



# Ladybird Travel Limited Privacy Policy

## Introduction:

Deciding to purchase a holiday in person, by phone or over the internet requires trust that your chosen travel agent is acting in your best interests – a relationship that requires trust that the agent will fulfil your wishes, whilst protecting you, your rights and your personal information every step of the way

At Ladybird Travel Limited, your right to privacy is at the forefront of everything we do which is why we are transparent on why we collect certain personal data, retain it and most importantly, protect it. This Privacy Policy explains how we respectfully collect, use, and share your personal data when you use our services, including those provided through Ladybird Travel Limited. Our promise to each and every customer and/or potential customer is simple:

We promise to:

- Never sell your data
- Keep your data safe, private and secure.

## Who We Are:

Ladybird Travel Limited is registered in England under registration number 16277308 with the registered office being Unit 3 Adswood Industrial Estate, Adswood Road, Stockport, SK3 8LF. Ladybird Travel Limited trades from Regal Buildings, 2B Marsland Road, Sale Moor, Cheshire, M33 3HQ.

The assigned Data Protection Officers (DPO) are Sam Nickson, Adam Cowell and Katie Smith.

Any enquiries regarding our handling/protection of data should be directed by email to [accounts@ladybirdtravel.co.uk](mailto:accounts@ladybirdtravel.co.uk) and addressed 'For the Attention of the DPO's'.

Ladybird Travel is a registered company with the Information Commissioner's Office, UK and follow the guidelines published by the ICO. This includes gathering and processing data in accordance with the prevailing data protection legislation, including the United Kingdom and European Union General Data Protection Regulation (GDPR) and the Data Protection Act 2018

## Information We May Collect About You:

Personal data or personal information means data/information where an individual can be identified from it. It does not include data where the identity has been removed (anonymous data).

So that we can help you, we may collect the following data/information from you:

<b>Identity Data:</b>	<ul style="list-style-type: none"><li>• Title</li><li>• First and last name</li><li>• Maiden name or previous names</li><li>• Marital status</li><li>• Gender</li><li>• Date of Birth</li><li>• Passport number and expiration date</li><li>• Nationality</li><li>• Next of Kin</li><li>• Dependents</li><li>• Co-travellers</li></ul>
<b>Contact Data</b>	<ul style="list-style-type: none"><li>• Billing address</li><li>• Registered home address</li></ul>

	<ul style="list-style-type: none"> <li>• Telephone numbers including home and/or mobile</li> <li>• Email address</li> <li>• Emergency contact name(s) and contact details</li> <li>• Preferred method of contact</li> </ul>
<b>Financial Data</b>	<ul style="list-style-type: none"> <li>• Bank details</li> <li>• Card payment details</li> </ul>
<b>Transaction Data</b>	<ul style="list-style-type: none"> <li>• Previous purchase details, travel arrangements and quotes</li> <li>• Previous contact history</li> <li>• Previous payments and any associated credits/refunds</li> <li>• Claims history</li> <li>• Communication history</li> </ul>
<b>Technical Data</b>	<ul style="list-style-type: none"> <li>• IP address(es)</li> <li>• Browser type and version</li> <li>• Time zone settings and location</li> <li>• Browser plugin types and versions</li> <li>• Operating systems and platforms</li> <li>• Other technology on the devices you use to access our website</li> </ul>
<b>Profile Data</b>	<ul style="list-style-type: none"> <li>• Username</li> <li>• Password</li> <li>• Unique ID's</li> <li>• Policy number</li> <li>• Quote number</li> <li>• Claim number</li> <li>• Passport and visa documents</li> <li>• Preferences</li> <li>• Interests</li> <li>• Feedback and survey responses</li> </ul>
<b>Usage Data</b>	<ul style="list-style-type: none"> <li>• Information on how you use our website</li> </ul>
<b>Marketing and Communications Data</b>	<ul style="list-style-type: none"> <li>• Preferences on how you would like to receive marketing from us e.g post/email</li> <li>• Communication preferences</li> </ul>
<b>Image Data</b>	<ul style="list-style-type: none"> <li>• Photographs</li> <li>• CCTV footage</li> <li>• Webcam footage</li> </ul>
<b>Aggregated Data</b>	<ul style="list-style-type: none"> <li>• Statistical or demographic data. (This is not classed as personal data as it does not directly or indirectly reveal your identity unless it is combined with your personal data)</li> </ul>
<b>Special Category Data</b>	<ul style="list-style-type: none"> <li>• Religious beliefs</li> <li>• Ethnicity</li> <li>• Sexual Orientation</li> <li>• Political views</li> <li>• Dietary preferences and requirements</li> <li>• Criminal convictions</li> </ul>



	<ul style="list-style-type: none"> <li>• Health data</li> </ul> <p>Special category data is only collected when it is relevant to the product or service you are enquiring about or purchasing. We do not intentionally collect it. If you choose to voluntarily provide Ladybird Travel Limited with any special category data, we will treat your data with the same care, respect and applicable legal safeguarding in line with the rest of your personal data as laid out in this policy.</p>
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### How We Collect Your Information:

- When you talk to us face-to-face in our Travel Agency
- When you talk to on the phone
- When you complete an online registration form on our website
- Complete a form corresponding with us by post, email or phone
- Complete an application form
- Take part in competitions and surveys via:
  - Online website
  - In the shop
  - Via social media platforms
  - Over the phone
- Complete feedback form
- Create an account on our website
- Apply/Purchase one of our products or services
- Subscribe to our services or publications
- Request marketing is sent to you
- Interact with our website – technical data about your web browsing actions, patterns and equipment is collected by the use of cookies, server logs and similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our Cookie Policy for more details.
- Third parties or publicly available sources. We will receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - analytics providers such as Decibel Insight, Google based outside the UK;
    - advertising networks based inside OR outside the UK; and
    - search information providers based inside OR outside the UK].
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as price comparison websites for insurance products.
  - Identity and Contact Data from data brokers or aggregators for marketing purposes.
  - Identity and Contact Data from publicly available sources [such as Companies House and the Electoral Register based inside the UK] Including data from credit reference agencies
- Databases including, but not limited to, the Motor Insurer's Bureau (MIB), the Claims Underwriting Exchange (CUE), Motor Insurance Anti-Fraud Theft Register (MIAFTR) and the Insurance Fraud Bureau (IFB) for detection of financial crime and fraud.
- Government agencies and regulatory bodies including the police and the Driver and Vehicle Licensing Agency (DVLA)

### How Do We Use Your Data?



We will only use your personal data in accordance with the law. In the main, we will use your data for the following reasons:

- To undertake and facilitate your request to purchase a product or service in line with the contract we are about to or have entered into with you.
- Where we need to comply with a legal obligation
- Where it is necessary to protect your vital interests or those of another individual
- To communicate with you about products or services that you may find useful and you have consented to contact you via your preferred method.
- To contact you about changes to our services

### Sharing Your Information:

We do not sell, trade or rent your personal information to others. We will never disclose our personal data to third parties except in the following circumstances:

- To fulfil your specific order as part of the contract (or proposed contract), if it is delivered by a third party. Data disclosed to them will only be for the administration of the product, service or information provided. This could include (but is not limited to), verification of any quote given to you, claims processing, underwriting, pricing purposes as appropriate, testing, and to maintain management information for business analysis. For example, if you go on a holiday with us, the hotel needs to know who you are. If you take out an insurance policy provided by a third party, they will need your details to administer the policy, verify the quote given to you and process any claims. For further details about how your insurer handles your information, please see their Privacy Policy which can be found on their website. See your policy schedule documentation for your insurer contact details;
- Where third parties administer part or all the product or service. An example of this is where you book a travel product with us under Civil Aviation Authority (CAA) rules we have to place any funds paid to us into a trust administered by Travel Trust Trustees UK Ltd.
- For underwriting, pricing, insurance rating analysis and testing purposes, and to maintain management information for business analysis;
- For tailoring adverts you see when you are online. These might be on our Ladybird Travel Limited website, social media sites such as Facebook, search results, or other sites that sell advertising space;
- For marketing purposes, where we have a legal basis for doing so;
- Where we have engaged a third party to carry out market research on our behalf and who may contact you for the purpose of obtaining feedback about the products and services that we offer;
- Where we have your consent to do so.
- We may be obliged by law to pass on your information to the police or any other statutory or regulatory authority. In some cases, exemptions may apply under relevant data protection legislation, whereby we can legitimately release personal data e.g. to prevent or detect crime or in connection with legal proceedings.
- Payment processors/Merchant processors to securely handle financial transactions
- IT service providers to manage our systems

### ***Information sent outside the UK and European Economic Area (EEA)***

We provide products and services including holidays and cruises outside the European Economic Area (EEA) and to some countries that are not Whitelisted countries. Therefore, if you travel on such holidays, the information you provide may occasionally be transferred outside of the EEA, where from time to time, we work with suppliers and service providers that are either based outside of the EEA or have servers based outside of the EEA. Countries outside of the EEA protect information differently, and so where we do transfer your information to suppliers based outside of the EEA, we will take all



steps necessary to ensure that it is adequately protected and used in accordance with this Privacy Policy, including but not limited to relying on any appropriate cross-border transfer solutions such as European Commission's Standard Contractual Clauses or International Data Transfer Agreements (IDTAs) approved by the UK Information Commissioner's Office or may require the other party to be signed up to government standards that are recognised as providing the right level of protection.

### Data Retention:

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Data is kept for a period of up to 6 years and any telephone recordings are usually stored for up to 12 months. We may keep your data for longer than 6 years if we cannot delete it for legal, regulatory or technical reasons.

In some circumstances we will 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.

### Your Rights:

We follow the guidelines published by the Information Commissioner's Office and if you require a copy of the data that we hold related to your name, please contact us on [accounts@ladybirdtravel.co.uk](mailto:accounts@ladybirdtravel.co.uk)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to:

**Request access/information** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or



remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate\* interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it. You can withdraw your consent at any times. Please contact us via email on [sales@ladybordtravel.co.uk](mailto:sales@ladybordtravel.co.uk) to do so or click 'Unsubscribe' on our emails otherwise we will continue to communicate with you regarding existing travel bookings or relevant future offers that we believe will be in your both legitimate\* interest and ours.

*\*(A legitimate interest is defined as when we have a business or commercial reason to use your information providing it does not unfairly go against what is right and best for you.)*

### Changes to the Privacy Policy:

**This Privacy Policy was last updated in May 2025.**

Any future changes we may make to our privacy policy will be posted on this page. Where we make significant changes to the policy, we will notify you via email.

