

# Privacy Policy

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## *The ROL Privacy Promise*

At ROL Cruise your privacy is treated with respect. We promise that we will tell you what personal data we use and how we use it to ensure your holiday not only caters for your personal needs but is also safe. We will ensure compliance, from 25 May 2018 with the with the General Data Protection Regulations (EU) 2016/679, as well as with the Data Protection Act 1998 (and any amendment of or replacement for that Act) and the Privacy and Electronic Communications (EC Directive) Regulations 2003 (and any amendment of or replacement for those Regulations), and any other data protection laws that apply from time to time (the “**Data Protection Laws**”).

In this privacy policy, references to ‘ROL Cruise’, ‘we’, or ‘us’ mean Reader Offers Limited trading as ROL Cruise, a company registered in England and Wales with registration number 3036965 with its registered office address at 8<sup>th</sup> Floor, Becket House, 36 Old Jewry, London, EC2R 8DD. ROL Cruise is a data controller in that we determine the purposes and means of the processing of personal data that we collect. We are registered with the Information Commissioner’s Office under reference no. ZA332972. Any questions concerning personal data should be addressed to Client Services, ROL Cruise, Lexden House, London Road, Colchester CO3 4DB or email us at [DataRequests@rolcruise.co.uk](mailto:DataRequests@rolcruise.co.uk).

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 ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. As a travel business, we need to collect certain personal data from you to ensure that we can make the arrangements for your cruise holiday with the cruise operator and other suppliers, and, where we act as principal tour operator for your package, in order to perform your holiday contract services. We would also like to collect your personal data to able to provide you with details of future cruise holidays and for the other purposes set out in this policy.

Through our website we provide links through to certain third-party websites. If you access those websites via our website, any personal data you choose to provide to or is collected by the third-party website operator shall be subject to the third party’s privacy policy. Accordingly, ROL Cruise is not responsible for your information that third parties may collect through these websites and this Privacy Policy does not apply.

This Policy is organised into the following sections:

1. Personal data that we collect
2. Purposes for which we use your personal data
3. Security and retention of your personal data
4. Sharing your personal data
5. Your rights
6. Cookies and other tracking technologies
7. CCTV
8. Updates to our Privacy policy

### *1. Personal data that we collect*

Personal data means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. The information may enable us to identify you directly or may be a combination of data that we may hold. Please see below the types of personal data we may ask you to provide and examples of when we may request this.

<i>What information we may request:</i>	<i>When we may request this:</i>
<b>Your first name and surname and your contact details</b> <i>(E.g. Postal Address, Telephone number, email address)</i>	When you create an ROL account  When you make a booking with us  When you make an enquiry with us  When you join Cruise Miles  When you ask to receive Marketing from us  When you take part in our competitions When you submit one of our contact forms on our website When you attend an ROL event When you request a brochure from us
<b>Your passport number, insurance and next of kin details</b>	When you return our passenger information form
<b>Information about your health, mobility and dietary requirements</b> <i>(further information is provided below under Health and Mobility Information)</i>	At time of booking  Before travel
<b>Information about other passengers on your booking</b> <b>(first name, surname and contact details)</b>	At time of booking  When you request to add someone to your booking before travel
	When we take payment for your booking with us

<b>Payment details</b> (Transaction type, last 4 digits of card for card purchases only, Direct debit mandate forms)	When you purchase ROL Cruise vouchers or Cruise Miles
<b>Communications exchanged with us</b> (your letters, phone calls, emails or messages on our online chat service)	When you contact us When we contact you
<b>Your feedback (including name and email address)</b>	When you choose to supply this to us When you complete one of our feedback forms When you reply to an email from our third-party service provider
<b>Your preferences</b> (destinations, cruise lines, type of travel)	When you create an ROL account When you choose to provide this information
<b>Your posts and messages on social media directed to us</b> (including your name and any other personal data that you choose to provide)	When you interact with us on social media (NB we do not use this information)
<b>How you use our website</b> (see our Cookie Policy for details of cookies and other tracking technologies that we use)	When you navigate our website

## Health and mobility information

When you make an enquiry for a booking with us, we will ask you to disclose whether you have a medical condition or health issue or have any restrictions on your mobility. This is to enable us (and the operators/suppliers of your holiday) to provide for your health, safety and welfare during your cruise holiday which is our legal responsibility.

We will ask for your explicit consent for our use of this information at the time of requesting it, including our sharing of your information with the supplier or operator of your holiday only for the purposes set out above. If you choose not to disclose this information to us or your consent to use it for the outlined purposes, we may not be able to provide the services you have requested due to our legal responsibility to provide you with a safe holiday.

## Aggregated data

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate information about how you use our website and services to calculate the percentage of users accessing a particular website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

## 2. Purposes for which we process your personal data

### To manage and administer your travel bookings

When you book your cruise holiday with us we will use your personal data in order to perform the services you have agreed to purchase, including taking payment for your cruise holiday, making arrangements with the cruise operator and other suppliers for

your cruise holiday, issuing tickets, passing on your special requests to the cruise operator and other suppliers and otherwise administering and performing the booking contract that you have made with us. This may involve us sharing data with companies not established in the European Economic Area. See section 4 “Sharing your data” below as to the steps we take to ensure your data is protected in accordance with Data Protection Laws.

As a necessary part of administering and processing your travel booking we will need to use your personal data for accounting, billing and audit, credit or other payment card verification, fraud screening, safety and security purposes, internal systems testing and maintenance and development.

As stated in Section 1. above, with your explicit consent, any relevant health and mobility information that you provide to us will be passed to the cruise operator and other suppliers in order to provide you with a safe holiday.

Your personal data will also be used if you ask us to amend or cancel your booking. When administering and managing your booking we will contact you using the contact information you provided at the time of booking. Please note that these communications are not made for marketing purposes and as such you will continue to receive them from us even if you have told us that do not wish to receive marketing communications from us.

### **To communicate with you and manage our relationship with you**

If we have received a request from you, such as emailing us, telephoning us, filling in one of our webforms through our website or contacting us via social media (including from time to time, Facebook, Twitter, Instagram and YouTube), we will use the contact details you provide to reply to your request.

We value your opinion, so if you have travelled on one of our holidays we may send you a feedback request form to ask you for your views on your holiday and any concerns you have about the performance of the holiday contract. We will use this communication to manage our relationship with you as our customer and to improve our services and experience for customers.

In order to continually improve our service, we may use third party providers to collect feedback on our booking processes on our behalf, such as Feefo or other independent customer review companies. This may involve passing your name and email address to the third-party provider to enable them to send you an email invitation to provide feedback. Feedback is collected solely for our internal business use to ensure that we continually keep informed and to enable us to improve our service based on such feedback. Feedback that you provide will not be published without your prior written consent. You have a right to object to our use of your personal data for this purpose and we will immediately stop sharing your personal data with any external provider of a feedback service if you ask us to. We will ensure that any third-party providers is required to process the data in accordance with our instructions and the Data Protection Laws.

If you register for an ROL account, we will use the personal data that you provide to open the account to provide account services to you including providing details of your bookings and enabling you to manage your marketing preferences.

### **To personalise and improve our service**

We would like to use your personal data to tailor our services to your needs and preferences. This may include collecting information on your past bookings, information on how you use our website (such as which pages you visit and which offers you searched for most) as well as asking you for your preferred cruise line or destination. Please also see our Cookie Policy on our website for details of the cookies that we use to track your use of our website. We may use this information 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 to you. Our website may use SessionCam for analysis. SessionCam is a product that has been developed by SessionCam LTD. SessionCam may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. The information collected does not include bank details or any sensitive personal data. Data collected by SessionCam from "insert company name" website is for "insert company name" internal use only. The information collected is used to improve our website usability and is stored and used for aggregated and statistical reporting.

### **To inform you about new offers that you may like**

We would like to send you communications about new offers of cruises and related travel services that you may like to book with us. Offers may include products and services that you may wish to add to your booking such as airport and port parking, UK chauffer transfers, flight upgrade opportunities, UK overnight hotels with parking, and mobility equipment hire. If you have previously enquired about our holidays or have made a booking with us (and so have previously shown an interest in our products and services) we will send you marketing communications [by email and post] unless you tell us that you do not want to receive these. If you have not booked or enquired with us previously, then we will only send you details of offers if you have agreed to receive these, for example, when you subscribe through our website, sign up to become a cruise miles member, register on our website to receive offers or register for an ROL account. You can choose how you want to receive these communications – by email or by post or both. You may also make a request to receive marketing material from us over the phone or through managing your preferences in your ROL account area on our website.

Please note that we do not share your personal details with other companies for their own marketing purposes without your prior consent.

You can change your preferences concerning marketing communications at any time. You can do this by:

- clicking on the relevant unsubscribe link on any of our marketing related emails you may have agreed to receive from us;
- if you have registered for an ROL online My account, changing your marketing preferences in the 'update my preferences' section of your account;
- calling our Client Services team on 08001216191; or
- writing to us at to Client Services, ROL Cruise, Lexden House, London Road, Colchester CO3 4DB;
- Email us at [clientservices@rolcruise.co.uk](mailto:clientservices@rolcruise.co.uk)

### **To allow participation in our loyalty scheme, Cruise Miles**

When you make a booking with ROL Cruise you automatically earn “cruise miles” under our Cruise Miles loyalty scheme. We will use the personal data that you provided when you booked to tell you what number of miles you have accumulated under the scheme and how you may use your miles against future cruise holidays. See Cruise Miles Terms and Conditions for further details of the scheme. If you have consented to receive marketing communications from us, we will update you with Cruise Miles offers.

### **For other lawful purposes**

We will use your personal data for such other lawful purposes as are permitted under the Data Protection Laws and we will always obtain consent where required.

### *3. Security and retention of your personal data*

At ROL Cruise we respect your privacy and we take appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage to personal data. This includes, as appropriate: the pseudonymisation and encryption of personal data; the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services; the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

When you provide your personal data through our website, this information is transmitted across the internet securely using high-grade encryption. In addition to this, we do not record card payment details. This means we adhere to high security standards in order to protect your payment card details when you make a booking over the phone or pay your balance through the ‘my account’ area on our website.

Where we need to disclose your information to a third party for the fulfilment of your travel booking, we require that third party to have appropriate technical and organisational measures in place to protect your personal data and to process your data in accordance with our instructions.

The information that you provide to us will be held securely in our systems, which are located on our premises or those of an appointed third party. We will only allow access to your personal data by third parties who act for us for the purposes described in this privacy policy or for other purposes approved by you

We will only retain your personal data for as long as is appropriate and necessary for the purpose for which it is processed and we will limit the period for which personal data is stored to a minimum. To determine the appropriate retention period for personal data we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal requirements. You can request details of our retention policy. In

some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you. We will periodically review time limits for erasure. In addition, you have a right to have your personal data restricted or erased – see more details under Section 5 below.

#### *4. Sharing your personal data*

We will need to share your personal data with third parties involved in performing the travel services that you have booked. This may include sharing your personal data with:

- **Airlines and cruise lines operators**– for the purpose of fulfilling the flight and cruise elements of your holiday booking.
- **Other suppliers** – for the purpose of fulfilling other elements of your holiday. We may for example need to share your personal data with the companies who provide ground services for us in resort, the accommodation provider, and transfer and other transport providers.
- **Credit and debit card companies** - ROL Cruise shares some of your personal data, which includes information about your chosen method of payment, to the credit or debit card company that issues the card you use to make your booking. In order to ensure the security of your transactions and prevent or detect fraudulent transactions, we may also share your information with our fraud screening partner.

In the passenger information form sent to you after you book, we will ask you for your passport and visa information, insurance details and next-of-kin information and share this with the cruise line operator if they require it. We collect this information: to enable your entry to the various ports on your itinerary; and in the case of an incident during your cruise, to ensure that you are covered by insurance (including a medical evacuation) and to enable a next-of-kin to be contacted.

We will also need to share your personal data when necessary to comply with a legal obligation to which we are subject. This may include sharing your data with:

- **Authorities including the CAA** – We may also disclose your personal data to the Civil Aviation Authority (CAA), for the purposes of ensuring compliance with the enforcement of the Civil Aviation (ATOL) Regulations 2012 (as amended from time to time).

In addition, we may disclose your personal data when this is required by the law of any jurisdiction to which ROL Cruise may be subject.

We require any third party that processes your personal data on our behalf to comply with high security standards for the protection of your personal data, our instructions for processing your personal data, and all other requirements of the Data Protection Laws as applicable.

If your cruise holiday is supplied by a cruise operator or other supplier established outside of the European Economic Area and or involves travel outside of the European Economic Area (“EEA”), your personal data may need to be transferred outside of the

EEA in order to fulfil your booking. We will not transfer personal data outside of the EEA unless we have appropriate safeguards in place as required by the Data Protection Laws. If the country where the supplier is based has not been deemed to provide an adequate level of protection for personal data by the European Commission, we will have specific contracts approved by the European Commission which provide the same protection to personal data as it has in Europe. Where we use suppliers in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

We will not share your personal details with other companies for their own marketing purposes without your prior consent.

## *5. Your rights*

You have the right to request a copy of the personal data that we hold about you and to check that we are lawfully processing it (commonly known as a “data subject access request”) free of charge. Further copies may incur an administration charge. This could include booking information relating to holidays you have booked through us.

You can also ask us to rectify any errors in your personal data, complete any incomplete data that we hold, or transfer it to you or another person.

Where you have given your consent to our processing of your data, you have the right to withdraw your consent at any time. If you withdraw your consent and there is no other legal basis for us to process your data, you can ask us to erase your personal data. You can also require us to erase your data if we have processed your data unlawfully or if the law requires us to erase your data. We will not always be able to comply with your request for erasure or specific legal reasons which will be notified to you, if applicable, at the time of your request.

You may also restrict or suspend the processing of your data where you want us to establish the data’s accuracy, where we no longer need your data for processing but need your data for the establishment, exercise or defence of legal claims or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Where we process your personal data for direct marketing purposes, you have the right to object to such processing, including any profiling related to such direct marketing. We shall cease to process your data upon being notified of your objection. You have the right to object to any processing of your personal data where we are relying on a legitimate interest and you feel the processing impacts on your fundamental rights and freedoms. In some cases we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Full details of your rights are set out in the Data Protection Laws.

If you would like to request a copy of your personal data, want to object to any type of processing of your data or have any other requests, concerns or questions about your personal data, please contact us by writing to Client Services, ROL Cruise, Lexden

House, London Road, Colchester CO3 4DB or by emailing us at [DataRequests@rolcruise.co.uk](mailto:DataRequests@rolcruise.co.uk).

#### *6. Cookies and other tracking technologies*

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, we may use technologies, such as cookies, pixels and other tracking software.

Please see our cookies policy on our website for details of the cookies we use, the purposes for which we use cookies, when we need to obtain your consent to our use of cookies and how to disable cookies.

#### *7. CCTV*

We have CCTV cameras located on the outside of our main office building covering the car parks and entry and exit doors of our offices. This records images of visitors and staff and their cars and car registration plates. We use this data solely for the prevention and detection of crime and for protecting the safety of our staff and customers. It will not be used for other purposes. We conduct an annual review of our use of CCTV to ensure that it is necessary and proportionate to continue to use it. We retain CCTV data for 21 days but we may need to retain it for a longer period where a law enforcement body is investigating a crime and may ask for the opportunity for it to be preserved so that they can view the information as part of an active investigation. Access to CCTV footage is restricted and it is kept securely.

#### *8. Updates to our Privacy Policy*

We may make changes to this privacy policy from time to time and will publish on our website any new version of this policy. Past versions of the policy may be obtained by contacting us.

