

## **Railholiday Privacy Policy**

V.14-2-25

The Data Controller (the organisation responsible for looking after your data) is Railholiday Ltd ("we", "our", "us").

The collection and use of personal data is essential to the operation of our business and we are committed to protecting your information and have set out below the data protection principles we follow.

This policy covers our dealings with people who have booked or are looking for a holiday. Our customers must be over the age of 18 and we do not therefore collect personal information from children.

We will update our Privacy Policy as data protection law or business practice changes. You can always find the latest version of this policy on our website at:

[https://railholiday.co.uk/Railholiday\\_Privacy\\_Policy.pdf](https://railholiday.co.uk/Railholiday_Privacy_Policy.pdf)

### **Data Protection Officer**

Our Data Protection Officer is David Stroud, who may be contacted via email at:

Dave@Railholiday.co.uk or via post to: The Data Protection Officer, Railholiday Ltd, Haparanda Station, St Germans, Saltash, Cornwall. PL12 5LU.

### **Your rights**

We generally use your data either on the basis of your consent, or based on a contract between us (e.g. when you book a holiday). You have the right to withdraw your consent. All our marketing communications include an unsubscribe link, to make it easy to withdraw consent and if you do so, we will stop processing your data and you will stop receiving marketing information from us.

If you book a holiday with us we need to retain your data so we can process the booking. That is because the contract between us is the basis for using your data (rather than consent). For more information, see the Legal Basis of Processing section below. If you are concerned about the processing of your data, please contact our Data Protection Officer (see above). If you are unhappy with our use of your data, you also have the right to make a complaint to the Information Commissioners Office at <https://ico.org.uk>, which supervises data protection in the UK.

You have the right to receive a copy of your personal data. You also have the right to request that we correct or remove your data, when there remains no legal basis for keeping it. Please note that when these rights are exercised, we will conduct identification checks in order to ensure your privacy is safeguarded. You will need to contact us by email or post, to exercise these rights.

## **Personal Information we Collect**

In order to provide you with the best possible holiday service, we may collect the following information:

- Identification: name, title, age
- Contact details: postal addresses (main and billing), phone numbers, email addresses
- Account login details: email address, password (which is stored in encrypted form)
- Bookings: property booked, holiday start/end dates, cost of holiday, amounts paid, limited details of other people booked on the same holiday (names, gender, age range), preferences eg. diet, allergies,
- significant dates eg. birthdays, anniversaries
- Marketing preferences: whether you wish to receive marketing information from us, and if so, by which methods (postal, email, telephone, SMS)
- Payment: method, the last four digits of card numbers, payment card expiry date, amounts collected, third party payment service provider references. We do not capture or store your full card details when payment is made online as this is handled by our payment service providers (see below). When payment is made over the telephone, no payment card details are retained by us after being uploaded to our payment service provider.
- Browsing: historical searches, how you use our website and mobile apps, website experience user survey responses, the devices and IP addresses you use to access our services (operating system, browser). We collect this information so that we can continuously improve our website and our service to you
- Holiday experience: any feedback you leave, responses to surveys, whether you have a pet, interests (e.g. preferred holiday type, such as walking holidays)
- Communication: emails, customer service cases, responses to questionnaires, competition entries, your interaction with our marketing eg. we track when links are clicked in our marketing emails to help ensure our communications are relevant and interesting
- Electronic identifiers: cookies, IP addresses. These electronic identifiers are essential for you to get full functionality from our website, however you can disable cookies in your browser settings if you wish

Through our partnerships, we may receive some of the above information from other companies you use (e.g. other online holiday companies that feature our properties). In such cases, those companies must also inform you about their use of your data.

## **How we use your personal information**

We use your personal information to:

- Manage your holiday booking
- Manage your online accounts
- Process your payments
- Select the most appropriate holiday property for you and provide the best information, offers etc

- Communicate with you, including for example, responding to your emails, messages on social media, handling customer service matters
- Manage competitions, promotions and special offers in which you participate
- With your permission, send you relevant marketing information such as details of competitions, special offers and properties we think will be of interest to you
- Understand how to improve our services
- Detect and prevent fraud or abuse of our services
- Make sure our servers and websites are operating correctly

## **How we collect personal information**

We receive personal information from:

- You, as you provide it to us (e.g. when booking a holiday, leaving a review or enquiring about letting a property)
- Your use of our website
- Third party companies who advertise our properties
- Third party booking agencies such as Air BnB
- Your interaction with our marketing activities (provided you have not unsubscribed)
- Third party review services such as TripAdvisor

## **Legal basis of processing**

The grounds on which we will store and use your data are as follows:

Consent: for certain types of processing (e.g. marketing activities), we rely on your consent to use your data. You may withdraw your consent at any time (see Your rights, above).

Contract: much of the time, our use of your data will be because of the contract between us in relation to your holiday booking. We will usually retain relevant data for up to six years from the date the contract completes, generally the last day of your holiday.

Legal obligations: we are under binding legal obligations, such as accounting to the government for tax and making financial records available for audit, to retain data for up to seven years from the date of the transaction

Legitimate Interests: we use data to manage our operations and to make business process improvements. Our legitimate interests will never override your right to privacy

## **How we share your personal information**

Our booking system provider is Anytime Booking which is a trading name of Negys Ltd, 1st Floor, 19/21 Coinagehall Street, Helston, Cornwall, TR13 8ER. If you book direct with us online then you are entering your information onto their system. If you book over the phone or by any other means, we

will upload your details to their system. They are under strict obligations to protect your privacy and will only use your information to manage your holiday booking.

Card payments are processed by Secure Trading Limited, 19th Floor, 40 Bank Street, Canary Wharf, London, E14 5NR. They are fully Payment Card Industry Data Security Standard (PCI DSS) compliant and if you book online, they alone have access to your card details. If you book over the phone with us, your card details are entered online into the Secure Trading virtual terminal to process the payment. No record is kept by us of your card details.

If you permit us to send you marketing information:

- For our occasional marketing emails, we use a third party company called Mailerlite who hold your email address on a distribution list. Their privacy policy can be found here: <https://www.mailerlite.com/legal/privacy-policy>
- All our marketing emails have an unsubscribe link at the bottom
- Postal mailings are usually only once a year and include a newsletter. These are done in house and delivered by Royal Mail
- We may store your data in cloud services provided by third parties
- Those third parties do not have any right to access your data

### **Security of your data**

We protect your data with various technological measures. We regularly evaluate the security of our systems, updating safeguards as appropriate. Our staff are trained in the importance of data security and privacy and would treat a breach as a disciplinary matter.

### **Booking on behalf of others**

If you are booking a holiday on behalf of another person, perhaps as a gift, it is a condition of doing so that you have obtained the consent of that person for us to have their personal information. We will only use this information in connection with the booking and not for marketing purposes unless we have their consent to do so.