



## PRIVACY POLICY

### Overview

This Privacy Policy is designed to help you understand what Personal Information we collect, why we collect it, how we use it and who we share it with. It also explains the rights you have in connection with your Personal Information, including how to contact us or make a complaint.

This notice applies to Speldhurst Ltd T/A Herberts Travel, who we also refer to throughout as "we", "us" or "our". See below for our contact information.

Herberts Travel is registered (under the name Spedhurst Ltd) as a data controller with the Information Commissioner's Office, which is the UK's independent body set up to uphold information rights. As a data controller we are responsible for ensuring that when we process Personal Information we comply with UK data protection law.

If you have any questions about this policy, please get touch with Herberts Travel see below for our Contact information.

This Privacy Policy may be altered from time to time and particularly in response to guidance and best practice advice issued by the Information Commissioner's Office with regards to the change in data protection law in the UK on 25 May 2018. We will inform you of changes via email or via our website. This Privacy Policy was last updated on 21<sup>st</sup> May 2018.

### Glossary of key terms used in this privacy policy;

**We, us, our** Speldhurst UK Ltd T/A Herberts Travel Registered at Barford Road, Blunham, MK44 3NA

**Data Protection Officer** **Joel Boorman**

**Personal Information** Also referred to as 'personal data' and means information about a living person by which that person can be identified. Some of that information will identify the individual directly, for example by giving their name and email address.

**Special Category Personal Information**.....Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership. Genetic and biometric data. Data concerning health or sexual orientation.

**Website**.....The website at this address: [www.herberts-travel.co.uk](http://www.herberts-travel.co.uk)

### What Personal Information do we collect and use?

The type of Personal Information we collect, and process depends on our relationship with you and the context in which we obtain and use it. The list below sets out the

Personal Information we will or may collect depending on the circumstances.

Personal Information we may collect from our customers;

1. Your title;
2. Your first name;
3. Your last name;
4. Your age, date of birth;
5. Your postal address;
6. Your email address;
7. Telephone number.
8. Photo image required for bus passes.
9. CCTV images, if traveling on any of our vehicles.

Personal Information we collect from our employees;

1. Full name and title;
2. Date of Birth;
3. National Insurance number;
4. Proof of identification and address documentation;
5. Medical history;
6. Next of kin;
7. Bank details;
8. Gender;
9. Ethnic Group;
10. Other employment related information, (including CV's, references, etc.).

### **How Personal Information is collected and your responsibilities:**

We may collect Personal Information from you in person, via telephone, our Website or email communication.

The sources we may also collect Personal Information from include:

- Our information technology systems, e.g., our Website.
- Automated monitoring of our Website and other technical systems, such as our computer networks and connections, CCTV, communications systems, email, voicemail and instant messaging systems.

When you provide Personal Information to us relating to a third party, you confirm that you have any necessary permission or authority to do so. You are also responsible for ensuring that the provision of that Personal Information complies with data protection and other applicable law. You must have the authority to disclose personal data if it relates to someone else and all data disclosed should be complete, accurate and up to date.

## **CCTV CODE OF PRACTICE**

### Introduction

The monitoring, recording, holding and processing of images of distinguishable individuals constitutes personal data as defined by the GDPR. This code of practice is consequently intended to ensure that in its use of CCTV Herbets

Travel is fully compliant with the requirements GDPR as well as related legislation.

Location of CCTV Systems & Data this code of practice relates to CCTV systems installed at the operating premises of Herberts Travel and systems installed on various vehicles operated by Herberts Travel. Data may be stored on hard drives both at the offices of Herberts Travel as well as vehicles operated by Herberts Travel.

## **Ownership & Operation**

All of these systems and equipment are owned and operated by:

Herberts Travel  
Barford Road  
Blunham  
MK42 0LF

01234 342 057

## **RESPONSIBILITY**

Responsibility for implementing this policy rests with the directors of Herberts Travel.

The day to day management of the CCTV equipment shall be the responsibility of the directors and or a manager authorised by the directors.

## **PURPOSE**

CCTV systems employed by Herberts Travel are for the following purposes:

- to promote a safer working environment by deterring crime including theft, vandalism and crimes against individuals.
- to discourage delinquent and anti-social behaviour.
- to aid in the investigation of road traffic accidents and various incidents related to public transport.
- preventing and assisting in the resolution of cases of internal discipline.
- to assist in the overall good management of company properties and vehicles.

Where, in carrying out these purposes, images of members of the public or staff committing acts which may give rise to a criminal conviction are obtained, such images may be used as evidence in internal disciplinary hearings, third party disciplinary hearings and/ or criminal proceedings.

These systems must not be used for general surveillance of staff or members of the public.

## **Access to Data**

It is important that access to and disclosure of images is restricted and carefully controlled, not only to safeguard the rights of individuals but also to ensure that evidence remains intact should the images be required for evidential purposes.

Therefore, an effective management of the system needs to be adhered to.

## **Management of The System**

Effective management of the system requires that:

- hard drives should be securely locked.
- movement of hard drives should be recorded on the 'hard drive movement log'.
- any downloading of the hard drives should be recorded on the 'download report log'.
- any parties requesting access to the data must complete an 'application to access CCTV images' form.

## Rights to Access Data

Data may only be accessed if the reason for access falls within the stated purposes of the CCTV system. In addition, the police have access to the data under the provisions of the 'Police and Criminal Evidence Act 1984'. Access may also be obtained in connection with civil disputes by court order or be extended to lawyers acting for defendants or victims in connection with criminal proceedings. Please contact us for further details.

## Personal data of children

Any customer under the age of 18, will be prompted to confirm that their parent or guardian has read and accepted our Privacy Policy and consents to us handling the necessary personal data of the child, (see above in **What Personal Information do we collect and use**).

## Visitors to our website

We collect statistical information about the number of visitors to our Website. This information includes, pages visited, and content searched. Further information can be obtained from the Google Privacy Policy. We use this information to maintain and improve our Website and the services we provide and to analyse and understand what is of interest to our Website visitors, so we can improve and tailor the content and this data will not directly or indirectly reveal your identity.

We use technology to track the patterns of behaviour of visitors to our Website. This can include using a "cookie" which would be stored on your browser or the hard drive of your computing device.

The cookies are stored on your hard drive and will not harm to your computer. If you wish you can change your own computer's settings or firewall to disable cookies. You will be able to use most of the features when these are disabled.

## How and why we use your personal information

Under data protection law, we can only use your Personal Information if we have a proper reason for doing so, for example:

- to comply with our legal and regulatory obligations;
- for our legitimate interests (see below) or those of a third party;
- for the performance of our contract with you or to take steps at your request;
- you have given consent.

A legitimate interest is when we have a business or commercial reason to use your Personal Information, so long as this is not overridden by your own rights and interests. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights, before we process your Personal Information for our legitimate interests. We do not use your Personal Information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

In general terms we will collect Personal Information to:

- provide our services to you, to manage our relationship and comply with our legal obligations arising from it;
- provide you with information about our business and the services we offer including relevant communications;
- help us improve our business and the services we offer.

### **Change of purpose**

We will only use your Personal Information for the purposes for which we collected it, unless we reasonably 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 Information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

We may process your Personal Information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **Marketing communications**

Where you have requested that we do so, we may use your Personal Information to send you updates (telephone, post, email, or other electronic means) about our products and services, including renewals and services.

We will always treat your Personal Information with the utmost respect, and we will never sell or share it with other organisations for marketing purposes.

By registering with Herberts Travel and providing us with your email address, phone number and postal address and consenting to receive communication from Herberts Travel, you acknowledge that you will receive email notifications in relation to our products, services that you may be interested in e.g. Bus Pass renewals. This will usually be in the form of an email.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us via our website or by telephone 01234 342057;
- emailing us at [customerservices@herberts-travel.co.uk](mailto:customerservices@herberts-travel.co.uk);

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

### **Who we share your Personal Information with?**

We may share Personal Information with:

- Our professional advisers; e.g. lawyers, accountants, etc.;
- Other third parties where necessary to carry out your instructions,

Our IT support and service providers may also access your Personal Information as a consequence of them providing support to us.

We only allow our service providers to handle your Personal Information if we are satisfied, they take appropriate measures to protect your Personal Information. We also impose contractual obligations on service providers to ensure they can only use your Personal Information to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some Personal Information with other parties. For example, if we, in the course of our own business operations, sell or buy any business or assets we may disclose Personal Information held by us to the prospective seller or buyer of those businesses or assets.

Where possible, information will be anonymised, but the recipient of the information will be bound by confidentiality obligations. If we are acquired, or substantially all of our assets are acquired, by a third party (or are subject to a reorganisation), Personal Information held by us will be one of the assets which is transferred.

### **Where your Personal Information is held**

Personal Information will be held on the secure server at our offices, hard copy data will be held in a secure locked office, third party agencies, service providers, representatives and agents as described above (see Who we share your Personal Information with).

### **How long your Personal Information will be kept**

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

When it is no longer necessary to retain your Personal Information, we will delete or destroy it. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see, Your rights with respect to your Personal Information.

### **Customers**

We only keep your Personal Information for as long as is necessary to:

- provide you with our products and services;
- respond to any questions, complaints or claims;
- keep records required by law to comply with our legal obligations and our duties.

### **Complaints or requests**

If you are not a customer of ours but you complain to us about how we have processed your Personal Information or you seek to exercise a data protection right such as a data subject access request, we will retain details of your complaint or request. We will only use the Personal Information we collect to process the complaint or request, to audit the

level of service we have provided and to provide information to our insurers or regulator.

We will keep information in connection with the complaint or request in line with our policy. In most cases this means we will retain the information for six years.

### **How we protect your Personal Information**

Keeping information secure is a key part of data protection compliance. We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so or where we have otherwise agreed with you that we will.

We also maintain our own internal audit programme to verify that our staff are familiar with and adhere to our policies and procedures.

### **Your rights with respect to your Personal Information**

You are entitled at any time to ask us for a copy of Personal Information we hold about you, known as a data subject access request. You are also entitled to ask that any information we hold about you is supplemented, updated or rectified. You can make any of these requests free of charge by contacting us – see Contact Information.

In certain circumstances you can also ask us to restrict our processing of your Personal Information, e.g. if you contest the accuracy of it. We will always review your request and will inform you if we decide we are not required to action it. If you require us to restrict or stop processing your Personal Information in any way, this may impact on our ability to provide our services to you.

### **How to complain**

We hope that we can resolve any query or concern you may raise about our use of your information. If you want to complain about how we have handled your Personal Information, please follow the procedure in our Complaints Policy which is available on our website. We will investigate your complaint but if you are not satisfied with our response or believe we are processing your Personal Information unlawfully, you can complain to the UK Information Commissioner's Office. Further information is available on the ICO Website or telephone 0303 123 1113.

The EU General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in the European Union (or EEA)

State where you work, normally live or where any alleged infringement of data protection laws occurred. The UK supervisory authority is the Information Commissioner.

## Contact Information

Please contact us or our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

- Data Protection Officer: Joel Boorman
- Address: Barford Road, Blunham, Bedford MK44 3NA
- Telephone: 01234 342057
- Email: [customerservices@herberts-travel.co.uk](mailto:customerservices@herberts-travel.co.uk)