

Avenue Six Limited Privacy Notice

About this document

This document explains the data we hold, how we hold data, how we handle data, who we hold data for and how we will act in the event of that data is compromised.

The notice deals with how we use your data in relation to:

- The business relationship between us.
- Enabling you to use our services.
- Sharing information about Avenue Six.
- Working with directors and staff at Avenue Six.
- Working with third party systems and channel managers.
- Working with third party travel agents and tour operators.

We recognise our obligations under data protection legislation, and we are strongly committed to keeping your data safe and secure.

You should read this notice so that you understand how we will handle your data. Our aim is to only use and hold your data in the way you'd reasonably expect us to. We reserve the right to amend this privacy notice from time to time. Where we do amend this notice, we will make sure that we will tell you about the changes we've made.

About Avenue Six

We are Avenue 6 Limited:

Registered office: 14 Lancaster Street, Newcastle upon Tyne, NE4 6EU

Registration number with the Information Commissioner's Office: ZA759432

Our data officer is James Barber, technical and design director at Avenue Six.

We publish the following contact details so that people can get in touch with us about our data and privacy policies.

E: hello@avenue6.travel

Address: Avenue Six Data Protection Representative, 14 Lancaster Street, Newcastle upon Tyne, NE4 6EU.

The data we gather

We gather some or all of the following information from our trade partners and our supplier partners.

- Contact details
- IP address and cookies. Please refer to our website privacy policy for more details.
- Business information, including address, business description, facilities, prices/room rates, opening times, photos, and other information, most of which is already in the public domain.
- Business information for the purposes of financial processing and invoicing, including bank account details, address contact details, company number and VAT number, as applicable.
- Records of correspondence.

- Details of transactions and of the fulfilment of orders.
- Survey information, where we ask partners to complete surveys that we use for the purposes of research and evaluation, including business needs assessment.
- Data required to process bookings and payments made via the third-party systems.

How we collect data

We collect data from the following sources: -

- Information that trade partners and suppliers provide to Avenue Six in person, in writing, over the phone or by email.
- Information trade partners and suppliers provide via our website and platform including where you enter details via an online form, or more generally by visiting our websites.
- Information trade partners and suppliers provide to third party system suppliers involved with Avenue Six.
- Information trade partners and suppliers provide to third party travel agents or tour operators involved with Avenue Six.
- Information trade partners and suppliers provide for research purposes, such as surveys and business needs assessments, only obtained with your informed consent.

How we store data and keep it secure

We use up to date security methods to keep data secure and to prevent unauthorised or unlawful access data, and against the accidental loss of, or damage to, data. All information is stored on secure servers and in secure filing systems. Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of data.

We have in place policies, procedures and technologies to maintain the security of all data from the point of collection to the point of destruction including procedures to deal with a security breach. We ensure your data is only accessible by those who need to see data for their specific role and keep it confidential. We only transfer data to a third party if that third party agrees to comply with those procedures and policies, or if they put in place adequate technical and organisational measures themselves.

Systems we use to store data

Supplier and trade partners data is entered and stored on an online CRM system supplied by <https://www.reallysimplesystems.com/about-us/contact/>

Data about trade partners who have log in access to our trade portal is stored on or portal which is held on an AWS server managed by Avenue Six.

Data in the form of information sheets for our supplier partners is held on an external hard drive that is detached from desktop computers when not in use.

How and why we use data

We only process your data where a trade or supplier partner has given their consent or where the processing is necessary:

- For the purposes of an agreement between us and a supplier or trade partner;
- To comply with contractual and legal obligations;

- To comply with our terms and condition of business;
- To ensure effective delivery of Avenue Six services;
- For the purpose of promoting Avenue Six and its partners, both domestically and internationally via our trade partners, channel managers and distribution suppliers, including via their websites and booking platforms.
- To deliver information about Avenue Six activity
- To facilitate B2B transactions;
- To pursue our legitimate interests, such as operating our business effectively.

We sometimes process data on the basis of legitimate interests. Most of the work carried out by Avenue Six is done on the basis of legitimate interest. Partners have a right to object to this processing.

For the purposes of Avenue Six we hold information supplied by trade and supplier partners, along with all data required to process bookings and payments made via the third-party systems. None of the data is to facilitate marketing, and in the majority of cases the information is business information and is not personally identifiable. No one outside Avenue Six or the relevant supplier with legitimate interest has access to your data.

How we keep data accurate

We keep the data we store accurate and up to date. We take every reasonable step to erase or rectify inaccurate data without delay. We contact all our suppliers at least once a year to update the data we hold about them.

How long do we keep data?

We keep your data only as long as it is necessary for the purpose(s) for which we process it. This means that data is destroyed or erased from our systems when it is no longer required.

Information about bookings made via third party systems are held by Avenue Six on average for a period of 36 months (3 years).

The rights of Avenue Six trade and supplier partners in respect of their data?

- Request access to any data we hold. Before we agree to change data, we ask for sufficient evidence of your identity and sufficient details of the information the partners wish to see so that we can locate and provide it;
- Ask us to remove partners from our contacts or project communication lists, or to have some or all of their data erased from our systems.
- Correct any errors in information we hold, to change or correct any details already given to us, or to complete data which is incomplete;
- Have the processing of data restricted;
- Be provided with any data that has been supplied, in a portable format that can be transmitted to another data controller without difficulty;
- Object to certain types of processing, including processing based on legitimate interests (see above);
- Not be subject to a decision that is based solely on automated processing which produces a legal effect, or which has a similar significant effect.

If you object to us processing your data based on legitimate interests, we must no longer process that data unless we can demonstrate compelling legitimate grounds for the

processing which override your interests, rights and freedoms or that the processing is required for the establishment, exercise or defence of legal claims.

More information about legitimate interest is provided online at: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/legitimate-interests/>

If you wish to exercise the right set out above, you must make the request via email to hello@avenue6.travel. Please note some of these rights are restricted in some circumstances.

Who has access to the data held by Avenue Six?

Directors, employees at Avenue Six and contractors who need to access to data in order that we can effectively administer and provide information and services to our trade and supplier partners. All of our employees and contractors understand the need use information in accordance with the legitimate interests of the company.

In addition to our employees, we use service providers who will hold data on our behalf, including system suppliers, tour operators and travel agents (see above for details).

Avenue Six does not hold or transmit any personal or business data that is held in any agent booking tools: the API for tours and attractions (Provided by Bokun and Trekksoft), the Avenue Six Extranet (Provided by Solutions) or the central reservation system for accommodation businesses (Provided by Hotel Spider). Data held by these tools and companies is subject to contract and data protection agreement between those companies and individual businesses who have signed up to the project.

- Business information from tours, attractions, and food and drink businesses is held by: Bokun, Nóatún 17, 105 Reykjavík, Iceland or Trekksoft, Hauptstrabe 15, 3800 Matten b. Interlaken, Schweiz, Switzerland
- Business information from hotels and accommodation providers is held by: Hotel Spider, Tourisoft Sàrl Route de Champ-Colin 18 CH-1260 Nyon, Switzerland

Avenue Six carries out due diligence on our service providers and make sure we have a contract with them which satisfies the requirements of data protection legislation. Apart from employees and our service providers, we do not disclose data to a third party without consent, unless we are satisfied that they are legally entitled to the data. Where we disclose data to a third party, we have regard to our obligations under the law.

We may disclose information to third parties:

- If we or substantially all of our assets are bought by a third party, or we wish to enter negotiations in respect of the sale of our business or assets to a third party. Where this is the case, data held by us may be one of the transferred assets; and
- If we are under a duty to disclose or share your data in order to comply with legal obligations or to protect the rights, property, or safety of Avenue 6 Limited, our customers, suppliers or other employees. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

You are entitled to request details of the recipients of your data or the categories of recipients of your data.

Transferring your data outside the European Economic Area (EEA)

We will not transfer your data outside the EEA unless such transfer is compliant with the law. This means that we cannot transfer any Personal Data outside the EEA unless:

- The EU Commission has decided that the country or international organisation we are transferring the Personal Data to ensures an adequate level of protection for your Personal Data.
- The transfer of your Personal Data is subject to appropriate safeguards, which may include binding corporate rules or standard data protection clauses adopted by the EU Commission; or
- We are otherwise permitted to do so by law (including if you explicitly consent to the proposed transfer).
- Bokun, the company providing booking API for tours and attractions is registered in Iceland. Treksoft providing booking API for tours and attractions is registered in Switzerland. Hotel Spider - Tourisoft, the company providing CRS system for accommodation bookings is registered in Switzerland. Both jurisdictions are members of the EEA.

Data breaches

In the event of a data breach, either of data held by Avenue Six Limited or any of our agent booking tools we use the following process to protect data and inform our partners:

- Identify the type of breach and the data that has been compromised.
- If required notify the Information Commissions Office of the data breach.
- Inform partners whose data may have been compromised, stating the date of the breach, the type of breach and the data that may have been compromised so that they can take any necessary steps
- Review the systems and protections we have in place to identify how the breach has occurred.
- Take steps to ensure that the breach does not occur again.
- Regularly review the protections in place for all systems that we subscribe to ensure they are, to the best of our knowledge, compliant with data protection law and have necessary data protection measures in place.

Right to make a complaint

Any complaints about our handling of personal information should be emailed to our data protection officer: hello@avenue6.travel. If your complaint relates to the handling of information by an organisation with which we share information, then please let us know. We aim to respond to your complaint within 20 days of receiving it. You have a right of appeal in relation to any decision we make, which we will tell you about when we respond to your complaint. We will always review our policy and procedure in line with any justified complaints.

If you are not happy with the way we handle your complaint or you have any issues with our processing of your data and would like to make a complaint, you may contact the Information Commissioner's Office on 0303 123 1113 or at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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