

## **Privacy Policy**

This Privacy Policy explains The Abbey Group responsibility to personal information (how it's gathered, used and kept secure & private).

## 1. Identity and contact details

Company name, head office address & number: Abbey Tours Ltd T/A Abbey Group, Merchants Hall, 25/26 Merchants Quay Dublin 8, D08 NT3K, Ireland

Company Reg. Number: 393498.

Companies under the Abbey Group:

- Abbey Ireland Merchants Hall, 25/26 Merchants Quay Dublin 8, D08 NT3K, Ireland Tel: 0035316486100
- Abbey UK
  - Scotland office: 67 Shandwick Place, Edinburgh EH2 4SD, Scotland Tel: 00441316565900
  - London Office: 1-3 Staple Inn, London WC1V 7QH, England Tel: 00442077307182
- Moloney & Kelly 5 City Gate, Bridge Street Lower, Dublin, D08 DV07, Ireland Tel: 0035316909450
- Abbey Conference & Events Merchants Hall, 25/26 Merchants Quay Dublin 8, D08 NT3K, Ireland Tel: 0035316486100

Email Address: privacy@abbey.ie

The Abbey Group will be referred to as A.G. in this privacy policy.

A.G.'s Privacy policy applies only to the following:

- Abbey's Clients.
- Abbey's Suppliers (contracted & not contracted).
- Personal data gathered on A.G.'s Websites and Applications.

Since A.G. is responsible for the personal data of this grouping, A.G. is then considered the data controller, which means that A.G. is in control of how the grouping's personal data is stored, processed or transferred. Personal data will only be dealt with in accordance to this Privacy Policy.

A.G.'s Privacy Policy does not apply to personal data of the people (PAX) in the actual bookings. The data controllers of this data is the company who the PAX made the booking with AKA The travel agent or supplier (e.g. the hotel the guest is staying at). Contact the relevant data controller directly if any questions on PAX personal data occur.

#### 2. Data Protection Officer Information.

You can contact A.G. at <a href="mailto:privacy@abbey.ie">privacy@abbey.ie</a> or by writing to the at: Data Protection, Abbey Ireland & UK, Merchants Hall, 25/26 Merchants Quay Dublin 8, D08 NT3K, Ireland

## 3. Purposes and legal basis of the processing

Why A.G. needs to process data of those who are affected by this Policy are as follows:

- To fully perform an existing contract or to start negotiations to entering a new contract.
- To provide requested services and to contact (if required) in connection with enquiries, booking or to respond to any communications send to us.
- For legit business interests. Primarily future marketing purposes, including, but not limited to product offers and product information communications.

Any other data processing will be done in accordance of the GDPR.

### 4. The categories of personal data concerned

A.G collects the following information in order for the purpose of processing:

- Name
- Address
- Email address
- Telephone number
- Billing & Payment information.

A.G. gather statistical and other analytical information collected on an aggregate basis of all visitors to our website. This data comprises information that cannot be used to identify or contact user, such as demographic information regarding, for example,

- User IP addresses.
- Browser types
- Anonymous statistical data involving the use of our website.

This information is solely used to gain a more informed understanding of how our websites are being used and to make our websites more relevant to our users.

Note – A.G. Websites uses session cookies. Cookie consent is obtained either explicitly or implicitly requested via an opt-in or text message.

A.G. receives personal data through the following means:

- Supplier/Client Form.
- Through contractual negotiation and agreements.
- Corresponding through email or phone

#### 5. The recipients of the data

The recipients of the data are the A.G. staff (Permanent, fixed term, contracted or trainee staff) who process the data only in the ways that have been defined in purposes and legal basis of the processing. Each Staff member of A.G. have been educated and train in the importance of GDPR.

A.G. may share personal information with any company within The Abbey Group (Abbey Ireland, Abbey UK, Moloney & Kelly and Abbey Conference & Events) for the purposes defined in this privacy policy only.

## 6. Personal data to a third country or international organisation

A.G. will not disclose Personal Data to third parties unless A.G. has consent to do so or unless the third party is required to fulfil a contracted task (e.g. data entry in such circumstances, the third party will have a data processor agreement signed to adhere to GDPR).

A.G. will disclose Personal Data if it is believed in good faith that A.G. are required to disclose it in order to comply with any applicable law, a summons, a search warrant, a court or regulatory order, or other statutory requirement.

The only exception to this policy occurs in the event of a sale, merger, receivership or liquidation or transfer of all or substantially all of the assets to A.G., provided that the third party agrees to adhere to the terms of the Privacy Policy and provided that the third party only uses data for the purposes that you provided it to A.G.. Those effected by this privacy policy will be notified in the event of any such transfer.

### 7. How long will the personal data be stored for

A.G. will retain personal data the following reasons (only exception to these reasons are if A.G. is required or permitted by law to hold onto the information a specific amount of time):

- Data that is required in order to perform a contract, will be held on A.G.'s system for a seven year period following completion of a travelling Pax's trip (or upon contract termination, if later).
- For legit business interests (as defined in purposes and legal basis of the processing)
   Data that is no longer deemed necessary will be deleted from our system

When personal data is deemed no longer necessary, it will removed and deleted in a correct manner.

#### 8. Data subject's rights

Those affected by this privacy policy have the following rights:

- Right to access: the right to request, access and copy of the personal information that
  A.G. is holding. A.G. can charge a reasonable fee for 2 or more personal data requests.
  On copy of personal data will be charged at no cost. Any access requests will need to be
  requested in writing or email (Mailing & Email address provided in the Data Protection
  Officer Section above). Evidence of identification will be required as this makes sure that
  the personal information is not given to the wrong person. Information will be given within
  30 days.
- Right to rectification: the right to have personal data rectified if it's incorrect, out of date or incomplete.
- Right to be forgotten: the right to withdraw consent given to process data and the right to request that A.G. delete personal data from the A.G.'s System (only exception to this is A.G.'s compliance to with an legal obligations or if the data is required for any legal claims)
- Right to restriction: The right to stop A.G. from using personal data or limit how it is used.
- Right to Data portability: The right to request that A.G. return any information provided in a structured, commonly used and machine-readable format also have the *right* to transmit *data* to another controller without hindrance from A.G.

• Right to object: The right to object how A.G. is uses the personal data received (e.g. marketing purposes).

Note – Withdrawal of consent will lead to A.G. being unable to provide access to all or parts of the services A.G. provides to those who are affected by this privacy policy.

# 9. Lodging a complaint

Any complaints on how A.G. uses personal data can be sent to the Data Commissioner's office. More information can be provided on their website: <a href="https://www.dataprotection.ie">www.dataprotection.ie</a>