

PRIVACY NOTICE

Introduction

Travel Counsellors takes its data protection and privacy responsibilities seriously.

This privacy notice will inform you as to how we collect and process your personal data, including when we provide you with our services or products and when you use our websites, apps and social media channels. This privacy notice also explains how we protect your personal data, details of your privacy rights and how the law protects you.

Changes to our Privacy Notice and changes to your personal data

We keep our privacy notice under regular review and may make changes from time to time. Please check our website or MyTC App for the latest version.

It is important that the personal data that we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third party links

Our websites may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy policy applicable to any website you visit for awareness about how your data may be processed.

Our role and the role of our independent Travel Counsellors

Travel Counsellors Limited (“**Travel Counsellors**”, “**we**”, “**our**”) is a “controller” under data protection law. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection law to notify you of the information contained in this privacy notice.

Our independent franchisees, known as Travel Counsellors, are also controllers of your personal data under data protection law. In most circumstances, your Travel Counsellor will be a joint controller of your personal data which means that they jointly decide with us how your personal data is used and also have responsibilities in relation to your personal data under data protection law. For example, your Travel Counsellor will be a joint controller with us when we work together to provide you with your travel arrangements.

In certain situations, your Travel Counsellor is a separate controller of your personal data and solely responsible for determining how they use and process your personal data. For example, Travel Counsellors make their own decisions on how they market travel services to you or communicate with you. Please contact your Travel Counsellor if you have any questions regarding how they treat your personal data.

The data we collect about you

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Depending on how you interact with us, and the nature of our relationship with you, we may collect, use, store and transfer different types of personal data about you which we have grouped together as follows:

- **Identity Data** includes the first name, last name, username or similar identifier, marital status, title, date of birth, passport details (including passport number, nationality, date of birth, and expiry date) and gender of our customers and any other passengers we are providing travel services to (and which may include Identity Data of children passengers). Where you are a corporate traveller, Identity Data may also include your occupation and details of your employer or client, and the identity details of the account holder, persons authorised to make bookings, directors and shareholders.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers of the lead passenger and any other passengers or persons making a booking as required.
- **Financial Data** includes bank account and payment card details, as well as information on your payment history, outstanding debt and any failed payments.
- **Booking Data** includes details about payments to and from you, details of products and services booked by or for you, visa and travel insurance details, criminal offence data relevant to travel, and details of in-resort or travel issues (and which may include Booking Data of children passengers).
- **Travel Preferences Data** includes information regarding your travel preferences including dietary requirements, medical or health requirements and information relating to medical conditions or issues, religious beliefs, sexual orientation, details of additional assistance required (including accessibility requirements), details of preferred travel providers, location of closest or preferred airport.
- **Technical Data** includes internet protocol (IP) address, your login data for the MyTC App, browser type and version, browsing history, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites or MyTC App.
- **Profile Data** includes your username and password for the MyTC App, enquiries, purchases or previous bookings and orders made by you, your travel details including passport information, details of airline and hotel membership details, frequent flyer or loyalty scheme details, insurance details, your interests, preferences, feedback, complaints, and survey responses, emergency contact information and details of your next of kin or beneficiaries.
- **Usage Data** includes information about how you use our websites, products and services.
- **Marketing Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Data where you contact us by telephone to discuss our services** which includes your name, contact details and any information you provide, which may include special category data as defined below.
- **Data where you attend an event organised by us or you attend at our premises for any reason (Attendance Data)** which includes vehicle registration, dietary requirements, access support needs and CCTV images.

We may collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

Special Category Data and Criminal Offence Data

Special Category Data is data that is considered as likely to be more sensitive and requiring extra protection. This includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, information about your health, and genetic and biometric data.

Depending on the services that we provide to you, we may also collect, use, store and transfer the following types of special category data:

- **Health Data** including details of any medical conditions, issues or disabilities which you may need assistance and support with to travel or when at your travel destination, details of any pregnant passengers, and any in-resort medical issues, emergencies, or sickness which you require support or assistance with or that you bring to our attention whilst in resort or after travel.
- Certain identity and travel documents that you provide to us, such as passports and other government-issued identification, may contain information from which **racial or ethnic origin** could be inferred.
- **Data that reveals your religious or philosophical beliefs** including any dietary requirements or preferences that may reveal your religious beliefs that you provide to us as part of your travel preferences or otherwise.
- **Any relevant criminal offence data** that you make available to us where required for the purposes of providing you with our travel services, including information on any criminal record that may impact your ability to travel internationally and any motor vehicle offences which could impact on your ability to hire a car or other vehicle as part of your travel plans.
- **Any other special category data** that you provide or disclose to us in connection with the services and products that we provide.

If you do not provide us with your personal data

Where we need to collect personal data (including special category data) by law, or under the terms of a contract we have with you or that you have with a travel supplier, or in order to provide travel arrangements to you (whether as tour operator, or travel agent), and you fail to provide that data when requested, we or the travel provider may not be able to perform the contract that we have or are trying to enter into with you (for example, to provide you with travel arrangements). In this case, we may not be able to proceed with or may have to cancel a booking, but we will notify you if this is the case at the time.

How is your personal data collected?

We use different methods to collect personal data from you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone or otherwise. This includes personal data that you provide to us when you purchase products or services with us, create an account on certain of our websites or MyTC App and set up or complete a profile or traveller form, subscribe to our newsletter or request marketing to be sent to you, click on Travel Counsellors advertisements or sponsored links, enter a competition, promotion or survey, or give us feedback or contact us. We may record phone calls with you for quality assurance purposes, to make service improvements or for the detection, investigation and prevention of crime (including fraud).
- **Collected from your personal Travel Counsellor.** We may collect personal data directly from your Travel Counsellor which they have collected from you by post, phone, email, direct message or other forms of communication. This data is typically in relation to your travel arrangements but may also be when you

have subscribed to a newsletter or request marketing to be sent to you via your Travel Counsellor, or you provide feedback on our services to your Travel Counsellor.

- **Collected from our client, where you are a corporate traveller.** We may collect personal data from our corporate client where you travel for business. This data is typically in relation to onboarding the client (for example, verifying the identity of directors), your travel requirements and any bookings that you have with us.
- **Automated technologies or interactions.** As you interact with our websites or our MyTC App, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy for further details.
- **Service provider third parties and software providers.** We may receive personal data from our travel service providers who support us in making our services available to you including our travel providers, technical companies that provide software solutions that assist in booking and providing travel and payment solutions.
- **Other third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources which includes Technical Data from analytics providers and search information providers such as Google or information you have shared publicly, including on social media. If you are booking corporate travel, we may collect information from third party databases such as credit reference agencies and we may also verify information you provide to us from publicly available sources such as Companies House.

There may be circumstances where you share personal data with us about other individuals, e.g. when you are travelling with others or booking travel arrangements for someone else. By providing other people's personal data, you must be sure that they agree to this and that you are allowed to provide it. You should also ensure that, where appropriate, they understand how their personal data may be used by us.

In specific instances, we may collect data from other sources for the purposes set out in this notice.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.
- In limited circumstances, with your explicit consent or where the use of personal data is in your vital interests. We generally only rely on explicit consent to process special category data, or to send you direct marketing communications where you are an individual.

Purposes for which we will use your personal data

We set out below the ways we use your personal data and the legal bases we rely on. We have also identified what our legitimate interests are where appropriate. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of Data	Lawful basis for processing
To establish and manage our relationship with you, verify identity, undertake due diligence, comply with legal and regulatory requirements, including sanctions screening, fraud prevention, anti-money laundering and other compliance checks, and assess applications for credit facilities where applicable.	(a) Identity (b) Contact (c) Financial (d) Booking (e) Profile	(a) Performance of a contract with you (b) Compliance with a legal obligation (c) Legitimate interests (protecting our business, customers, suppliers and staff from financial crime, fraud, regulatory breaches and credit risk)
To make bookings for you and provide you with or arrange travel services, to liaise with our travel providers, and to provide you with ongoing support and assistance whilst in-resort or travelling	(a) Identity (b) Contact (c) Booking (d) Travel Preferences (e) Profile (f) Health (if relevant) (g) Racial or Ethnic Origin (if relevant) (h) Religious Belief (if relevant) (i) Criminal Offence (if relevant)	(d) Performance of a contract with you (e) Compliance with a legal obligation (travel regulations) (f) Legitimate interests (customer management, customer experience and customer service) (g) Consent from you (h) Necessary for vital interests
To process, administer and deliver your bookings, including: (a) Manage payments, fees and charges (b) Collect and recover money owed	(a) Identity (b) Contact (c) Financial (d) Profile	(a) Performance of a contract with you (b) Legitimate interests (account management, managing debt and recovering debts)
To provide any after-travel support and assistance and to deal with any after-travel issues To deal with complaints or legal claims	(a) Identity (b) Contact (c) Financial (d) Booking (e) Profile (f) Health (if relevant) (g) Other special category (if relevant)	(a) Performance of contract with you (b) Compliance with a legal obligation (travel regulations) (c) Legitimate interests (customer management, customer experience and customer service) (d) Consent from you

<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> (a) Notifying you of updates to our terms, documents, policies and other information (b) Notifying you of changes or updates required to your travel information or documents (c) Asking you to leave a review, take a survey, or provide feedback 	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of contract with you (b) Compliance with a legal obligation (c) Legitimate interests (keep our records updated and analysis of how customers use our services)
<p>To enable you to set up an account on certain of our websites (e.g. Planisto) and/or our MyTC App and/or access certain functionality (e.g. MyTC Insights and MyTC Online) and to enable you to use certain of our websites and/or other functionality and the MyTC App and manage your travel bookings</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Financial (d) Booking (e) Travel Preferences (f) Technical (g) Profile (h) Usage (i) Health (if relevant) (j) Racial or Ethnic Origin (if relevant) (k) Religious Belief (if relevant) (l) Criminal Offence (if relevant) 	<ul style="list-style-type: none"> (a) Performance of contract with you (b) Legitimate interests (managing provision of MyTC App and certain of our websites and other functionality to allow customers to manage bookings and analysis of how customers use our services and the MyTC App and our websites) (c) Consent from you
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Legitimate interests (to analyse how customers use our services, to engage with customers, to develop customer relationships and to grow our business)
<p>To administer and protect our business, the websites and MyTC App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Technical 	<ul style="list-style-type: none"> (a) Legitimate interests (in 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) Compliance with a legal obligation

<p>To deliver relevant website and social media content and advertisements to you, measure or understand the effectiveness of the advertising we serve to you and provide you with a personalised service</p>	<p>(a) Identity (b) Contact (c) Travel Preferences (d) Profile (e) Usage (f) Marketing and Communications</p>	<p>Legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our websites, systems, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Legitimate interests (to define types of customers for our services, to keep our websites updated and relevant, to maintain and improve our systems, to develop our business and to inform our marketing strategy)</p>
<p>To make improvements to our service, for quality assurance purposes and for the detection of crime (including fraud)</p>	<p>(a) Identity (b) Contact (c) Booking (d) Technical (e) Profile (f) Usage</p>	<p>Legitimate interests (to develop and improve our services and assist with training requirements)</p> <p>Compliance with a legal obligation</p>
<p>To make suggestions and recommendations to you about goods and services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications</p>	<p>Legitimate interests (to develop our services and grow our business)</p>
<p>Where you attend an event organised by us, whether on our premises or on a third party premises</p>	<p>(a) Identity (b) Contact (c) Financial (d) Attendance (e) Health (if relevant) (f) Religious Belief (if relevant)</p>	<p>(a) Performance of contract with you (b) Legitimate interests (to manage and organise events, to develop our business relationships and grow our business, to protect our staff and property, and to the security of our business) (c) Consent from you</p>

<p>To support our services, customer interactions, internal processes and service improvements using AI tools</p>	<p>(a) Identity (b) Contact (c) Booking (d) Technical (e) Usage (f) Profile</p>	<p>(a) Legitimate interests (service improvement, efficiency, customer experience) (b) Performance of a contract (c) Compliance with legal obligations</p>
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Marketing and Promotions

You will receive marketing communications from us if you have requested information from us or purchased travel services from us and you have not opted out of receiving that marketing.

We may also use your Identity, Contact, Booking, Travel Preferences, Technical, Profile and Usage Data to form a view on which products, services and offers may be relevant to you (we call this profiling). We may use carefully selected third party marketing companies to assist us to provide you with a personalised service, for example, to suggest appropriate additional services (such as transfers or tickets for local attractions) based on a booking you have made.

We do not sell your personal data to any third party for marketing purposes.

Opting Out

You can ask us to stop sending you marketing messages at any time by contacting us. Where you opt out of receiving these marketing messages, this will not apply to any personal data provided to us as a result of ongoing travel arrangements or future travel bookings and communications in relation to the same.

You can object to profiling used for direct marketing purposes at any time by contacting DPO@travelcounsellors.com.

Use of Artificial Intelligence (AI)

We may use Artificial Intelligence (AI) tools and technologies to support the delivery and improvement of our services, enhance customer experience, and increase operational efficiency.

We may use AI tools to:

- Assist in drafting communications and responding to enquiries
- Support customer service and provide more efficient responses
- Analyse information to improve our products, services, and systems
- Personalise recommendations and enhance your travel experience
- Support internal business processes, reporting, and decision-making

Where AI tools involve the processing of personal data, we ensure that:

- Only the minimum necessary personal data is used (data minimisation)
- Personal data is only used for specified and lawful purposes
- Appropriate safeguards are in place to protect your information

We do not knowingly use your personal data to train third-party AI models unless appropriate contractual, technical and organisational safeguards are in place.

AI tools are used to support our staff and processes. We do not rely solely on automated decision-making that produces legal or similarly significant effects on you without human involvement. Where AI is used to assist decision-making, appropriate human oversight is applied.

Some AI tools may be provided by third-party service providers. Where this is the case:

- We ensure appropriate contractual protections are in place
- Providers are required to process data only on our instructions
- Data protection and security standards are applied

Use of certain AI tools may involve processing personal data outside the UK or EEA. Where this occurs, we ensure appropriate safeguards are in place in line with applicable data protection laws (see International Data Transfers section).

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out under the *How we use your personal data* section above.

• Internal Third Parties including:

- Other companies in the Travel Counsellors group, both current and future.
- The Travel Counsellors, both current and future, acting as a joint controller or a separate controller depending on the circumstances (see section *Our Role* above) who provide and support our travel services.

• External Third Parties including:

- Travel suppliers including tour operators, airlines, hotels, accommodation providers, cruise companies, transfer service providers, rail and other transport providers, excursion providers, destination management companies (DMCs) and their agents or representatives.
- Professional advisers including lawyers, bankers, auditors, trust managers, and insurers.

- Regulatory authorities including HM Revenue & Customs, IATA (International Air Transport Association), CAA (Civil Aviation Authority), government authorities at the point(s) of departure and/or destination e.g. for immigration, border control and security purposes or other purposes they determine are appropriate.
- Service providers who support our business in a variety of ways including provision IT and system administration services, banking and payment services, marketing services, travel industry services (including airline seat providers, booking aggregators and other software solutions who enable us to provide and develop our travel services).
- Third parties who conduct credit, identity verification, sanctions screening, fraud prevention and other due diligence or compliance checks.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

We expect all third parties to respect the security and privacy of your personal data and to treat it in accordance with the law and for the specific purposes for which the personal data is disclosed.

International Data Transfers

We share your personal data within the Travel Counsellors group. This may involve transferring your data outside of the UK/EU.

As we provide international travel services, many third party suppliers are based outside of the UK/EU (as relevant) so their processing of your personal data will involve the transfer of data outside of the UK/EU (as relevant) so that we can provide our services to you and arrange your travel.

Where we transfer your personal data out of the UK/EU (as relevant), we do so under the terms of a contract with the external third party, and take steps to address that a similar degree of protection is afforded to your personal data, such as ensuring that the country where the personal data will be transferred has been deemed to provide an adequate level of protection for personal data, or by entering into specific contracts approved for use in the UK/EU (as relevant) to give personal data the same protection it has in the UK/EU (as relevant).

Data Security

We have put in place appropriate security measures to protect the security of your information and to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Additionally, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We also implement controls around the use of artificial intelligence tools, including access restrictions, data minimisation practices, and review processes to ensure personal data is handled securely and in accordance with this notice.

We have put in place procedures to deal with any actual or suspected data security breach and will notify you and any applicable regulator where we are legally required to do so.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation (in circumstances where your personal data may be relevant in such litigation).

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information indefinitely without further notice to you.

For further details on the retention of your data, please contact the data protection team at DPO@travelcounsellors.com or write to us at the postal address above.

Your Legal Rights

Under data protection laws you have the right to:

Request access to your personal information (commonly known as a **data subject access request**). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data, for example if you want to establish its accuracy or the reason for processing it.

Request the transfer of your personal data to you or to a third party.

Withdraw consent at any time in the limited circumstances where we are relying on consent to process your personal data. This will not affect the lawfulness of any processing conducted before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you.

If you wish to exercise any of the rights set out above, please contact DPO@travelcounsellors.com or write to us at the postal address above.

Fees and Charges

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We will require specific information from you to confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Response time

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is complex or you have made several requests. In this case, we will notify you and keep you updated.

Questions & Complaints

You have the right to make a complaint to the supervisory authority responsible for data protection in your country of residence, place of work, or where an alleged infringement has taken place. For individuals in the United Kingdom, this is the Information Commissioner's Office (ICO) (www.ico.org.uk). For individuals in the European Economic Area (EEA), this will be your local data protection authority.

However, before doing so, we encourage you to contact us in the first instance so that we have the opportunity to address your concerns or provide clarification. If you wish to make a complaint about how your personal data is handled, please contact us at DPO@travelcounsellors.com. A complaints form is available on request and may help us investigate your concerns more efficiently.

Last updated 18 June 2026