

About our Privacy Policy

At OFS Travel, your personal privacy is very important to us, and so is being transparent about how we collect, use, and share the information we hold about you. This policy is intended to help you clearly understand:

- [What information or data we collect about you](#)
- [How we use the information we collect from you](#)
- [How we share information we collect from you](#)
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Our Privacy Policy details our handling of information we collect about you when you use our travel products or services, or otherwise interact with us (for example, by attending our events), unless an alternative policy is displayed for specific instances. "OFS TRAVEL", "we" and "us" refers to OFS Travel Limited. OFS TRAVEL offers a wide range of products and services, including travel booking services (both corporate and leisure), event management and group travel services. We refer to all these products and services, together with others and our websites as "Services" for the purposes of this policy.

This policy also explains your rights, and the choices you can make about how we use the information you provide to us. This includes how you may object to certain uses of information about you, and how you can request access to or update information that we hold about you.

Where we provide the Services under contract with an organisation (for example your employer), that organisation controls the information processed by the Services. This Privacy Notice is intended to assist your employer in communicating your privacy rights to you. Your employer should ensure that your data is processed in line with all applicable national and international law, including the EU General Data Protection Regulation (GDPR) and in accordance with your instructions.

Please consult your employer for any notification required under other jurisdictions. For more information, please see Notice to End Users below.

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What information we collect about you

We collect information about you when either you or your employer provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

Account and profile information:

We collect information about you that we reasonably need for our business functions and activities and which is required by law. We use the information you provide to us to book and manage travel, accommodation, car hire, group events such as conferences and meetings, and other related products and services on your behalf and as your agent. We use your personal preferences and requirements when coordinating timetables and availability, and your financial and contact details to purchase, deliver and provide notifications of reservations and other communications related to these services. We may collect personal information about you such as:

- Your name;
- Your contact details, including residential or business address, telephone number and email;
- Company details (if applicable);
- Date of birth;
- Payment information; and
- Travel-related details including passport details, frequent flyer details, drivers licence and other similar information.

While you travel we will use your contact and itinerary information to facilitate your journey and deal with third-party suppliers on your behalf, and afterwards the relevant detail of your journey or event feeds into our billing processes. Where you have booked through a business we may provide your journey data and other associated reporting to the assigned business contact for management information.

For business or corporate customers, your access to the Services is provided via a contract between OFS TRAVEL and your employer, therefore our legal basis for processing your personal data under the GDPR is 'Performance of Contract'.

Content you provide through our software products and applications:

OFS TRAVEL's Services include software products and applications including but not limited to customer portals, APIs and mobile applications. As part of providing these Services, we collect and store content that you provide to us. This content may include any information about yourself that you choose to provide, records of your activity while using the Services, any messages you send, and any feedback you provide to us. This content also includes any files or links you upload to any of our Services.

We also collect content using analytics techniques that hash, filter or otherwise de-identify the information to exclude information that might identify you or your organisation; and we collect clickstream data about how you interact with and use features within the Services so that we may improve our customer experience.

Content you provide through our websites:

The Services also include our websites owned or operated by us. We collect other content that you submit to these websites or web services, which may include social media or social networking websites operated by us. For example, you provide content to us when you provide feedback or when you participate in any interactive features, surveys, contests, promotions, activities or events.

Information you provide through our support channels:

The Services also include our customer support, where you may choose to submit information regarding a problem you are experiencing with a Service. Whether you designate yourself as a technical contact, open a support ticket, speak to one of our representatives directly or otherwise engage with our support team, you will be asked to provide contact information, a summary of the problem you are experiencing, and any other documentation, screenshots or information that would be helpful in resolving the issue.

Payment information:

We collect certain payment and billing information when you register for certain paid Services. You might also provide payment information, such as payment card details, which we collect via secure payment processing services.

Information we collect automatically when you use the Services:

We collect information about you when you use our Services, including browsing our websites and taking certain actions within the Services.

Device and connection information:

We collect information about your computer, phone, tablet, or other devices you use to access the Services. This device information includes your connection type and settings when you access, update, or use our Services. We also collect information through your device about your operating system, browser type, IP address, URLs of referring/exit pages, device identifiers, and crash data. We use your IP address and/or country preference in order to approximate your location to provide you with a better Service experience. How much of this information we collect depends on the type and settings of the device you use to access the Services.

Cookies and other tracking technologies:

OFS TRAVEL and our third-party suppliers and partners, such as our advertising and analytics partners, use cookies and other tracking technologies (e.g., web beacons, device identifiers and pixels) to provide functionality and to recognise you across different Services and devices.

Information we receive from other sources:

We receive information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

Other services you link to your account:

We receive information about you when you or your administrator integrates or links a third-party service with our Services. For example, if you create an account or log into the Services using your Microsoft Account, we receive your name and email address as permitted by your Microsoft profile settings so that we can authenticate you. You or your administrator may also integrate our Services with other services you use, such as to allow you to access, store, share and edit certain content from a third-party through our Services.

The information we receive when you link or integrate our Services with a third-party service depends on the settings, permissions and privacy policy controlled by that third-party service. You should always check the privacy settings and notices in these third-party services to understand what data may be disclosed to us or shared with our Services.

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How we use information we collect from you

How we use the information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. Below are the specific purposes for which we use the information we collect about you.

To provide the Services and personalise your experience:

We use information about you to provide the Services to you, such as booking and managing travel and accommodation, renting vehicles, providing peripheral services such as visa assistance and travel insurance, arranging and managing events and tours, and providing travel technology solutions, among others.

We use the information about you to process transactions with you, authenticate you when you log in, provide customer support, and operate and maintain the Services.

Our Services also include tailored features that personalise your experience by automatically analysing your activities to provide search results, notifications, and recommendations that are most relevant for you. Where you use multiple Services, we combine information about you and your activities to provide an integrated experience, such as to allow you to find information from one Service while searching from another or to present relevant product information.

To communicate with you about the Services:

We use your contact information to send transactional communications via email and within the Services, including confirming your bookings, providing itineraries, providing customer support, and sending you technical notices, updates, security alerts, and administrative messages. These communications are part of the Services, and in most cases, you are unable to opt out of them. If an opt out option is available, you will find that option within the communication itself or in your account settings.

To market, promote and drive engagement with the Services:

We use your contact information and information about how you use the Services to send promotional communications that may be of specific interest to you, including by email. These communications are aimed at driving engagement and maximising what you get out of the Services, including information about new features, survey requests, newsletters, and events we think may be of interest to you. We also communicate with you about new product offers, promotions and contests. You can control whether you receive these communications as described below under "Opt-out of communications".

Customer support:

We use your information to resolve technical issues you encounter, to respond to your requests for assistance, to analyse crash information, and to repair and improve the Services.

For safety and security:

We use information about you and your Service use to verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies.

To protect our legitimate business interests and legal rights:

Where required by law or where we believe it is necessary to protect our legal rights, interests and the interests of others, we use information about you in connection with legal claims, compliance, regulatory, and audit functions, and disclosures in connection with the acquisition, merger or sale of a business.

With your consent:

We use information about you where you have given us consent to do so for a specific purpose not listed above. For example, we may publish testimonials or featured customer stories to promote the Services, with your permission.

Legal bases for processing (for EEA users):

If you are an individual in the European Economic Area (EEA), we collect and process information about you only where we have legal bases for doing so under applicable EU laws. The legal bases depend on the Services you use and how you use them. This means we collect and use your information only where:

- There exists a contract between OFS TRAVEL and you or your employer to provide the Services;
- We need it to provide you the Services, including to operate the Services, provide customer support and personalised features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your data to comply with a legal obligation.

If you have consented to our use of information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your information because we or a third party (e.g. your employer) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

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How we share information we collect

We take pride in providing you with our Services, and we want them to work well for you. This sometimes means sharing information with certain third parties. We share information we collect about you in the ways discussed below in order to provide the Services, but we are not in the business of selling information about you to advertisers or other third parties.

Sharing with third party service providers:

We share information with third party Service Providers that help us operate, provide, support and market our Services. We only provide enough information to fulfil our obligations to provide you with the Services and will not share any information without a legitimate and legal purpose.

Service Providers include travel providers such as airlines, hotels, rail providers, car rental providers, tour operators and event management companies, but may also include platforms such as Global Distribution Systems (GDS) that provide inventory and reservation services to travel agencies.

Sharing with third party technology providers:

We work with third-party technology providers to provide website and application development, hosting, maintenance, backup, storage, infrastructure, payment processing, analysis and other services for us, which may require them to access or use information about you. If a service provider needs to access information about you to perform services on our behalf, they do so under close instruction from us, including policies and procedures designed to protect your information.

Links to third party websites:

The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit information to any of those third-party sites, your information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit.

Third party widgets:

Some of our Services contain widgets and social media features, such as the Twitter “tweet” button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it.

Compliance with enforcement requests and applicable laws; Enforcement of our rights:

In exceptional circumstances, we may share information about you with a third party if we believe that sharing is reasonably necessary to (a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements, (b) enforce our agreements, policies and terms of service, (c) protect the security or integrity of our products and services, (d) protect OFS TRAVEL, our customers or the public from harm or illegal activities, or (e) respond to an emergency which we believe in good faith requires us to disclose information to assist in preventing the death or serious bodily injury of any person.

Sharing with affiliated companies:

We share information we collect with affiliated companies and, in some cases, with prospective affiliates. Affiliated companies are companies owned or operated by us. The protections of this privacy policy apply to the information we share in these circumstances.

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How we store and secure information we collect

Information storage and security:

OFS TRAVEL takes reasonable and appropriate measures to ensure and safeguard the confidentiality, integrity, and availability of your information.

Where we utilise a third-party to host applications, data storage systems, payment systems, virtual infrastructure or other components of our technology, OFS TRAVEL ensures that adequate contractual clauses are in-place, as well as conducting an appropriate vendor security monitoring and management program.

OFS TRAVEL conducts internal employee awareness training in the areas of data security and information privacy as part of our ongoing compliance programs. Staff are trained on the safe

handling of sensitive information and the correct processes to follow to minimise risks of a data breach.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

How long we keep information:

How long we keep information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymise your information or, if this is not possible (for example, because the information has been stored in backup archives), then we will securely store your information and isolate it from any further use until deletion is possible.

Account information:

We retain your account information for as long we continue to deal with you, and a reasonable period thereafter in case you decide to re-activate the Services. We also retain some of your information as necessary to comply with our legal and tax obligations, to resolve commercial disputes, to enforce contractual agreements, to support general business operations, and to continue to develop and improve our Services.

Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use the information to uncover collective insights about the use of our Services in general, not to specifically analyse personal characteristics about you.

Marketing information:

If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us or made a booking with us. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

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How to access and control your information

You have certain choices available to you when it comes to your information. Below is a summary of those choices, how to exercise them and any limitations.

Your choices:

You have the right to request a copy of your information, to object to our use of your information (including for marketing purposes), to request the deletion or restriction of your information, or to request your information in a structured, electronic format.

Below, we describe the tools and processes for making these requests. You can exercise some of the choices by logging into the Services and using settings available within the Services or your account.

Where the Services are administered for you by an administrator (see “Notice to End Users” below), you may need to contact your administrator to assist with your requests first. For all other requests, you may contact us as provided in the Contact Us section below to request assistance.

Your request and choices may be limited in certain cases: for example, if fulfilling your request would reveal information about another person, or if you ask to delete information which we or your administrator are permitted by law or have compelling legitimate interests to keep. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed.

Access and update your information:

Our Services and related documentation give you the ability to access and update certain information about you from within the Service. For example, you can access and update your profile information within your profile settings and modify content that contains information about you using the editing tools associated with that content. You may request access to other types of information using the details provided in the Contact Us section below.

Deactivate your account:

If you no longer wish to use our Services, you or your administrator may be able to deactivate your Services account. If you can deactivate your own account, that setting is available to you in your account settings. Otherwise, please contact your company administrator or account manager.

Please be aware that deactivating your account does not delete your information; your information remains visible to other Service users based on your past participation within the Services. For more information on how to delete your information, see below.

Delete your information:

Our Services and related documentation give you the ability to delete certain information about you from within the Service. For example, you can remove certain profile information within your profile settings. Please note, however, that we may need to retain certain information for record keeping purposes, to complete transactions or to comply with our legal obligations.

Request that we stop using your information:

In some cases, you may ask us to stop accessing, storing, using and otherwise processing your information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this policy.

Where you gave us consent to use your information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your information for marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your information, we will restrict any further use of your information until the request is honoured or the dispute is resolved, provided your administrator does not object (where applicable). If you object to information about you being shared with a third party, please contact your administrator or account manager to do so.

Opting out of communications:

You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences within your Service account settings menu, by contacting your account manager, or by contacting us via our privacy email address as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you may continue to receive transactional messages from us regarding our Services.

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Other important privacy information

Notice to end users:

Many of our products are intended for use by organisations. Where the Services are made available to you through an organisation (e.g. your employer), that organisation is the Controller of the Services and is responsible for the accounts and/or Service sites over which it has control. If this is the case, please direct your data privacy questions to your administrator, as your use of the Services is subject to that organisation's policies. We are not responsible for the privacy or security practices of an administrator's organisation, which may be different than this policy.

Even if the Services are not currently administered to you by an organisation, if you use an email address provided by an organisation (such as your work email address) to access the Services, then the owner of the domain associated with your email address (e.g. your employer) may assert administrative control over your account and use of the Services at a later date. You will be notified if this happens. Please contact your organisation or refer to your organisational policies for more information.

Our policy towards children:

The Services are not specifically directed to individuals under 16. We do not knowingly collect personal information directly from children under 16. We may collect information about children provided with the express consent of their parent or guardian (for example in the case of a family travel booking). If we become aware that a child under 16 has provided us with personal information without such consent, we will take steps to delete such information. If you become aware that a child has provided us with personal information, please contact our support services.

Changes to our Privacy Policy:

We may change this privacy policy from time to time. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, login screens, or by sending you an email notification. We will also keep prior versions of this privacy policy in an archive for your review.

We encourage you to review our privacy policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy. If you disagree

with any changes to this privacy policy, you have the option of discontinuing to use the Services as outlined above.

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How to contact us

If you have any enquiries, comments or complaints about this privacy policy or our handling of your personal information, please contact your account manager or consultant, or contact us at our OFS Travel Enquiries address below:

We will respond to any enquiries or complaints received as soon as practicable.

OFS Representative:

The Data Protection Officer

OFS Travel Limited

Grove Business Centre

Grove Technology Park

Wantage

Oxfordshire OX12 9F