



## PHOENIX ADVENTURES LTD PRIVACY POLICY

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur upon your first use of our Website. If you do not accept and agree with this Privacy Policy, you must stop using the Website immediately.

### 1. Definitions

In this Policy, the following terms shall have the following meanings:

<b>“Account”</b>	means an account required to access and/or use certain areas and features of the Website;
<b>“Cookie”</b>	means a small text file placed on your computer or device by the Website when you visit certain parts of the Website and/or when you use certain features of the Website;
<b>“Cookie Law”</b>	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
<b>“EEA”</b>	means the European Economic Area, which consists all EU member states plus Norway, Iceland and Liechtenstein;
<b>“personal data”</b>	means all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data you give to us, via the Website or otherwise. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“ <b>GDPR</b> ”);
<b>“we”, “us” and “our”</b>	Means Phoenix Adventures Limited, a limited company registered in England under company number 13688836 and whose registered address is Unit A, 82 James Carter Road, Mildenhall Ind Est, Mildenhall, Suffolk, IP28 7DE; and
<b>“Website”</b>	means phoenixadventures.co.uk

## **2. What does this policy cover?**

This Privacy Policy applies to your use of our Website and the services we provide. Our Website may contain links to other websites. We have no control over how your data is collected, stored or used by third parties or other websites. You should check the privacy policies of any such third parties or other websites before providing any data to them.

## **3. What data do we collect?**

Depending upon your use of our Website and services, we may collect some or all of the following personal data:

- 3.1 your name;
- 3.2 your date of birth;
- 3.3 your gender;
- 3.4 your business/company name;
- 3.5 your job title;
- 3.6 your profession;
- 3.7 your contact information, such as your email address(es) and telephone number(s);
- 3.8 demographic information such as your postcode and preferences;
- 3.9 financial information, such as your credit/debit card details;
- 3.10 your driving licence details;
- 3.11 your IP address;
- 3.12 your web browser type and version;
- 3.13 your device's operating system;

## **4. How do we use your data?**

- 4.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times.
- 4.2 Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of that personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data to:
  - 4.2.1 provide and manage your Account;
  - 4.2.2 provide and manage your access to the Website;
  - 4.2.3 personalise and tailor your experience on our Website;
  - 4.2.4 supply our services to you (please note that we require your personal data in order to enter into a contract with you);
  - 4.2.5 personalise and tailor our services for you;

- 4.2.6 reply to correspondence and messages from you;
- 4.2.7 send you account-related emails;
- 4.2.8 analyse your use of our Website to enable us to continually improve our Website and the user experience;
- 4.3 With your permission and/or where permitted by law, we may also use your data for marketing purposes, which may include contacting you by email **AND/OR** telephone **AND/OR** text message **AND/OR** post with information, news and offers on our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure we protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.
- 4.4 You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it. However, if you completely withdraw your consent for us to use your personal data, we will have to close your Account and, if relevant, cancel any bookings you have made.
- 4.5 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

## **5. How and where do we store your data?**

- 5.1 We only keep your personal data for as long as we need to in order to use it as described above in Clause 4 and/or for as long as we have your permission to keep it.
- 5.2 Some or all of your data may be stored outside of the EEA. You are deemed to accept and agree to this by using the Website and/or submitting information to us. If we do store data outside the EEA, we will take all reasonable steps to ensure your data is treated as safely and securely as it would be within the UK and under the GDPR.
- 5.3 Data security is very important to us, and to protect your data we have taken suitable measures to secure and safeguard the personal data we collect.

## **6. Do we share your data?**

- 6.1 We may share your data with other companies in our group. This includes our subsidiaries and our holding company and its subsidiaries.
- 6.2 We may sometimes contract with third parties to supply coach travel services to you on our behalf. These may include payment processing, delivery of goods, search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure your data will be handled safely, securely and in accordance with your rights, our obligations and the obligations of the third party under the law.
- 6.3 We may compile statistics about the use of our Website, including data on traffic, usage patterns, user numbers, sales and other information. All such data will be anonymised and will not include any personally identifying data, or any

anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners and advertisers. Data will only be shared and used within the bounds of the law.

- 6.4 In certain circumstances, we may be legally required to share certain data we hold, which may include your personal data – for example, where we are involved in legal proceedings, or where we are complying with legal requirements, a court order or a governmental authority.

## **7. What happens if our business changes hands?**

We may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of our business. Any personal data you have provided will, where it is relevant to any part of our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by us. If any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes.

## **8. Your right to withhold information**

You may access certain areas of our Website without providing any data at all. However, to use all features and functions available on the Website you will be required to submit or allow for the collection of certain data.

## **9. How can you access your data?**

You may ask for a copy of any of your personal data we hold. Under the GDPR, no fee is payable and we will provide all information in response to your request free of charge. To do so, please contact us using the contact details set out below in Clause 11.

## **10. Our use of Cookies**

10.1 Our Website may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by us and are used only by us. We use Cookies to facilitate and improve your experience of the Website and to provide and improve our services. We have carefully chosen these Cookies and have taken steps to ensure your privacy and personal data is protected and respected at all times.

10.2 By using the Website you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services and/or parties other than us. Third party Cookies are used on the Website for advertising services. These Cookies are not integral to the functioning of our Website and your use and experience of the Website will not be impaired by refusing consent to them.

10.3 All Cookies used by and on our Site are used in accordance with current Cookie Law.

- 10.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however, certain features of the Website may not function fully or as intended.
- 10.5 Certain features of our Website depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in Clause 10.6. Your consent will not be sought to place these Cookies, but it is still important you are aware of them. You may still block these Cookies by changing your internet browser’s settings, but our Website may not work properly if you do so. We have taken care to ensure your privacy is not at risk by allowing them.
- 10.6 Our Site uses analytics services provided by Google Analytics. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling us to better understand how our Website is used. This, in turn, enables us to improve the Website and the services offered through it. You do not have to allow us to use these Cookies; however, while our use of them does not pose any risk to your privacy or your safe use of the Website, it does enable us to continually improve our Website, making it a better and more useful experience for you. The analytics service(s) used by our Website use(s) the following Cookies to gather the required information:

<b>Name of Cookie</b>	<b>First/Third Party</b>	<b>Provider</b>	<b>Purpose</b>
Google Analytics	Google	Google	Website usage

- 10.7 You can choose to enable or disable Cookies in your internet browser. Most browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most browsers accept Cookies but this can be changed. For further details, please consult the help menu in your browser or the documentation that came with your device.
- 10.8 You can choose to delete Cookies on your computer or device at any time; however, you may lose information that enables you to access our Website more quickly and efficiently (including, but not limited to, login and personalisation settings).
- 10.9 You should keep your internet browser and operating system up-to-date and consult the help and guidance provided by the developer of your browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

## **11. Contacting us**

If you have any questions about this Privacy Policy, please contact us by email at [info@phoenixadventures.co.uk](mailto:info@phoenixadventures.co.uk) or writing to:

Data Protection Officer

Phoenix Adventures LTD  
Unit A, 82 James Carter Road  
Mildenhall Ind Est  
Mildenhall  
Suffolk, IP28 7DE

**12. Changes to this Privacy Policy**

We may change this Privacy Policy from time to time. Any changes will be posted on the Website and you will be deemed to have accepted the revised terms of the Privacy Policy on your first use of the Website following the alterations. You should therefore check this page regularly to keep up-to-date.