., by court order or if this is necessary to support criminal or legal investigations or other legal investigations or other legal proceedings; or proceedings at home or abroad or to fulfil our legitimate interests.

International Transfer

We may transfer your Personal Data to other companies as necessary for the purposes described in this Privacy Policy. In order to provide adequate protection for your Personal Data when it is transferred, we have contractual arrangements regarding such transfers. We take all reasonable technical and organisational measures to protect the Personal Data we transfer.

Your Rights and Privileges

Privacy rights

Under the DPA and the GDPR, you can exercise the following rights:

- Right to information
- Right to rectification
- Right to deletion
- Right to data portability
- Right of objection
- Right to withdraw consent
- Right to complain to a supervisory authority
- Right not to be subject to a decision based solely on automated processing.

If you have any questions about the nature of the Personal Data we hold about you, or if you wish to exercise any of your rights, please contact us.

Updating your information

If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion, or object to its processing, please do so by contacting us.

Withdrawing your consent

You can revoke consents you have given at any time by contacting us. The legality of the data processing carried out until the revocation remains unaffected by the revocation.

Access Request

In the event that you wish to make a Data Subject Access Request, you may inform us in writing of the same. We will respond to requests regarding access and correction as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days, we will tell you why and when we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we will tell you why.



Complaint to a supervisory authority

You have the right to complain about our processing of Personal Data to a supervisory authority responsible for data protection. The supervisory authority in relation to our services is The Information Commissioner's Office (ICO), Wycliffe House, Water Ln, Wilmslow SK9 5AF, UK www.ico.org.uk. However, we would appreciate the opportunity to address your concerns before you contact the ICO.

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Validity and questions

This Privacy Policy was last updated on Sunday, 18th of June, 2023, and is the current and valid version. However, we want to point out that from time to time due to actual or legal changes a revision to this policy may be necessary. If you have any questions about this policy or our data protection practices, please feel free to contact us using peaktravelsltd@gmail.com, call 08008 611 786 or use our Contact Form.