

# Kaakiri Limited Privacy Policy

In this document “we” or “us” means Kaakiri Limited registered number 13738838 registered at 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

Kaakiri Limited is committed to respecting your privacy and protecting your personal information. This privacy notice sets out:

- I. When we collect personal information about you
- II. How we collect and hold the personal information
- III. The types of personal data we collect and why we collect it
- IV. Our legal basis for using your personal information
- V. How do we keep your personal information safe?
- VI. Data Retention
- VII. Your rights and choices about the personal information that we hold.

This privacy notice has been updated to reflect GDPR (the General Data Protection Regulation) May 2018.

## **1. When we collect personal information about you**

We collect personal information about you whenever you make a booking or otherwise interact with in person or via telephone, our websites, email or other contact methods

The kinds of personal information Kaakiri Limited collects from you or about you depends on the transaction you have entered into with us.

The kinds of personal information that we commonly collect and hold from you or about you includes: your name, address, phone and email address, and in the case of booking of travel or accommodation: date of birth, driver’s license details or passport details and details of your employment, and (where applicable) bank account details and credit card details.

When you contact us via a request through our website, we record your name and the contact details you have given to us in that request.

## **2. How we collect and hold personal information**

We aim to collect personal information directly from you, unless it is unreasonable or impracticable for us to do so. For example, we collect personal information from you or about you from letters, emails, faxes, application forms and contracts that you submit to us and telephone calls with us.

In some instances we may receive personal information about you from third parties, such as your employer, airlines, wholesale travel booking providers, embassies, consulates, accommodation providers, car hire companies, our associated businesses, allied agencies, suppliers, merchants and referrers.

You can be anonymous or use a pseudonym when dealing with us, unless:

- the use of your true identity is a legal requirement; or
- it is impracticable for us to deal with you on such basis.

Please note that it is not possible for you to be anonymous or to use a pseudonym if you wish us to book travel or accommodation arrangements for you.

We also collect certain information where you visit or browse our website including through the use of cookies. You will be asked to approve the use of Cookies.

### **3. The types of personal data we collect and why we collect it**

We collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities. For example, we collect, hold, use and disclose your personal information as necessary to book travel or accommodation services.

Our business involves making booking arrangements with third parties for travel and accommodation services, such as airlines, other transport providers and accommodation providers. We routinely disclose your personal information to these third parties for them to assist us in carrying out our business functions and activities. We will disclose your personal information to banking institutions (to verify and process your payments).

If we do not collect, hold, use or disclose your personal information, or if you do not consent, then we may not be able to answer your enquiry, complete the transaction you have entered into or your organisation has contracted us to provide.

We also collect, hold, use and disclose your personal information for related purposes that you would reasonably expect, such as our administrative and accounting functions, fraud and identity checks, providing you with information about other products offered by us, marketing and promotions, market research, newsletter communications, feedback surveys and questionnaires, market research, statistical collation, social and media analysis and website traffic analysis.

When you book or register with us we will ask if you would like to receive marketing communications. If you have previously agreed to receive marketing communications we may send you relevant offers and news about our products.

You can change your marketing preferences by contacting us in any way or by using the 'unsubscribe' link in our marketing emails or by replying STOP to our marketing text messages.

We will respect your choice as to what communications you wish to receive and the methods by which you are sent them.

Where we wish to use or disclose your personal information for other purposes, we will obtain your consent.

Where we use your personal information for marketing and promotional communications, you can opt out at any time by notifying us. Opt out procedures are also included in our marketing communications.

We may also disclose your personal information to third parties (including government departments and enforcement bodies) where required or permitted by law.

With regulatory authorities - it may be necessary to disclose personal data for immigration, border control, security and anti-terrorism purposes, or any other purposes required by regulatory authorities.

It is often necessary for us to send your personal information outside the European Economic Area to fulfil your travel arrangements. This is because the suppliers providing your travel services are located around the world. Also your personal information may need to be transferred to border control and immigration outside of the EEA. This may involve sending your data to countries where under their local laws you may have fewer legal rights.

We do not sell your personal information to other parties for their use in their or others' promotional activities

#### **4. Our legal basis for using your personal information**

We will only process your personal information where we have a legal basis to do so. Depending on the circumstances, the legal basis will almost always be one or more of the following:

- so that we can make and fulfil your booking or otherwise perform our contract with you;
- because it is in our legitimate interests to use your personal information to operate and improve our business as a travel agency;
- comply with a legal obligation;
- to protect the vital interests of you or another person; or
- because you have consented to our using your information for a particular purpose.

#### **5. How do we keep your personal information safe?**

Protecting the confidentiality and integrity of your personal data is a responsibility that we take seriously at all times. We use appropriate technical and organisational measures to help to keep personal data secure against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

#### **6. Data retention**

We will keep your personal data for only as long as it is necessary for the purposes set out in this privacy notice. For example, after travel we will keep the information related to your booking so that we can respond to any complaints and fulfil our record keeping obligations. After this time, we will securely erase or anonymise personal data.

#### **7. Your rights and choices about the personal information that we hold**

You can ask us for a copy of the information that we hold about you.

You can also ask us to correct any information which you don't think is correct or to

delete the information we hold about you.

To comply with these requests we may need you to confirm your identity by providing documents or additional information.

You have the right to lodge a complaint about how we have handled your personal information with the Information Commissioner's Office (ICO).

**Contact us**

20. Our address is: Data Protection Kaakiri Limited registered number 13738838, 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ

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