

**Lincolnshire Co-op Travel**  
**FAIR PROCESSING NOTICE**

**INTRODUCTION**

This is the Fair Processing Notice of the Travel Business Area of Lincolnshire Co-operative Ltd and should be read in conjunction with our Privacy Policy, which you can find at <https://www.lincolnshire.coop/privacy-policy>. Lincolnshire Co-operative Ltd (collectively referred to as "we", "us" or "our" in this Notice) is the controller and responsible for your personal data.

This Fair Processing Notice aims to give you information on how we collect and process your personal data, including any data you may provide through our website or via any other means (such as over the telephone) when you purchase travel services, when you sign up to our newsletter, or interact with the travel department.

**Contact details**

Our full details are:

Full name of legal entity:	Lincolnshire Co-operative Limited
Title:	Data Protection Officer
Email address:	<a href="mailto:dataprotection@lincolnshire.coop">dataprotection@lincolnshire.coop</a>
Postal address:	15-23 Tentercroft Street, Lincoln, LN5 7DB
Telephone number:	07485 900727

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues link is - ([Make a complaint | ICO](#)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please *contact us* in the first instance.

**Changes to the Privacy Policy and your duty to inform us of changes**

We keep this Notice under regular review. This version was last updated in June 2024 and historic versions can be obtained by *contacting us*. It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you provide to us should change, during your relationship with us.

**1. THE DATA WE COLLECT ABOUT YOU**

Personal data, or personal information, 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). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- (A) Identity Data**  
This includes data relating specifically to your identity, such as your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- (B) Contact Data**  
This includes data relating to how you may be contacted, such as your billing address, delivery address, email address and telephone numbers.
- (C) Financial Data**  
This include data relating to your means and methods of payment, such as your bank account and payment card details.
- (D) Transaction Data**  
This includes data relating to the transactions you have carried out with us, such as details about payments to and from you and other details of products and services you have purchased from us.
- (E) Technical Data**  
This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your login data, browser type and version, 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 this website.
- (F) Profile Data**

This includes the data that we receive when you create a profile on our website and make use of that profile, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

**(G) Usage Data**

This includes information about how you use our website, products and services.

**(H) Marketing and Communications Data**

This includes your preferences in relation to whether or not you want to receive marketing from us and our third parties and also your communication preferences.

**Special Categories of Personal Data**

We collect the following special categories of personal data about you. Details about your:

- dietary requirements which may disclose your religious or philosophical beliefs;
- health;
- race or ethnicity;
- sex life and/or your sexual orientation;
- Passport details showing gender and biometric details

We collect and process the above data only where it is strictly necessary to do so in order to deliver the travel service that you have purchased. Furthermore, we will only collect and process the above special categories of sensitive personal data where you have provided us with your explicit consent to do so.

You are not under any obligation to consent to us processing your sensitive personal data. However, without your consent, we won't be able to make the necessary arrangements to provide the travel services that you have booked or are attempting to book. As a result, if you do not provide your consent, we will be unable to proceed with your booking.

If you are happy to consent to our use of your sensitive personal data, you will also be able to withdraw your consent at any time. However, as this will prevent us from providing the travel service you have booked, we will be required to treat any withdrawal of consent as a cancellation of your booking and the cancellation charges referred to in our Booking Terms and Conditions will become payable.

**If you fail to provide personal data**

Where we need to collect personal data by law or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

In other words, where we require details from you in order to provide you with your chosen travel services, if you do not provide us with the necessary details then we will not be able to provide the services you have booked or are attempting to book.

In this case, depending upon when you fail to provide the necessary data, we may either not be able to process your booking or we may have to cancel your booking, in which case we will treat this as a 'cancellation by you' in accordance with our Booking Terms and Conditions. We will notify you if we are unable to process a booking or are required to cancel a booking for this reason.

**2. HOW YOUR PERSONAL DATA IS COLLECTED**

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

**(A) Direct interactions**

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- making an enquiry for a holiday booking;
- make a booking of travel services;
- create an account on our website;

- subscribe to our newsletter or other publications;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- give us some feedback; or
- purchasing currency

### 3. 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 or regulatory obligation.
- In particular, additional details may need to be included if you use credit reference agencies, fraud prevention agencies, allow users to interact with their website, or undertakes profiling or automated decision-making.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by *contacting us*.

#### Purposes for which we will use your personal data

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	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer.	(a) Identity; (b) Contact. (c) Travel information and destination (d) Marketing and Communication preferences (e) Passport Information	Performance of a contract with you.
To process and deliver your booking including:  (a) Manage payments, fees and charges; (b) Collect and recover money owed to us.	(a) Identity; (b) Contact; (c) Financial; (d) Transaction; (e) Travel Insurance and Indemnity details (f) Health and Special assistance data (g) Marketing and Communications.	Performance of a contract with you;
To manage our relationship with you which will include:	(a) Identity; (b) Contact; (c) Profile;	(a) Performance of a contract with you; (b) Necessary to comply with a legal obligation;

(a) Notifying you about changes to our terms or Privacy Policy; (b) Asking you to leave a review or take a survey.	(d) Marketing and Communications.	(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) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(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 make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To monitor our communications with you in order to check any instructions given to us, for training purposes, for crime prevention, to improve the quality of our customer service and to defend legal claims.	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (to assist us in training our employees and defend our business in the event of a claim).  (b) Necessary to comply with a legal obligation.

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

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

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by *contacting us* at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of a product/service purchase, product/service experience or other transactions.

### Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please *contact us*.

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.

#### **4. THIRD PARTY TRANSFERS**

Selected third parties, some of whom we appoint to provide services, including: business partners, subsidiaries, affiliates, suppliers, and sub-contractors for the performance of any contract we enter into with you including tour operators, insurance providers, airlines, customer survey providers in order to receive feedback and improve our services.

Additionally, we will disclose your personal information to the relevant third party: if we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer; if we are under a duty to disclose or share your personal data to comply with any legal obligation, to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, our regulator, or others. This includes exchanging information with other

#### **5. INTERNATIONAL TRANSFERS**

Some of our external third parties or tour operators are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK.

Where you have requested a booking for travel arrangements which are located or otherwise due to be fulfilled outside the UK, we will have to transfer your personal data to the suppliers fulfilling or providing those travel arrangements outside the UK in order to make your booking and for those suppliers to be able to provide you with the travel arrangements you have booked. Where we are unable to rely on one of the safeguards outlined below when transferring data to those suppliers outside the UK, we may rely on the derogation under Article 49 of the UK GDPR in order to transfer your personal data so that we can perform the contract we have with you. In these circumstances, we will contact you to explain the risks of transferring your personal data and obtain your explicit consent to do so. You acknowledge that where your personal data is transferred outside the UK, controls on data protection may not be as wide as the legal requirements within the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please *contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

#### **6. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, 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.

## 7. DATA RETENTION

### How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, 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 respect to our relationship with you.

For a maximum of 7 years after the end of our relationship with you unless obligations to our regulators or the law requires otherwise, or we are required to remove such data from our records. Transactional Information is kept for 4 years. In some circumstances you can ask us to delete your data: see our Privacy Policy for more information.

## 8. [Error! Bookmark not defined.](#)YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- (A) Request access to your personal data.
- (B) Request correction of your personal data.
- (C) Request erasure of your personal data.
- (D) Object to processing of your personal data.
- (E) Request restriction of processing your personal data.
- (F) Request transfer of your personal data.
- (G) Right to withdraw consent.

If you wish to exercise any of the rights set out above, please *contact us*.

### No fee usually required

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 may refuse to comply with your request in these circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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.

### Time limit to respond

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

## 9. [Error! Bookmark not defined.](#)Contact Us

If you would like to contact us with any queries or comments, please send an email to [dataprotection@lincolnshire.coop](mailto:dataprotection@lincolnshire.coop) or send a letter to Lincolnshire Co-op, 15-23 Tentercroft Street, Lincoln, LN5 7DB.