

## Privacy Policy



## HILLGATE TRAVEL

This document has been designed using the guidance procedures provided by the Information Commissioners Office (ICO) and in relation to the statutory requirements with regards our obligations to the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). For information purposes, Hillgate Travel is registered as a data controller with the ICO under registration number Z1602111.

We are committed to safeguarding the privacy of our customers, be it through direct communication or via our public website and customer travel portal (GateWay). Hillgate is committed to upholding the eight recognised Data Protection Principles. Any and all data submitted to Hillgate will be held in accordance with the 1998 Data Protection Act and held in secure domains at all times.

Our principal form of business is business travel management alongside meetings and events management for contracted corporate customers. We also offer VIP, Leisure and Concierge services for private individuals and their families. Our registered office address is Stephenson House, 75 Hampstead Road, London NW1 2PL and is the address to which all formal communication should be addressed. Our website address is [www.hillgatetravel.com](http://www.hillgatetravel.com). Our main contact number is 020 7753 8811 and our CEO is Anthony Rissbrook to all formal communication and relevant enquiries should be addressed.

## DATA PROVIDED VIA CONTRACTUAL CLIENT RELATIONSHIPS

In all our contractual client dealings, it is explicitly stated that It is the responsibility of the client to seek authorisation for Hillgate to use the personal data to fulfil its obligations in respect of the scope of works and unless otherwise instructed, Hillgate will assume this permission has been sought and given if an authorised travel request is received.

Hillgate will only ever transfer minimal client data to any location - in accordance with Data Protection Principle 2 ("Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes"). Furthermore, Hillgate warrants to The Client (and its employees submitting personal data) that it shall:

- a) only process Personal data in accordance with The Client's instructions and to fulfil our obligations in respect of the scope of works of any agreement and make no other use of it without express permission.
- b) take appropriate technical and organisational measures against unauthorised or unlawful processing of The Client's Personal data and against accidental loss or destruction of, or damage to, Personal data as necessary to enable it to process the Personal data in

compliance with obligations equivalent to those imposed on a Data Controller by the Seventh Principle of the Act.

- c) not do or permit anything to be done through act or omission which would cause The Client to incur any liability under the Act or any other applicable data protection laws and regulations (or any legislation or regulations from time to time amending or replacing the same), including without limitation all laws intended to implement the Data Protection Directive (95/46/EC) (referred to as "data protection laws")

Furthermore, Hillgate agrees that, outside of the tools used to fulfil the services contracted with us, it shall not engage any third party to process of The Client's Personal data unless The Client has provided express written consent AND

- a) the third party selected has provided sufficient guarantees in respect of the technical and organisational measures governing the processing to be carried out, and
- b) the third party has entered into a written contract with Hillgate which imposes on the third party obligations identical to those imposed on Hillgate under the data protection clauses within any given agreement

Each contractual client acknowledges and agrees from the outset that in order to fulfil the services within any given agreement, it is impossible to ensure that data is wholly stored within the EEA or any single geographical designated area as there is a regulatory requirement to submit information to the Principal in order to fulfil travel booking requirements. Each client also agrees that the Hillgate GDS operating system - Sabre Travel Network (Sabre GLOB Inc.) - requires data storage in the USA. (Sabre GLOB Inc. has entered into EU Standard model clauses with and between Sabre UK Marketing Limited - the entity which provides access to the Sabre Travel Network for Hillgate - to provide the required legal basis for the transfer of Personal data outside the European Economic Area.)

Hillgate shall not transfer personal information or data outside the European Economic Area without The Client's prior written consent unless Hillgate and the recipients of such personal data have entered into the standard contractual clauses (in relation to controller-to-processor transfers) annexed to the Commission Decision of February 2010 on standard contractual clauses for transfer of personal data to processors established in third countries (2010/87/EU).

Hillgate has and will continue to take all reasonable steps, in accordance with all relevant legal responsibilities, to ensure the reliability of any of its employees which will have access to the personal data of The Client. If Hillgate receives any complaint, notice, request (including any subject access request) or communication which relates directly or indirectly to the processing of the Personal Data or to either party's compliance with Data Protection Laws, we shall immediately notify The Client (deemed to be acting thereafter on behalf of its employee) in

writing and Hillgate shall provide The Client with all reasonable assistance in relation to the same.

## DATA RETENTION POLICY GUIDING PRINCIPLES

### Information Held

Hillgate Travel has and maintains two registers of data held.

- The first covers data we hold in order to conduct our business i.e. that of our customers. It is held in the following document: "GDPR Register External - Hillgate Travel vxx.docx"
- The second covers employee data. This is held in an excel document that is entitled "GDPR Register Internal - Hillgate Travel vxx.docx"

These documents are updated at least once a year as will testify the revision history. The owner of these documents is the Chief Information Officer (CIO) who is also acting Data Protection Officer (DPO).

### Information Collected

Hillgate Travel may collect, store and use the following kinds of personal data:

- a) information about your computer and about your visits to and use of our services including our website and client facing technology
- b) information relating to any transactions carried out in order us to fulfil requests in association with our defined scope of works
- c) information that you provide to us for the purpose of registering your personal profile and for access to our technology
- d) any other information that you choose to send to us which is pertinent to the scope of works for which we are contracted or for the fulfilment of personal travel requests - this information may extend in this instance to family members

### Cookies

We reserve the right to use cookies on our main website. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. All internet browsers allow you to refuse to accept cookies but restricting our access may have a negative impact upon the usability of many websites.

### Disclosures

In addition to the disclosures outlined within this policy we may disclose information about you:

- a) to the extent that we are required to do so by law
- b) in connection with any legal proceedings or prospective legal proceedings
- c) in order to establish, exercise or defend our legal rights - including providing information to others for the purposes of fraud prevention and reducing credit risk

## INDIVIDUAL RIGHTS

### The right to be informed

For corporate customers; all information about processing of data is provided in the terms of the contract or formal trading agreement which they receive, review and sign. Additionally, the basis of processing and all details are provided on the ICO (Information Commissioner's Office) website.

### The right of access and rectification

Hillgate Travel is a Data Processor and process data for the purposes of providing its services (Business Travel). The Data is controlled by the customer. Our principal form of business is business travel management alongside meetings and events management for contracted corporate customers. We also offer VIP, Leisure and Concierge services for private individuals and their families.

For Corporate Entities, the employee likely to request this must speak to their nominated travel manager - or person responsible for managing the contractual arrangement - and obtain consent to rectify the information if this is provided directly from their HR system via a frequently updated "feed". As employees of business customers with whom we have a contractual commitment, we have received an assurance that the company has sought and received permission of all individual employees they authorize to travel on business to share their personal data with us.

Employees can view the held personal data via a secure log-in to the Gateway Profile Tool using a bespoke user name and registered company email address at [www.hillgatetravel.com](http://www.hillgatetravel.com). Employees are entitled to maintain and change this data as they wish as long as it is legally correct i.e. matches passports etc.. Employees must also be aware that the next time they travel on company business, this data will be required to be recollected and complete and so they may have to reprocess a delete request after each subsequent business trip.

VIP customers can have their data changed by addressing their VIP contact directly. This will be changed on their behalf per their request. All these requests however should ideally be provided in writing so an audit trail exists. If the customer is not willing to put it in writing, the VIP agent will document the change by sending to the VIP group box email documenting the request, time and manner (person, call).

### The right to erasure

For Corporate Entities erasure typically happens in the following situations:

- "Customer" provides an electronic feed with the instruction to "delete" the employee

- “Customer” lead contact provides written instruction to a Hillgate Key Account Manager or Team leader to delete an employee’s data
- All Customer employees get deleted once the customer has left Hillgate as per the data retention policy. (Data Retention Policy Document available upon request)
- For VIP customers, a request should be addressed via email to the VIP group for them to action within statutory timelines.

### **The right to restrict processing**

For Corporate Entities: Hillgate Travel is an “agent” of the customer and therefore will have gathered all necessary permissions prior to contract commencement and provision of their employee data. Any objection to processing data needs to be raised with the contractors contact – typically the travel manager or nominated contact - who will liaise with their local HR. The right to restriction does need to meet the GDPR requirements and this will be assessed as part of that companies plan to comply with regulation. If Hillgate customers i.e. the business entity and not the traveller, has established that processing should be restricted, the profile will be either deleted or “frozen” such that no more travel can be booked for that individual.

For VIPs, Hillgate will accept a written request to restrict processing i.e. to no longer book travel for said individual. In any case where the VIP does not want to send the request in writing, the agent who receives the instruction will email the team box (VIP) and cc: the VIP to acknowledge and effectively document the request. Profiles in Sabre (Third-party GDS) will be disabled.

### **The right to data portability**

For Corporate Entities: individual requests from travelers will not be accepted. The customer is the corporate contracted entity. Today, all existing customers can have access to all transaction data via the MiWay Analytics reporting suite and are entitled to export it in the standard flat-file XLS/CSV format provided. All Profile data will be deleted after a customer has transitioned to a new TMC (Travel Management Company).

Prior to that, and typically as part of a hand-over, profiles can be sent over secure means. There are however exceptions such as credit card details as well as passport details unless explicit permission and indemnification for any subsequent data loss or quality is provided.

VIP customers will typically not wish to transport data however if such a request were formulated, the IT department would acquiesce within 30 days.

### **The right not to be subject to automated decision-making**

At time of creation of this document, Hillgate Travel does not utilize automated decision making in any of its processes. Should this change, Hillgate Travel will always provide an opt-out capability and will also review any objections within the framework provided in GDPR.

## **SUBJECT ACCESS REQUESTS**

These need to come through the contracted customer i.e. the corporate entity versus a traveller. This should be in writing and preferably electronically i.e. email or scan of PDF request. In the interim, a traveller has access to all data stored or used inside GateWay. This can be screenshot if they need to capture it. If another format is requested, then this will be dealt with within 30 days of receipt in a meaningful format dictated by Hillgate Travel.

## **DATA BREACHES**

Hillgate Travel is ISO 27001 & PCI-DSS compliant and has a documented incident management process. More details are available in the ISO 27001 ISMS (Information Management System) upon request. Guidance on when and how to report a data breach are documented by the ICO - Hillgate Travel is committed and capable of meeting these.

## **DATA PROTECTION BY DESIGN**

Hillgate Travel is PCI-DSS certified and ISO 27001 Certified. Both of these standards provide best practice for data protection. More details are available for each in their respective documentation locations.

## **THIRD-PARTY WEBSITES**

We are not responsible for the privacy policies or practices of third party websites which may be entered directly from within our various client facing technologies.

## **POLICY AMENDMENTS**

We reserve the right to update this privacy policy from time-to-time and will post the most up-to-date version on our website at any given time without announcement.



Anthony Rissbrook  
Chief Executive Officer  
Hillgate Travel  
October 1<sup>st</sup> 2017