

Security and Privacy Policy

Introduction

Boundless Breaks and all websites and brochures operated and/or produced in relation to it are owned and maintained by Boundless by CSMA (“we”, “us”, “Boundless” and “Boundless Breaks”), a trading name of Motoring & Leisure Services Limited, a subsidiary of the Civil Service Association Limited.

We are committed to keeping your personal details safe. This privacy notice sets out the way we process your information and details our privacy and fair processing policy. We will always refer to this page when we ask you for your consent. We’ll keep this page updated to show you all the things we do with your personal information so that you can be confident when sharing your information with us that it will be only used for what we say here.

We take security issues seriously. We have implemented appropriate steps to help maintain the security of our information systems and processes and prevent the accidental destruction, loss or unauthorised disclosure of the information we collect.

This privacy notice applies to individuals using Boundless Breaks who are not Boundless members. Boundless members should refer to the privacy policy on the Boundless web-site or in our current Boundless literature.

How we use personal information

What information do we collect about you?

If you choose to make a booking with us we will collect details that you provide in relation to that booking. Information held is likely to include your name, date of birth, contact details, bank account details, information about people you are travelling with, information about your booking and any additional information we may need to meet personal and specific booking requirements. We also collect website usage information. We do this using “cookies”. For further information about cookies and how we use them please see our Cookies Policy.

How do we use your information?

We will use the personal information you have shared with us for the following:

- To enable us to complete your booking.
- To confirm identification when you contact us.
- To manage customer service queries.
- To monitor our customer service to you.
- To comply with legal and regulatory requirements
- To ensure all marketing communications you receive from us are relevant, such as tailoring messaging based on personal data provided by you.
- To keep you informed of any special offers or promotions about Boundless and Boundless Breaks, that we believe might be of interest to you in accordance with your preferences.
- For statistical analysis, research and to track activity on our website.
- To help detect and deal with crime and unsavoury behaviour.

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- To provide you with other goods and services that you order from us.
- We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

Who will you share my information with?

In order to provide you with the products and services we offer we may share your information with:

- Employees of Boundless and Boundless Breaks to enable us to complete your booking and carry out any administration requirements.
- Agents and service providers (some of which may be located outside Europe) to collect, hold and process on our behalf your personal information for the purposes set out in this policy. These agents and service providers act on our instructions and will only use your information as we tell them to.
- We may disclose your information to third parties, including the police and other governmental bodies, as required by law or if we think the disclosure may help to detect and deal with crime and unsavoury behaviour.
- We will not sell your information to a third party, except in the unlikely event that we sell our business, or a substantial part of it; in which case we may sell your information as part of the sale to allow the purchaser to carry on providing some or all of our services to you.

How do you manage my information?

We may from time to time appoint other members of Boundless, or third party service providers, to help us manage efficient systems within the business. Some of these systems may for operational reasons be located in countries overseas. We will only transfer your information to service providers who help manage our systems, or overseas, where we are satisfied that adequate levels of protection are in place to protect the integrity and security of any information being processed and compliance with applicable privacy laws.

Your marketing permissions

We would like to send you information about Boundless Breaks products and services.

You are always in control of how we communicate with you. You can change your preferences at any time by calling 03301 230 374.

Disclosing your information to third parties

We use agents and service providers (some of which may be located outside Europe) to collect, hold and process on our behalf your personal information for the purposes set out in this policy. When we allow third party access to your information, we will always have complete control of what they see, what they are allowed to do with it and how long they see it.

We may use member email addresses to display advertisements when they've chosen to opt-in this option and whenever appropriate, including without limitation through Google AdWords, Google

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third-party partner websites and third-party social networking sites such as Facebook. Examples of this type of communication are:

- We may host members' email addresses on Google AdWords for the purpose of matching these addresses with Google accounts and create an audience list. This audience list may then be used for advertising and marketing retargeting purposes on Google Search, YouTube and Gmail. All data hosted on Google AdWords will be kept confidential and secret, and won't be used by Google to build or enhance profiles of Boundless members, in compliance with Google's Customer Match policy.
- We may host members' email addresses on Facebook to enable Facebook to cross-check it with its data in order to create a list of matching users on Facebook. The matched data is only used by Facebook to create this user list and this information is not distributed by Facebook in order to protect the privacy of the users. Once the Facebook user list is created all original data is deleted. The list of matching users will be used for advertising and marketing purposes on Facebook.

We may disclose your information to third parties, including the police and other governmental bodies, as required by law or if we think the disclosure may help to detect and deal with crime and unsavoury behaviour.

We may give your information to third parties to allow them to market their goods and services to you, but only with your express consent.

We will not sell your information to a third party, except in the unlikely event that we sell our business, or a substantial part of it; in which case we may sell your information as part of the sale to allow the purchaser to carry on providing some or all of our services to you.

Please note that this policy addresses only the use and disclosure of information we collect from you. If you give your information to others, whether they are third parties that we introduce you to or third party sites that you visit by clicking on a link on one of our web sites, different rules may apply to their use or disclosure of the information you give to them. We do not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. We encourage you to ask questions before you disclose your personal information to others.

Retention of personal information

We have a system of retention periods in place to ensure that your information is only stored whilst it is required for the relevant purposes or to meet legal requirements. Where your information is no longer required, we will ensure it is disposed of in a secure manner.

Cookies

Cookies are small text files stored on your computer when you visit certain websites. We use first party cookies (cookies that we have set, that can only be read by our website) to personalise your online experience. We also use third party cookies (cookies that are set by an organisation other

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than the owner of the website) for the purposes of website measurement and targeted advertising. You can control the use of cookies inside your browser settings. Further information can be found on our [downloadable PDF document](#).

Links to other websites

Our website contains links to approved partner websites and may from time to time link to partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these sites will operate under their own privacy notices. We do not accept any responsibility of liability for these policies. We advise users to read the privacy notices of other websites before registering any personal data, this privacy notice applies solely to the personal data collected by Boundless.

Keeping your personal data

We will only use and store your information for as long as it is required for the purposes it was collected for. We will, therefore, keep your personal data for as long as it is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we have treated you fairly; or
- to keep records required by law.

We will not retain your personal data for longer than necessary for the purposes set out in this privacy notice. Different retention periods apply for different types of personal data.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

How we secure your data

Information system and data security is imperative to us to ensure that we are keeping our members safe.

We carefully assess, manage and protect new and existing systems to ensure that they are up to date and secure against ever changing threats. We will also limit access to your personal data to those who have a genuine business need to access it. Those processing your data will do so only in an authorised manner and are subject to a duty of confidentiality.

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All our staff complete mandatory information security and data protection training on employment and annually thereafter to reinforce responsibility and requirements set out in our information security policies.

When you trust us with your personal data we will always keep your information secure to maintain your confidentiality. We use a strong encryption when your information is stored or in transit to minimise the risk of unauthorised access or disclosure.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Disclosing your information to third parties

When we allow third parties acting on behalf of Boundless to access your information, we will always have complete control of what they see, how long they see it and what they are allowed to do with it by imposing strict contractual obligations on them. We do not sell or share your personal information for other organisations to use.

Personal data collected and process by us may be shared with the following groups where necessary:

- Boundless employees and volunteers.
- Third party fulfilment partners.
- Third party cloud hosting and IT infrastructure providers who host the website and provide IT support in respect of the website.

Also, under strict controlled conditions:

- Contractors
- Service providers providing services to us
- Advisors
- Agents
- Auditors

We may also disclose your personal information to third parties if we are under the duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or cookie policy and other agreements; or to protect the rights, property, or safety of Boundless, our members, volunteers and employees. This includes exchanging information with other companies and organisations for the purposes of fraud protection.

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Where your personal data is held

Your personal data may be held at our offices, third party agencies, services providers, representatives and agents as described above (see above: **‘Disclosing your information to third parties’**)

Some of these third parties may be based outside of the European Economic Area (EEA). For more information, including how we safeguard your personal data when this occurs, see below: **‘Transferring your personal data out of the EEA’**.

Transferring your personal information out of the EEA

We may transfer your personal information to countries which are located outside the EEA. Whenever we do this, we ensure a similar degree of protection is afforded to your personal information by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If you would like further information, please contact us at membership@boundless.co.uk or telephone: [03301 230 278](tel:03301230278).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information—in certain situations

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Restriction of processing	The right to require us to restrict processing of your personal information—in certain circumstances, for example, if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal information being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal information, for example, processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- Send a written request by either email or letter to our Data Protection Officer (please see '**who are we**')
- let us have enough information to identify you;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know what right you want to exercise and the information to which your request relates.

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information.

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The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: [0303 123 1113](tel:03031231113).

Changes to this privacy notice

We'll amend this privacy notice from time to time to ensure it remains up to date and reflects why we collect and use your personal data. Please visit our website to keep up to date with any changes. The current version will always be posted on our website.

This privacy notice was last updated on 21st May 2018.

Do you need extra help?

If you would like this notice in another format (for example, large print or braille), please contact at membership@boundless.co.uk or telephone: [03301 230 278](tel:03301230278).