

About our Privacy Notice

Diamond Travel Limited takes your privacy seriously and we are committed to protecting your personal information. Our Privacy Notice explains how we collect, use and share personal information in the course of our business activities.

About Diamond Travel

This website is operated by Diamond Travel Ltd, a company registered in England and Wales under Company Registration Number 4100025, with its registered office situated at 18 Corfe Way, Farnborough, Hampshire GU14 6TS.

This Privacy Notice covers Diamond Travel Limited, [its websites, mobile applications and mobile websites] except where you are notified of another privacy notice.

Providing your personal information

You do not have to provide your personal information to us, but if you do not provide certain information we will only be able to provide limited products and services to you. For example, where you refuse to provide mandatory travel information, we will not be able to arrange travel for you.

Updates

We may amend this Privacy Notice from time to time to keep it up to date with legal requirements and the way we operate our business. If we decide to change our Privacy Notice we will place any updates on this webpage. Please regularly check this webpage for the latest version of our Privacy Notice. If at any point we decide to make fundamental changes to our Privacy Notice, we will seek to inform you by notice on our website.

Third Party Websites

You might find external links to third party websites on our website. Our Privacy Notice does not apply to your use of a third party site. We are not responsible for the privacy practices of websites that are not operated by us and encourage you to read the privacy statements of any such third party site.

The personal information we collect and when and why we use it

Personal information we collect and use if you make a booking with us

When you book a flight, holiday, cruise or make other travel related bookings with us, we will collect, process and use personal information so that we can deal with all aspects of your booking.

Types of personal information we collect

The types of personal information we collect when you make a booking with us includes your:

- Full name
- Contact information (including phone and email)
- Date of birth
- Address
- Passport information

How we use this personal information

We use your personal information to:

- **fulfil our agreement with you** and/or deal with your booking or intended booking, including processing your booking, sending you your itinerary or other details relating to your booking, or contacting you if there is a problem with your booking
- **manage your wider travel and products or services requirements** (for example, liaising with and transferring your data to tour operators, airlines, service providers and/or travel facilitators so that they can facilitate your booking and/or your travel arrangements), this includes when you book a holiday package, hotel, car or other ancillary service which may be provided by us or third parties
- **process payments** for your booking, fulfil requests for refunds and for accounting or audit purposes
- **market our products and services** to you
- **as you may authorise or consent to additionally from time to time**

Special categories of personal information we collect and use

We also collect special categories of personal information. The types of special categories of personal information we collect when you make a booking with us include:

- Mobility information
- Dietary requirements

We use special categories of personal information to:

- **determine your fitness to travel** (for example, if you have a pre-existing medical condition which may make it unsafe to travel)
- **provide you with special assistance** (for example, where you tell us that you need an oxygen tank or a wheelchair) on our flights, at destinations or activities or at airports
- **fulfil special dietary requirements** you tell us about
- **address a security or medical incident**
- **comply with legal or regulatory requirements**
- **as you may authorise or consent to additionally from time to time**

We do not generally collect special categories of personal information from you (or those you are booking for), but where we do, we seek to minimise the collection and use of it and handle it with extra care. We also share this information with third parties (who help manage our business and deliver services [such as those parties who provide wheelchairs at airports]), and we transfer it globally.

Where you (or any passenger travelling) provides us with special categories of personal information you agree that you have voluntarily provided such information, and you consent (and the passenger travelling consents) for us to use that information for the purposes for which it was collected.

Making a booking on behalf of another person

If you are making a booking on behalf of another person(s), it is your responsibility to obtain their consent to make the booking and share their details with us (as anticipated by this Privacy Notice), which we will assume that you have done prior to making the booking. It is also your responsibility to represent that person during the booking process, which means that you will need to provide us with the information required to make a booking, such as the full name and passport details of the person concerned, and explain to that person how we will use their personal information as set out in this Privacy Notice.

Personal information we collect and use if you have any queries about any of our products or services

If you have any queries about any of our products or services, or compliments or complaints, we will need to collect information from you, including your contact details, in order for us to respond to your query or provide you with assistance. We will collect this information when you submit a form on our website, send us an email, call our customer service centre, visit a local office or retail centre, or contact us via another form of communication such as through social media.

Types of personal information we collect

The types of personal information we collect includes:

- Phone or email contacts
- Postal address

How we use this personal information

We use your personal information to:

- **address your inquiry or any other interaction with us** as efficiently as possible
- **to authenticate your identity** such as when you call our customer service centre
- **as you may authorise or consent to additionally from time to time**

Personal information we collect and use in the event of an emergency

Types of personal information we collect

The types of personal information we collect include:

- Phone or email contacts

How we use this personal information

We use your personal information to:

- **provide in-flight or on the ground medical support**
- **provide accurate and updated information to persons directly affected** by an emergency such as your next of kin and other relatives
- **provide information to emergency services, hospitals and clinics** if you are admitted to them on your medical condition
- **communicate to embassies and consulates** regarding their citizens
- **arrange a hotel booking** in the event re-accommodation is necessary
- **as you may authorise or consent to additionally from time to time**

Personal information we collect and use when you use our Website

Our website uses cookies. A “cookie” is a small computer file which is downloaded to your device. It collects information as to how you navigate our website and the internet, and helps us provide better services to you and tailor certain content. Cookies may collect personal information about you. For more information see our Cookie Policy.

Personal information we collect and use for legal, compliance, regulatory and crime detection and prevention purposes

We process your personal information so that we can meet our legal, compliance and regulatory obligations, for legal purposes, such as to respond to a valid legal claim, summons or regulatory order, and to protect our property, rights and interests as well as the property, rights and interest of other persons.

We also process your personal information for crime prevention and detection purposes, including the prevention of fraud for online payments, for identity verification, for credit checking and credit scoring purposes and accounting or audit purposes. If you visit one of our local offices, retail centres or other properties, you may be monitored by closed circuit television for security purposes. In each case, we do so in compliance with applicable laws.

Personal information we collect and use from third parties

We collect personal information from third parties who you have authorised to provide your personal information to us (for example, this may another person making a booking on your behalf, your travel companion, your travel coordinator, our promotion partners, social media and other digital platforms). We combine this information with the information we collect directly from you or about you for the purposes set forth in this Privacy Notice.

Personal information we collect and use when you are making a payment

We collect different personal information depending on your payment method (such as debit or credit card, bank transfer, cash). For example, for debit or credit card payments we may collect card numbers and address.

Legal basis for using your personal information

We will only collect, process use, share and store your personal information where we are satisfied that we have an appropriate legal basis to do this.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please *Contact us* if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	Performance of a contract with you

To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	Necessary for our legitimate interests (to develop our products/services and grow our business)

Sharing your personal information with others

We share your personal information in the manner and for the purposes described below:

- with third parties who deliver products and services to us.
 - bank and payment providers to authorise and complete payments;
 - with governments, government organisations and agencies, border control agencies, regulators, law enforcement and others as permitted or required by law, in relation to legal requirements as apply from time to time when travelling to or from a particular country, and to generally comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;
 - with third parties whose products or services you are purchasing via us or otherwise such as airlines, tourism agencies, hotel, transfer and car hire companies, tour and excursion providers or to tour operators, including if there is a problem with your booking so that we or the tour operator can resolve it with you;
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Personal information we collect and use for marketing purposes, profiling and analytics

How we use personal information to keep you up to date with our products and services

We use personal information to let you know about products and services that we think may be of interest to you etc. We make these decisions from knowledge of your previous enquiries or bookings.

We will only send you direct marketing, whether about us, carefully selected third parties or partners, products or services, in accordance with your marketing preferences. We may contact you by email, SMS/text, social media, or through other communication channels that we think you may find helpful. If at any time you would like us to stop sending you marketing material, [contact us](#) or choose the relevant "unsubscribe" option set out below.

How you can manage your marketing preferences

To protect your privacy and to ensure you have control over how we manage marketing with you (and provided that you have indicated that you would like to receive it):

- we will take steps to limit direct marketing to a reasonable and proportionate level;
- only send you communications which we believe may be of interest or relevance to you and at all times in line with your permissions, which, as appropriate, may include:
 - [this could include telling customers about products and services, and allowing third parties to send information about their products and services]
- you have the ability to change your cookie settings to block certain types of cookie - this is explained in more detail in our [Cookie Policy](#);
- you can click the "unsubscribe" link that you will find at the bottom of our emails which you receive from us, or you can unsubscribe by [contacting us](#) or changing your account settings which will remove you from the relevant marketing list;

Be aware that if you unsubscribe completely from our marketing communications we may be unable to notify you of tailored offers to meet your needs. If you do unsubscribe from marketing communications you will still receive operational and service messages from us regarding your booking, and responses to your enquiries made to us.

When and how we undertake analytics and profiling

Profiling

We use personal information such as previous enquiries and bookings for profiling. Some of the legitimate purposes we profile personal information include:

- to obtain a better understanding of what you would like to see from us and how we can continue to improve our services for you;
- to personalise the service and offers you receive from us;
- to provide you with tailored content online and optimise your experience of our website;
- to share marketing material we believe may be of interest to you, including from our third party partners;

- to help us operate our services more efficiently.

Where required under applicable privacy laws:

- we will take steps to ensure that prior to profiling your personal information for a legitimate interest that our legitimate interest is not overridden by your own interests or fundamental rights and freedoms; and
 - you may have rights to object to us profiling your personal information.
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Transferring personal information globally

Your personal information may be transferred outside your country of residence. Some other countries are subject to different standards of data protection than your country of residence.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law, and we only transfer personal information to another country where:

- we are satisfied that adequate levels of protection are in place to protect your information; and
- the transfers are fully managed to protect your privacy rights and interests and are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.

In the event your personal information is transferred to a foreign jurisdiction, it may be subject to the laws of that jurisdiction and we may be required to disclose it to the courts, law enforcement or governmental authorities in those jurisdictions.

You have a right to contact us for more information about the safeguards we have put in place to ensure the adequate protection of your personal information when this is transferred as mentioned above.

[How we protect and store your personal information](#)

Protection of your personal information

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to protect the personal information that you share with us and safeguard the privacy of such information. For example, the measures we take include:

- Paper information in locked cabinets
- Data on computers protected by passwords

Storage of your personal information

We keep your personal information for as long as is reasonably necessary for the purposes for which it was collected. For example, to manage bookings and provide you with any relevant products or services, as explained in this Privacy Notice. We will ensure that it is disposed of in a secure manner.

In some circumstances we may store your personal information for longer periods of time, for example, where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements. In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or

challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

If you require further information about how we retain particular information please **Contact Us**.

Cookies

For more information on how we use cookies please read our [Cookie Policy](#), where you can also find information so you can delete cookies or block certain types of cookie. You should note that this may have an impact on our ability to provide the Website services to you.

Legal rights available to help manage your privacy

If you are subject to laws that provide you with such rights, depending on certain exceptions, and in some cases dependent upon the processing activity we are undertaking, you may have certain rights in relation to your personal information:

- **To access personal information**
- **To rectify / erase ('right to be forgotten') personal information**
- **To restrict the processing of your personal information**
- **To object to the processing (including direct marketing) of personal information**
- **To transfer your personal information**
- **To obtain a copy of personal information safeguards used for transfers outside your jurisdiction**
- **To lodge a complaint with your local supervisory authority**

If you wish to access any of the rights set out above, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you. We reserve the right to charge a fee where permitted by law, for example, if your request is manifestly unfounded or excessive.

You can exercise your rights by emailing us at olein@diamondtravel.gmail.co.uk or by sending us a communication at Diamond Travel Ltd, 18 Corfe Way, Farnborough, Hampshire GU14 6TS].

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Right to access personal information

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of: the source of your personal information; the purposes, legal basis and methods of processing; the data controller's identity; and the entities or categories of entities to whom your personal information may be transferred.

Right to rectify or erase personal information

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object (see **right to object below**); or
- it has been processed unlawfully; or
- the personal information must be erased for compliance with a legal obligation under European Union or Member State law.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

Right to object to the processing (including direct marketing) of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

You can request that we stop contacting you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

If you have joined our mailing list, you can manage your marketing preferences automatically by clicking the "unsubscribe" link that you will find at the bottom of our emails which you receive from us, or you can unsubscribe by contacting us or changing your account settings which will remove you from the relevant marketing list.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

Right to restrict the processing of your personal information

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your [local supervisory authority](#) (i.e. your place of habitual residence, place of work or place of alleged infringement) if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.

How to contact us

The primary point of contact for all issues arising from this Privacy Notice is Olein Webster, who can be contacted at 01252 519669, olein@diamondtravel.gtmail.co.uk or 18 Corfe Way, Farnborough GU14 6TS].

Issue date of Privacy Notice: May 2018