Travel Privacy Policy

The purpose of this statement is to provide information regarding how and why Mystic Isle Travel collect, process and store data, as well as providing the appropriate contact information should you wish to request the information we hold about you or request deletion of any data we hold about you.

Under the **EU General Data Protection Regulation (GDPR)** there are six lawful basis for processing personal data. These are detailed as follows:

- **Consent** – the individual has given clear consent for you to process their personal data for a specific purpose
- **Contract** – the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract
- **Legal Obligation** – the processing is necessary for you to comply with the law (not including contractual obligations)
- **Vital Interests** – the processing is necessary to protect someone's life
- **Public Task** – the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law
- **Legitimate Interests** – the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

Further information regarding the lawful basis for processing personal data can be found at ico.org.uk

Mystic Isle Travel Marketing and Sales Data

As an organisation that processes business related data, Mystic Isle Travel has assessed all six grounds for lawful processing of personal data and has selected 'Legitimate Interests' as the most suitable lawful ground for the processing of data for the purposes of Mystic Isle Travel marketing and sales.

Mystic Isle Travel collects, processes and stores data relating to businesses and decision makers. We believe that the individuals that we process the data of, are likely to have an interest in Mystic Isle Travel products and services. Deemed as 'Legitimate Interest' this is based upon specific criteria including the business industry sector, size of organisation as well as the individual's job function within the organisation. Our typical segmentation includes those within marketing, sales, business development, MD and owner related job functions, although this list is not exhaustive and other variables may apply.

We will only ever collect, process and store the essential information required for making contact with the data subjects within a business environment. The personal data we collect is limited to first name, last name, email address, business / home address and contact telephone numbers. Other business related data may also be processed including business name and job function, however we will never collect further personal data such as those classed under 'Sensitive Personal Data'.

The data collected will be used to communicate marketing and sales messages relating to Mystic Isle Travel products and services, based upon the job function held by the data subject. Mystic Isle Travel specifically only sends messages to those we believe are likely to be interested in Mystic Isle Travel products and services based upon the organisation they are employed by and based upon their job function within that organisation. Messages from Mystic Isle Travel could be delivered via email, social media, via telephone or any other business to business (B2B) marketing methods that may be relevant.

When you send Mystic Isle Travel an enquiry via our website you will be asked to provide your contact details. We will use the data you provide to process your request and may use it to inform you by email, telephone or mail about other Mystic Isle Travel products and services that we feel may be of interest to you, it is deemed that as you have visited Mystic Isle Travel website and provided us with your contact information that you are legitimately interested in our products and services. You have the right to object from any method of correspondence at any time by informing the telephone operator or by contacting us via any of the methods below.

How we Procure Data

At Mystic Isle Travel we procure data in a variety of ways, collected in line with the lawful basis of 'Legitimate Interests'. If you have received correspondence from us, we will have procured your data in one of the following ways:

- You have requested information from Mystic Isle Travel on a previous occasion
- Someone has sent us your e-mail address requesting information about our products and/or services be sent to you
- You or someone else has expressly shared your contact details with us for the purpose of receiving information now and/or in the future
- We have previously met at an event and your business card or contact details were handed to us willingly
- You or a business colleague has visited our website and we believe that there is a genuine legitimate interest in our services
- You have previously connected with a member of our team via social media and discussed our services
- A member of our team has found your business and your contact details online, believing that your business would genuinely be interested in Mystic Isle Travel products and services, based upon your job function aligning with our typical customer profiles they have made contact to introduce you to our products
- Your data has been purchased by a registered third party data supplier, which will have been segmented by industry, organisation size and job function based upon our typical customer profiles. (Due diligence checks around GDPR compliance will have been conducted accordingly).

Legitimate Interest Assessment (LIA)

Mystic Isle Travel has carried out a Legitimate Interest Assessment (LIA) as advised by the ICO. Based upon that assessment it is deemed that the rights and freedoms of the data subjects would not be overridden in our correspondence regarding Mystic Isle Travel and that in no way would a data subject be caused harm by our correspondence. Based upon our segmentation by organisation and by specific job function, coupled with our processing of personal data within the context of a business environment, we believe that any individual that receives correspondence from Mystic Isle Travel in a direct marketing or sales capacity, could be legitimately interested in Mystic Isle Travel products and services.

Per the ICO guidance, Mystic Isle Travel can confirm:

- We have checked that legitimate interests is the most appropriate basis
- We understand our responsibility to protect the individual's interests
- We have conducted a legitimate interests assessment (LIA) and kept a record of it, to ensure that we can justify our decision
- We have identified the relevant legitimate interests
- We have checked that the processing is necessary and there is no less intrusive way to achieve the same result
- We have done a balancing test, and are confident that the individual's interests do not override those legitimate interests
- We only use individuals' data in ways they would reasonably expect
- We are not using people's data in ways they would find intrusive or which could cause them harm
- We do not process the data of children
- We have considered safeguards to reduce the impact where possible
- We will always ensure there is an opt-out / ability to object
- Our LIA did not identify a significant privacy impact, and therefore we do not require a DPIA
- We keep our LIA under review every six months, and will repeat it if circumstances change
- We include information about our legitimate interests in our privacy notice

Data Storage and Retention

The data held within Mystic Isle Travel system is processed and stored in the UK within a secure environment.

Request for Deletion

If you make a request for deletion, we will remove any data we hold about you from Mystic Isle Travel system. Please make your request in writing by emailing: holidays@mysticisle.co.uk

Or by writing to: Data Compliance, Mystic Isle Travel, 63 Friar Street, Droitwich Spa, Worcestershire WR9 8EQ

Request for Data Held

You may request that we send you all of the data we hold that relates to you. Please make your request in writing by emailing: holidays@mysticisle.co.uk

Or by writing to: Data Compliance, Mystic Isle Travel, 63 Friar Street, Droitwich Spa, Worcestershire WR9 8EQ

This policy was last reviewed and updated on the 21st May 2018. Policies are periodically reviewed to ensure compliance with the current compliance environment.

For questions relating to this policy, please contact holidays@mysticisle.co.uk