

PRIVACY POLICY

We are committed to protecting and respecting your privacy.

This policy was last updated on 24.05.2018.

OVERVIEW

When you use our site or contact us we may collect personal information about you. This Privacy Policy describes:

▪ What Personal Information We Collect About You	▪ What Choices You Have About What We Can Do With Your Personal Information
▪ How We Collect This Personal Information	▪ How Long We Keep Your Personal Information
▪ How We Use Your Personal Information	▪ How To Access And Update Your Personal Information
▪ Recruitment	▪ Who We Are And How To Contact Us
▪ Who We Share Your Personal Information With	

PERSONAL INFORMATION THAT WE COLLECT FROM YOU

We will collect personal information from you including:

▪ your full name, address, date of birth, email address and phone number	▪ the communications you exchange with us
▪ your preferences, requirements, special assistance and if you tell us, information about your health that may affect your travel arrangements	▪ information related to the products and services you purchase from us or our partners
▪ personal information as set out above about other party members in your booking	▪ your feedback
▪ your image and likeness as captured by our CCTV cameras at our offices or events	▪ your financial and payment details
▪ your posts on our social media pages	▪ how you use our website

HOW WE COLLECT THIS PERSONAL INFORMATION

In most cases, we will collect personal information from you directly. We will collect personal information about you when you:

▪ contact us via email, telephone, SMS, instant messenger or otherwise communicate with us	▪ place an order on our site or via telephone or email
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▪ fill in forms on our site	▪ interact with us on social media
▪ provide us with personal information about yourself in order for us to provide you with the services that you have requested	▪ where you have provided your personal information to a third party and have opted-in to other third parties, such as ourselves, to contact you
▪ you speak to one of our Event Team whilst at an event	▪ enter a competition, promotion or survey
▪ you attend our offices or speak to one of our staff	

PERSONAL INFORMATION WE RECEIVE FROM OTHER SOURCES

Sometimes we work with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) who may provide us with personal information about you.

If you are a business customer, we may also collect information from other people within your business or your business contacts and from publicly available sources such as Companies House.

GROUP BOOKINGS AND LEAD BOOKERS

We will collect personal information about all persons travelling within a group (1 or more people). If you are booking or making an enquiry on behalf of someone else you must have their consent to allow us to collect and use their personal information in the ways described in this Privacy Policy. As such you should draw their attention to this Privacy Policy prior to submitting their personal information.

SPECIAL CATEGORIES OF PERSONAL DATA

To provide our products and services to you, we may need to collect information regarded as “Special Categories of Personal Data”. We only collect this information where you have given your explicit consent or where it is necessary to meet your requirements. Where the Special Categories of Personal Data are relevant to the provision of goods and services (for example, food allergies), we will need to provide that information to our service providers (for example transport, hotels).

For example, you may provide us with Special Categories of Personal Data when you inform us of:

▪ a specific medical condition	▪ specific dietary requirements
▪ a requirement for special assistance	▪ your passport information

If you provide us with any Special Categories of Personal Data you explicitly agree that we may collect and use it in order to provide our products and services and in accordance with this Privacy Policy.

If you do not allow us to process any Special Categories of Personal Data, this may mean we are unable to provide all or parts of the services you have requested from us. In such circumstances you will not be entitled to cancel or obtain a refund of any price you have paid.

HOW DO WE USE YOUR PERSONAL INFORMATION

We use personal information held about you to:

- carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us
- communicate with you and manage our relationship
- personalise and improve your customer experience
- provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you
 - *existing customers*: we will only contact you by electronic means (email or SMS) with information about goods and services similar to those which were the subject of a previous sale to you or where you have consented to this
 - *new customers*: where you permit selected third parties to use your data, we (or they) will contact you by electronic means (email or SMS) only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please leave blank the relevant box situated on the form on which we collect your data
- ensure that content from our site is presented in the most effective manner for you and for your computer
- administer our site and for internal operations, including troubleshooting, data analysis, testing, research, security, site improvements, statistical and survey purposes
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
- notify you about changes to our service
- We operate CCTV for the following purposes:
 - health and safety of our employees, and other members of the public
 - prevention and detection of crime and anti-social behaviour

RECRUITMENT

JOB APPLICANTS, CURRENT AND FORMER EMPLOYEES

If you have any queries about the process or how we handle your information please contact us at recruitment@mikeburton.com.

WHAT WILL WE DO WITH THE INFORMATION YOU PROVIDE TO US AS PART OF OUR RECRUITMENT PROCESS?

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

WHAT INFORMATION DO WE ASK FOR AND WHY?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You do not have to provide what we ask for but it might affect your application if you don't.

We will collect the following information up to and including the shortlisting stage of the recruitment process:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- You will be asked to complete a criminal records declaration to declare any unspent convictions.
- We will provide your email address to the Government Recruitment Service who will contact you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
- We will contact your referees, using the details you provide in your application, directly to obtain references.
- We will also ask you to complete a questionnaire about your health. This is to establish your fitness to work. This is done through a data processor (please see below).

If we make a final offer, we will also ask you for the following:

- Bank details – to process salary payments
- Emergency contact details – so we know who to contact in case you have an emergency at work
- Membership of a Civil Service Pension scheme – so we can send you a questionnaire to determine whether you are eligible to re-join your previous scheme.

APPLICATION STAGE

We will ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.

You will also be asked to provide equal opportunities information. This is not mandatory information – if you do not provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

SHORTLISTING

Our Human Resources team shortlist applications for interview. They will not be provided with your name or contact details or with your equal opportunities information if you have provided it.

ASSESSMENTS

We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by us.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

CONDITIONAL OFFER

If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

USE OF DATA PROCESSORS

Data processors are third parties who provide elements of our recruitment service for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

MOORE PAY SERVICES

If you are employed by the Mike Burton Group, relevant details about you will be provided to Moore Pay Services who provide payroll services to the Mike Burton Group. This will include your name, bank details, address, date of birth, National Insurance number and salary.

PENSION SCHEME

Your details will be provided to Scottish Widows who are the administrators of the Mike Burton Group pension scheme. You will be auto-enrolled into the pension scheme and details provided to Scottish Widows will be your name, date of birth, National Insurance number and salary. Your bank details will not be passed to Scottish Widows at this time.

RECRUITMENT AGENCIES

For some vacancies, we sometimes advertise through recruitment agencies. These recruitment agencies will collect the application information and might ask you to complete a work preference questionnaire which is used to assess your suitability for the role you have applied for, the results of which are assessed by recruiters. Information collected by recruitment agencies will be retained for 12 months following the closure of the campaign.

HOW LONG IS THE INFORMATION RETAINED FOR

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.

If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 6 months from the closure of the campaign, or if you request us to do so we will retain your information for a longer period.

Information generated throughout the assessment process, for example interview notes, is retained by us for 6 months following the closure of the campaign.

Equal opportunities information is retained for 6 months following the closure of the campaign whether you are successful or not.

HOW WE MAKE DECISIONS ABOUT RECRUITMENT

Final recruitment decisions are made by hiring managers and members of our Human Resources team. All of the information gathered during the application process is taken into account.

You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing recruitment@mikeburton.com.

WORK EXPERIENCE

From time to time we are able to offer opportunities for people to come and work with us to gain work experience. We accept applications from individuals who think they could benefit from working with us.

Applications should be sent directly to us. Once we have considered your application, if we are interested in speaking to you further, we'll contact you using the details you provided.

We might ask you to provide more information about your skills and experience or invite you to an interview.

If we do not have any suitable work at the time, we will let you know but we might ask you if you would like us to retain your application so that we can proactively contact you about possible opportunities in the future. If you say yes, we will keep your application for 6 months.

Also you will be expected to adhere to a confidentiality agreement and code of conduct.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

Your personal information may be shared with other companies in our Group, Mike Burton Travel Limited, Mike Burton Corporate Hospitality Limited or any other subsidiary companies we have from time to time.

We will share your personal information with the following categories of third parties:

▪ Governing Bodies and Event Organisers	▪ Regulatory Bodies
▪ Travel Service and Accommodation Providers Involved in Meeting Your Requirements	▪ Credit and Debit Card Companies
▪ Providers of Third Party Services	▪ Digital Marketing Tools

GOVERNING BODIES AND EVENT ORGANISERS

If you have purchased services from us we will need to give your personal information to the governing bodies or event organisers to provide you with the products and services you requested. This will be dependent on which product and service you purchase but may include: the RFU, Sports Travel and Hospitality Limited, Sports Travel and Hospitality Group Limited, The All England Lawn

Tennis Club, any host unions, organising committees or other providers of hospitality products that we may sell to you. This is primarily for ticket and event management purposes.

TRAVEL SERVICE AND ACCOMMODATION PROVIDERS INVOLVED IN MEETING YOUR REQUIREMENTS

All of the travel and accommodation services in our products and services are provided by third parties. We will pass your personal information to these providers solely for the purpose of providing you with the services which you have purchased. We will need to do this to provide you with the goods and services you have purchased.

If you sign up to marketing communications directly with any travel service or accommodation provider whilst using their services, then their use of your personal information shall be subject to their privacy policies. These are normally accessible on the providers website under 'privacy policy', often found in the footer of the website. If you have provided your consent to them and wish to withdraw, you should contact them directly.

PROVIDERS OF THIRD PARTY SERVICES

We use a variety of third party service providers when delivering our products and services to you. These third parties will include venues, caterers and others (each a "Third Party Provider"). Where an element of the services that you have purchased from us include services delivered by a Third Party Provider we may be required to provide that Third Party Provider with your personal information. We will only pass your personal information to the Third Party Provider to the extent required to provide the services to you and ask them only to act in accordance with this Privacy Policy and or our agreements with them.

TO PROVIDE OUR SERVICES TO YOU

To operate our business we use a variety of systems and services, these include sales management systems, email management and marketing services, booking systems and client management tools. We use these systems so that our business can operate smoothly and efficiently. Where required we will enter your personal information into these systems and services so as to be able to provide you with the services and products that you have purchased and to manage your information as a customer or as someone who wishes to receive marketing communications from us. Some of these systems and services are operated by third parties, who operate them on our behalf and who will act only in accordance with this Privacy Policy and our agreements with them.

CREDIT AND DEBIT CARD COMPANIES

When processing a transaction for the purchase of services we will need to send your personal information to credit and debit card companies as well as our payment processing provider, Secure Trading. In these instances your personal information will only be used to complete the purchase of the services that you have requested from us and/or for the prevention and detection of fraud and crime.

REGULATORY BODIES

We operate within the travel industry and are regulated by ABTA. Should ABTA or any other regulatory body require us to provide your personal information to them for any reason then we shall be obliged to do so. We will only provide them with the personal information that they request for the purposes they require.

DIGITAL MARKETING TOOLS

Facebook Advertising

We use a number of Facebook business services including conversions tracking and custom audiences. You can find more information on how Facebook processes and uses data, and information on settings you can use to protect your privacy by accessing Facebook's privacy policy statement at www.facebook.com/privacy/explanation.

You may refuse to permit Facebook and its partners to place ads and can review and change settings at: www.facebook.com/ads/website_custom_audiences/

Google Analytics and other Google Services

We use a number of Google services including analytics, adwords and tag manager. You can find out more information on these services together with information on Google's data privacy policy at: www.google.com/policies/technologies/ads

Google Analytics

We use Google Analytics to collect information about how users use this site. Google Analytics collects information such as how often users visit this site, what pages they visit and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information.

Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use at: <https://www.google.com/analytics/terms/us.html> and the Google Privacy Policy at <http://www.google.com/policies/privacy/>. You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser.

Google Adwords

Google Adwords Conversion Tracking helps us determine how many people who clicked on our Google Ads end up contacting us through the website. This tracking cookie is set on your browser only when you click on a Google Ad and these cookies help us increase the website's effectiveness for our visitors. These cookies do not contain information that can identify you personally. Please refer to the Google Advertising Privacy Notice for more information about Google Conversion Tracking and the ability to opt out here: <http://www.google.com/ads/preferences/>.

Google AdWords Remarketing

Google AdWords Remarketing helps us to advertise our products and services across the Internet, in particular on the Google Display Network. Google AdWords Remarketing will display ads to you based on what parts of the site you have viewed by placing a cookie on your web browser. This cookie does not in any way identify you or give access to your computer or mobile device. The cookie is used to indicate to other websites that "This person visited a particular page, so show them ads relating to that page." Google AdWords Remarketing allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

These cookies expire within 30 days and do not contain information that can identify you personally. Please refer to the Google Advertising Privacy Notice for more information about Google Conversion Tracking and the ability to opt out here: <https://www.google.com/policies/technologies/ads/>.

Dotmailer

To send our newsletters, e-mails and service messages we use dotmailer's services. More information on dotmailer can be found at <https://www.dotmailer.com/terms/privacy-policy/>. Whilst subscription to our newsletter is voluntary and you can elect not to receive these, we may still use dotmailer to contact you with service emails in order for us to fulfil our contract with you (for example collection of Advanced Passenger Information, or notifying you of a service message).

Our partners and service providers have their own privacy policies and terms of use over which we have no control. Whilst we carefully select these partners, we have no responsibility or liability for their privacy policies, terms of use or the way they process your personal information except as we set out in our agreements with them. Please ensure that you review the relevant privacy policies and terms of use of these partners prior to purchasing their goods or services, using their websites, apps or services or providing any personal information to them.

We may share your personal information with carefully selected third parties, including:

- Our business partners, suppliers, professional advisors and sub-contractors in order to carry out the services under any contract we enter into with them or you;
- Any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006;
- Our site providers who need to see your personal information in order to keep our site up and running; and

- Analytics and search engine providers that assist us in improving your use of our site.

We may disclose your personal information:

- To regulatory and professional bodies and law enforcement authorities;
- If we sell our business in which case the personal information that we hold will be part of the transferred assets; and
- If we are required by law, or in order to enforce or apply our terms of use. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction.

OUR MARKETING

We may provide you with information about products, services, special offers, and other news where we feel these may interest you.

Depending on what contact information you have given to us, we may contact you by email, post or phone. We will only do this where you have consented to receiving such information from us or there is another lawful basis on which we are able to contact you.

We use third party systems and services to assist in sending marketing communications to you. Where we do send you marketing communications using third party systems and services, we will ensure that they only use your personal information for that purpose.

You can opt out of such marketing at any time and if you wish to do so, please email us at marketing@mikeburton.com.

COOKIES AND OTHER TECHNOLOGY ON OUR SITE

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

With regard to each of your visits to our site we will automatically collect the following information:

<i>Technical</i>	<i>About Your Visit</i>
Including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions and operating system and platform	Including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page

WHERE WE STORE YOUR PERSONAL INFORMATION

The personal information that we collect from you may be transferred to, processed and stored outside the European Economic Area (“EEA”). It may also be handled by staff working outside the EEA for us or for one of our suppliers.

We are committed to ensuring that our suppliers have appropriate technical, administrative and physical procedures in place to ensure that your personal information is protected against loss or misuse. All information you provide to us is stored on our secure servers or on secure servers operated by a third party.

Some of the organisations to which we may disclose your personal information are situated outside of the EEA. In order to provide you with the products and services you require, we may need to transfer your personal information to these countries some of which do not have laws that protect privacy rights as extensively as in the United Kingdom. If we do transfer your personal information to other territories, we will take proper steps to ensure that your personal information is protected in accordance with this Privacy Policy.

Unfortunately, the transmission of personal information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our site and any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to try to prevent unauthorised access.

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

We will keep personal information in line with our retention policy.

In summary, personal information used for the purposes of:	
▪ <i>Marketing</i>	shall be retained as long as the relevant consent or basis for processing remains valid or until it is withdrawn, whichever is sooner
▪ <i>Contract</i>	shall be retained for the duration of the contract and for a minimum period of 7 years after
▪ <i>Customer Relationship</i>	shall be retained as long as you remain an active customer of ours
▪ <i>Audit</i>	shall be retained for as long as necessary to demonstrate compliance with all applicable laws and regulations
▪ <i>CCTV footage</i>	shall be retained for 30 days

Personal information will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

ACCESS TO PERSONAL INFORMATION

The General Data Protection Regulation (the GDPR) gives you the right to access personal information held about you. Your right of access can be exercised in accordance with the GDPR.

If you wish to request access to your personal information you may do so by emailing marketing@mikeburton.com or writing to Mike Burton Group, Carter Court, 8 Davy Way, Quedgeley, Gloucester, GL2 2DE. To ensure the security of your personal information we may ask you to verify your identity, including providing identification and other documentation where we deem it necessary.

If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

UPDATING YOUR INFORMATION

You can ask us at any time to change or update the personal information that we hold about you or ask us not to contact you with any further marketing information. You can do this by checking boxes on the forms we use to collect your information or you can also request that we change or amend your personal information by emailing us at marketing@mikeburton.co.uk or writing to Mike Burton Group, Carter Court, 8 Davy Way, Quedgeley, Gloucester, GL2 2DE.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check frequently to see any updates or changes to our Privacy Policy.

ABOUT US

The Mike Burton Group Limited a company registered in England and Wales (01560942) with its registered office at Carter Court, 8 Davy Way, Quedgeley, Gloucester, Gloucestershire GL2 2DE operates <https://www.mikeburton.com/>.

For the purpose of the GDPR, the data controller is Mike Burton Group Limited, data protection register number: Z7319098.

CONTACT

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to Mike Burton Group, Carter Court, 8 Davey Way, Quedgeley, Gloucester, GL2 2DE or marketing@mikeburton.com.