

Stf
SCHOOL TRAVEL
FORUM
ASSURED

CONCERT TOURS • SCHOOL TOURS • SKI TOURS • SPORTS TOURS

SAFETY MANAGEMENT SYSTEM AND PRIVACY NOTICE



CERTIFICATE OF COMPLIANCE

This is to certify that
Checkpoint Solutions
has inspected the
Safety Management System of

**Club Europe Group Travel Ltd incl. Club Europe
Ski Tours; Club Europe Concert Tours; Club
Europe Educational Tours; Club Europe Sports
Tours**

and confirm that it complies to the
requirements of the
School Travel Forum Code of Practice

This certificate is valid for one year
and must be renewed prior to its expiry date below.

Signed:

Expiry Date: 06/04/2020

A handwritten signature in black ink, appearing to read 'J. Corradi', is written over a light blue horizontal line.

Chairman



Council for
Learning Outside the Classroom

Learning Outside the Classroom Quality Badge

Awarded to:

Club Europe Group Travel Ltd

This organisation has therefore pledged to:

- Engage in an ongoing process to sustain high quality learning outside the classroom
- Meet all of the Learning Outside the Classroom Quality Badge indicators

Kim Somerville

Chief Executive, Council for Learning Outside the Classroom

Certificate no. R2QB100769

Date issued: 02/04/2019

Expiry date: 06/04/2020

www.lotcqualitybadge.org.uk

Safety on school visits

A major initiative to help teachers and schools.

Supported by



Club Europe is an assured member of the School Travel Forum

The School Travel Forum is a group of leading school tour operators who promote good practice and safety in school travel.

All Assured Members of the STF adhere to a rigorous Code of Practice and Safety Management Standards and are externally verified each year by suitably qualified independent Health and Safety professionals.

Choosing an STF Assured Member ensures teachers and schools are meeting the requirements of DCSF and Scottish Executive guidelines and that they can delegate important tasks with confidence.

During the course of developing the STF Code of Practice, and in addition to liaising with the DCSF, advice has been sought from all leading educational Unions and Associations. The STF initiative is welcomed by the Outdoor Education Advisors Panel (OEAP) and the DCSF. It has the support of the ASCL, NAHT, ATL, NUT, Voice – The union for education professionals and the NASUWT advises members wishing to organise school trips to use companies that have this type of scheme.

Details of the School Travel Forum Code of Practice are available from Club Europe. Alternatively you can visit the School Travel Forum website www.schooltravelforum.com

Whilst these guidelines only technically cover state schools in England, the advice they contain and the information regarding the School Travel Forum Safety Management Standard will undoubtedly be of interest to any school in the United Kingdom which undertakes educational visits, in the interests of establishing best practice.

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1. Statement

Club Europe is committed to providing a safe & secure environment for our clients and staff. Our Safety Management System (SMS) takes all reasonable steps to ensure that this is achieved. As a Tour Operator specialising in European and long haul tours for student groups we have developed our SMS policy over the past 39 years in conjunction with our suppliers and have received advice and guidance from relevant recognised bodies including RoSPA and Checkpoint Health & Safety group. Club Europe complies in full with the DCSF guidance on school visits and is externally verified on an annual basis.

Club Europe maintains a focus on safety and professionalism at all times.

This is achieved by: -

- Ensuring suppliers of each component of a tour fully comply with EU legislation (where directly applicable), national or local government regulations in regard to hygiene, fire, and other safety standards.
- Providing a contract to all our suppliers of accommodation, transport, ski school and ski hire detailing what is expected of them.
- Ensuring Club Europe staff receive suitable training by external consultants on carrying out assessment of suppliers; in conjunction with the guidelines set out in our SMS.
- Ensuring that Club Europe staff are trained to respond quickly and efficiently in the event of an emergency.
- Ensuring that the School Travel Forum (STF) minimum standards for Health & Safety are incorporated into our SMS.
- Undergoing a comprehensive external verification on an annual basis, by suitably qualified consultants appointed by STF.

The review and updating of this system is ongoing and carried out in conjunction with advice from external consultants. A formal review will be completed on an annual basis.



Tim Johnson
Managing Director

24th April 2019

2. SMS Monitoring and Review

The SMS, which has been developed by Club Europe Group Travel, clearly sets out standards that we expect to be met in each component of a tour. The SMS will be reviewed on an annual basis by the Directors who will oversee the management of the system.

Club Europe personnel should notify their line Manager of any situation that has the potential for serious danger to clients and also any noted weaknesses in the SMS.

Managers are to report on a regular basis to the Directors regarding the general implementation of the SMS and monitoring its activities ie: audits.

Club Europe's Safety Management Standards will be independently assessed and verified by an approved external Health & Safety Consultant.

3. Staff Training

3.1 General Staff Training

Club Europe staff receive regular training in all areas for which they are responsible. This ranges from detailed product knowledge through to assessment of all components of a tour, such as accommodation, transport etc.

3.2 Auditor Training

All in-house auditors will complete an STF approved initial training course. This training will enable them to analyse the results of a Standard Accommodation Audit (4.2) as well as conduct a Supplementary Accommodation Audit (4.3) in a satisfactory manner, giving recommendations where appropriate.

Before being allowed to undertake Supplementary Accommodation Audits or assess Standard Accommodation Audits independently, new auditors will be accompanied during a Supplementary Audit and assessed as competent by an auditor with a minimum of 2 years' experience.

For this training Club Europe employs the services of suitably qualified safety consultants on an annual basis. All training is monitored and a record is kept of all training undertaken.

3.3 Crisis Management Training

In addition, Club Europe staff receive regular training in how to manage a crisis. This is delivered by Checkpoint H&S and Touchstone who are specialists in this area for the Travel and Leisure industries.

4. Accommodation

4.1 Accommodation Contract and Certification

For each accommodation centre used in our programmes or featured in our brochures, Club Europe will ensure there is a signed accommodation contract or agent agreement confirming that the accommodation conforms to local and national fire, safety and hygiene standards and liability insurance cover for the duration of the contract. Wherever possible, copies of the relevant documents will be obtained.

Confirmation that the contract conditions are still being met will be obtained every three years.

4.2 SMS Standard Accommodation Audit

This document aims to audit every aspect of fire safety, security, hygiene and the centre's general facilities.

All accommodation used or featured in Club Europe brochures will be subject to a standard audit prior to first use and thereafter at a maximum interval of three years.

The Standard Audit will be completed by Club Europe personnel, accommodation centre manager, or agent.

The results will be assessed by suitably qualified members of Club Europe. Any areas of concern will initiate the appropriate action and in some cases a Supplementary Accommodation Audit will be required (see 4.3).

4.3 SMS Supplementary Accommodation Audit

Where an accommodation centre is used for five groups or more in any one year it will be considered "frequent use" and, within a maximum of twelve months of the frequent use criteria being established, will receive a Supplementary Accommodation Audit.

A Supplementary Accommodation Audit is similar to the Standard Accommodation Audit with the main difference being that it can only be carried out in situ by an auditor trained in accordance with 3.2.

4.4 Monitoring of Accommodation Audits

Following the completion of an Accommodation Audit, we will record audits in the following categories:

- **High Conformity** - Minor or no areas of improvement have been identified. The management will be commended and encouraged to maintain their standards.
- **Acceptable Conformity** - Room for improvement has been identified, but the defects do not render the building unsafe. Defects identified will be brought to the attention of the management at the time of auditing and will be confirmed in writing, together with suggested solutions, within 14 days. Timescales for the resolution of defects will be mutually agreed and monitored.
- **Unacceptable** – The centre is deemed unsafe for accommodating Club Europe groups, even if it may comply with local standards. This centre will be removed from our programme and will not be reinstated until the defects have been rectified and the property re-audited to a standard that is either High or Acceptable conformity.

A schedule of all units indicating the current audit status will be maintained by the appropriate Contracts Manager and a copy of the relevant audit is available on request for those groups to which it applies.

5. Transport

5.1 Air

Club Europe holds an Air Travel Organisers License (ATOL) no. 4249. The Civil Aviation Authority regulates all air transport to and from the UK. This body operates to very strict safety criteria. It is therefore not possible for Club Europe to audit airlines.

5.2 Ferries and Eurotunnel

The cross channel operators we work with comply with independently set safety standards, which, because of their technical nature, it is not possible for us to audit. We do have regular meetings with senior staff from the ferry companies and Eurotunnel. In addition Club Europe staff receive regular training including updates of any new safety initiatives.

5.3 British Coaches

5.3.1 Selection and Contracts

Club Europe will hire coaches from well established reputable companies. We will endeavour to select coach operators who belong to recognized industry bodies such as the Confederation of Passenger Transport (CPT), Guild of British Coach Operators or are Coach Marque accredited operators.

All coach companies used will sign a coach contract in which they confirm that they comply with all national, local, trade and other laws, regulations, rules and codes of practice. This

contract also stipulates a set of safety standards regarding drivers' hours, driver vetting (ensuring drivers have no criminal record or detrimental employment record), insurance cover and vehicle age.

5.3.2 Regular Use list

For coach operators on Club Europe's "Regular Use list" (used more than 5 times in a year) a physical audit will take place at last once every three years. A record of each meeting will be kept and will follow a structure as laid down by the STF. In addition Club Europe will obtain on an annual basis and keep on record a copy of the operating licence, motor vehicle and liability insurance.

A schedule of the audit of coach operators will be maintained and reviewed on an annual basis.

The audit will be completed for the company and not for all the vehicles within the company's fleet.

5.3.3 Infrequently used Suppliers

It is the intention of Club Europe to use coaches from the Regular Use list whenever practical. There are occasions, however when we may select an infrequently used company (one used less than 5 times a year):

- Where a last-minute breakdown or other unforeseen event from a preferred supplier necessitates a subcontracted vehicle
- When a coach breaks down on tour and has to be replaced by another vehicle
- Where a client specifically requests a company not on our preferred supplier list
- Where location of departure may be best served by an infrequently used company

In all these cases the company will be asked to sign a coach contract as outlined in 5.3.1

5.4 Seat Belts

Seat belts will be available for all pupils on British coaches. The regulation regarding seat belts is a British regulation; this does not apply to overseas coaches although efforts are made to ensure overseas Coaches are also fitted with seat belts.

5.5 Itineraries For Tours (Drivers Hours Regulations)

Itineraries are developed to ensure that the requirements of EU drivers' hours' legislation are adhered to. Consequently no additional excursions, other than those previously agreed, are permitted.

5.6 Breakdown

Should a breakdown occur whilst on tour it will be the coach driver's responsibility to ensure the clients are not endangered in any way and the itinerary is disrupted in the minimum way. All coach operators have European Breakdown agreements that are on call 24 hours a day. Should a breakdown necessitate the vehicle to be replaced it is possible this may not be from an audited company in view of the extenuating circumstances. Where a continental vehicle is used it may not have seat belts as this is not a legal requirement in some overseas countries.

5.7 Overseas Coach Companies

Club Europe will work with only reputable coach operators all of whom will sign a Coach contract for non-UK operators in which they will confirm that they comply with all national,

local, trade and other laws, regulations, rules and codes of practice.

Overseas coach operators that are contracted directly which will be used more than 10 times in any one year will be audited every three years and will be asked to supply a copy of their operating licence, motor vehicle and public liability insurance.

Seatbelts are not a legal requirement in some overseas destinations and thus cannot be guaranteed.

5.8 Public Transport

All public transport is regulated nationally. It is therefore not possible for Club Europe to audit public transport.

5.9 Rail Transportation (Including Eurostar)

Rail transport complies with independently set safety standards of the countries through which the train travels. It is therefore not possible for Club Europe to audit rail transportation.

6. Excursions and Visits

Club Europe will take reasonable steps to ensure that, where visits and excursions are included in a final itinerary, the risks have been evaluated and monitored. Information will be provided to group leaders so they are able to make informed decisions for their own group.

6.1 Risk Assessments

Club Europe is pleased to offer free of charge to every group the guide "Demystifying Risk Assessments". This Party Leaders will be asked to ensure that any visit or activity, which they select, is appropriate to the age, abilities and size of their group. Party Leaders will be responsible for ensuring that the students are fully supervised at all times and that any instructions or safety briefings are followed. Where any safety equipment is provided; this must be worn at all times.

Further guidance can be obtained from the DCSF and Local Authorities on all aspects of school trips and outside activities including planning, risk assessment, organisation and supervision.

6.2 Pre-booking Excursions

Club Europe will act as an agent in making enquiries or pre-booking excursions that appear on our excursion sheets. The contract exists directly between the client and the supplier and payment will be made directly by the Party Leader on arrival at the excursion.

7. Concert Venues

Club Europe acts as an agent in providing venues for clients. Indoor venues are generally public buildings such as churches, retirement homes, concert halls and theatres. Outdoor venues can range from areas within theme parks, to town squares, bandstands, and open spaces.

Prior to each concert a "Risk Assessment Form" is completed by the Tour Manager in conjunction with the Party leader. This form is then returned to head office.

If a tour is being undertaken without a Tour Manager then the Party leader will be expected to complete a risk assessment and feedback any Health and Safety concerns in writing within 28 days. As many venues are only temporary and/or used on a one off basis, it is usually not possible for us to inspect them in advance. Any problems, which come to light

as a result of completing the Risk assessment form, will be fully discussed with the party leader.

8. Accidents and Incidents

Club Europe will encourage clients to report any safety related issues immediately. This will enable Club Europe to investigate their concerns and to ensure that any necessary action is taken straight away. To facilitate this Club Europe will provide an Accident / Incident form to all Party Leaders prior to travel.

Club Europe will keep a record of all incidents of which it becomes aware or which are brought to its attention. All reports will be reviewed and where appropriate, an investigation will be undertaken.

9. Ski Specifics

9.1 Ski Equipment

Club Europe works only with established and reputable ski hire shops. Each supplier has a written agreement with Club Europe that specifies the minimum safety and quality standards that we expect for our clients. Should agents contract ski hire on behalf of Club Europe then our guidelines will have been sent to our agents.

It is now a legal requirement in almost all European Countries that students wear helmets when skiing or snowboarding. Most ski schools will refuse to teach students not wearing helmets.

Club Europe are pleased to offer helmets for all participants (students & adults) at no extra cost.

9.2 Ski Instruction

Club Europe works only with established Ski Schools in our European resorts, normally the main ski school for that resort. The ski school will have signed a contract that stipulates the levels of qualifications expected, maximum class sizes for both ski classes (maximum of 12 students per class) and snowboarding (maximum of 10 students per class) and an expectation of fluency in English so that the instructors can be understood and communicate clearly.

9.3 Standard of Up-lift and Runs

All ski lift systems within Club Europe's programme will comply with and be licensed according to local regulation. Furthermore the resorts have been selected as appropriate for school and youth groups, particularly beginners.

10. Emergency Procedures

10.1 Manual

Club Europe has a comprehensive Emergency Procedures manual that clearly defines the roles that all crisis team members will carry out in the unlikely event of a crisis. This plan has been developed in conjunction with Docleaf, specialists in crisis management for the Travel Industry.

10.2 Crisis Management Training

Each year, the Club Europe crisis team undergoes a comprehensive training day in managing crises. This is conducted by Plexus Law and ensures the crisis team are as well prepared as is practicably possible to deal with all unforeseen events.

10.3 External Support

Club Europe has a comprehensive Crisis Management Cover with Plexus law and Checkpoint health & Safety who are

experts in dealing with all type of incidents. This cover will ensure that in the event of an unforeseen crisis all appropriate personnel and qualified assistance is available to both the company and our clients. This is for added peace of mind.

11. Insurance

11.1 Travel Insurance

It is a requirement under the Club Europe SMS that every group that departs has taken adequate travel insurance. Club Europe offers a policy supplied by Endsleigh Insurance and each member of the group is fully covered from the time your booking is confirmed. Any group wishing to use alternative insurance must notify us in writing prior to departure. As only you are fully aware of all your particular needs and other factors which may affect your insurance cover (for example, pre-existing medical conditions of party members), it is the party leader's responsibility to carefully check the travel insurance you are proposing to purchase.

We are of course more than happy to assist you with any queries you may have where we can (if in doubt, you should speak to the insurance company direct).

11.2 Tour Operators Combined Liability Insurance

Club Europe has Tour Operators Combined Liability Insurance which provides cover of up to £10,000,000.

12. Pre-tour Safety Information

All Club Europe groups have access to their own Client Portal which is designed to store all important documentation and invoices from the time of booking right up until departure. Full details of how to access the Client Portal will sent by email once a booking is confirmed.

13. Party Leader Inspection Visits

Club Europe offers the facility for Party Leaders to visit their chosen destination prior to the group's departure. This is to allow the party leader to assess the centre, the surrounding resort and potential concert venues, excursions etc. Club Europe will provide, free of charge, 2 nights bed and breakfast in a twin room at, or near their accommodation centre. Travel and other costs are not included.

These offers apply to Party leaders who hold a confirmed booking with Club Europe (full details of these offers are outlined on our website or in your Confirmation of Booking Summary).

14. Privacy Notice

Club Europe Privacy Notice – Protecting your privacy Introduction

Your privacy is paramount to us. This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how Club Europe uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

We will never share your data with a third party for marketing purposes; it's not how we work.

14.1 What is personal data

Personal data refers to information about you, and from which you could be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more personal data which require a higher level of protection.

14.2 Who does what

For the purposes of the General Data Protection Regulations (EU)(2016/679), the Data Protection Act (2018) and all similar or related legislation ("the Data Protection Legislation), Club Europe holidays Ltd is the data controller. We have appointed Tim Johnson as the Data Processing Officer.

14.3 Legal basis explained

The new laws of data protection set out a number of different reasons for which a company may collect and process your personal data. We believe the following apply to you in terms of how we work:-

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive our marketing updates.

Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, in planning and executing your tour, we will need important personal data such as names, emergency mobile contact numbers, passport information and dietary or medical requirements. We use these only to fulfil our contractual obligations and promise to keep them safe and secure.

Legitimate interest

Where we have an ongoing relationship with you, we will use the non sensitive data we store such as email addresses & past tour information to help us keep you informed of our products and social events.

For example, we will look back on previous tour destinations you may have been to and offer new tours that may be relevant.

We will also use your details to send you direct marketing information by email and occasionally post, telling you about products and services that we think might interest you.

You will have the right to unsubscribe at any time and we will respect your preferences.

14.4 What sort of personal data do we collect?

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

Identity Data: including your first, middle and/or last name, title, date of birth, gender and passport/identity card details.

Contact Data: including your email address, school or club address and telephone numbers, emergency contact details.

Financial Data: Includes payment information, such as bank details, required for us to process your booking.

Transaction Data: includes details about payments to and from you and details of services you have purchased from us.

Special category data: including information relating to disabilities or medical conditions and any dietary restrictions, which may also disclose your religious beliefs.

Profile Data: including your username and password for our portal/website.

Marketing and Communications Data: including your preferences about receiving marketing communications from us and your communication preferences.

Usage Data: including personal data which relates to your usage of our website, products and services.

Technical Data: includes information such as your internet protocol (IP) address, login data, traffic data, weblogs and other communication data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us.

14.5 When and how do we obtain your Personal Data?

Direct Interactions: Some of the personal data we hold is collected through direct interactions with you. This includes personal data that you provide when you engage with us, enquire about our products/services or place a booking with us.

Third Parties: We may collect information about you from a third party when required to do so to fulfil our contractual obligations relating to a booking (for example, when you are a confirmed participant/passenger of a confirmed booking).

Automated technologies and interactions: As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies (see further below and our cookies policy).

14.6 How do we use your personal data?

The Data Protection Legislation sets out a number of different reasons for which a company may collect and process your personal data. We will only use your personal data where the law allows us to.

We believe the following apply to you in terms of how we work:-

Purpose/Activity	Type of Data	Lawful Basis
In order to carry out our obligations arising in connection with any contract entered into between you and us, including: a) to process and manage your booking with us;	Identity Contact Profile Special Category Financial Transaction Marketing and communications	Performance of a contract with you. Legitimate interests (to recover sums owed to us) In relation to special category data, explicit consent.

Purpose/Activity	Type of Data	Lawful Basis
b) manage payments and collect money owed to us; and c) to deal with enquiries and/or resolve complaints.		
To manage our relationship with you, including dealing with any enquiries that you may have.	Identity Contact Profile Marketing and communications	Performance of a contract with you Legitimate interests (to keep our records up to date and study how customers use our products/services)
To administer and protect our business/website (including troubleshooting, data analysis, system maintenance, support, reporting and hosting of data)	Identity Contact Technical	Necessary to comply with a legal obligation
To make suggestions and recommendations to you about goods or services that may be of interest to you/marketing		Consent Legitimate Interests (to develop our products/services and grow our business)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Usage	Legitimate Interests (to understand how our customers use our products/services, keep our website updated, develop our products/services and inform our marketing strategy)

If you have consented to receive marketing communications, we will also use your details to send you direct marketing information by email and occasionally post, telling you about products and services that we think might interest you. You have the right to unsubscribe at any time and we will respect your preferences.

14.7 Who do we share your personal data with?

In the course of preparing your tour we are required to share your personal data with trusted third party suppliers such as transport companies, accommodation suppliers, ski suppliers, concert or sport agents etc. for the purpose of performing our contract with you. These suppliers may be located outside of the UK/EEA.

Where data is required to be transferred outside the UK/EEA for the performance of our contract with you, we will take steps to ensure that all personal data is provided with adequate protection and that all transfers of personal data outside the UK/EEA are done lawfully.

Where personal data is transferred outside the EEA, we will ensure that one of the following applies:

- The transfer is to a country determined by the European Commission as providing an adequate level of protection for personal data (including Privacy Shield for transfers to the US);
- Where we use certain service providers, we may use specific contractual clauses approved by the European Commission which give personal data the same protection it has in Europe; or
- One of the specific derogations provided in Article 49 GDPR applies.

In order for you to travel abroad, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your information for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate.

We may share your personal data with marketing agencies to improve our products and services where we have a lawful basis to do so. We select very carefully our suppliers who process your personal data on our behalf and require that they comply with high security standards for the protection of your personal data.

Through our website we may provide links to third party sites. We are not responsible or liable for the content, privacy policies or services offered by websites or apps other than our website, including those which are linked to from any of the our website. We encourage you to read and familiarise yourself with the privacy policies, terms and conditions and/or other notices on other websites you visit.

14.8 How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

To determine the appropriate retention period for personal data, we will 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.

Some examples of customer data retention periods:

Booked groups

In the case of any booked group, we'll keep the personal data you give us for five years so we can comply with our legal and contractual obligations. Any sensitive data such as dietary or health conditions or passport information will be deleted at the point at which it is no longer necessary.

Inactive groups

If you've not booked a trip with us or had any interaction with us for more than five years, you will be flagged as inactive and

we'll contact you to ask whether you want to be kept on our database. Unless you reply to say 'yes' within 30 days, we'll delete or anonymise the personal data associated with it.

14.9 How do we protect your personal data?

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

14.10 What are your rights over your personal data?

You have more rights now than ever before and here is an overview of your different rights.

You have the right to:

Request access 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.

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please contact The Data Protection Officer, Club Europe Ltd, 22-24 Jaggard Way, London SW12 8SG or email duty@club-europe.co.uk

To ask for your information to be amended please contact your account manager or simply call us up and we will amend the details.

If we choose not to action your request we will explain to you the reasons for our refusal.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

14.11 Cookies

Our website use cookies. A cookie is a small file containing an identity code. With your consent, your computer accepts the cookie and stores it. When you next visit our website, the code is retrieved, allowing an individual visitor or computer to be recognised.

If you'd prefer to restrict, block or delete cookies from this website you can use your browser to do this. Visit www.aboutcookies.org to view full details of how to manage cookies on different types of web browsers.

14.12 About our re-marketing campaign

We are using remarketing to advertise to relevant audiences online. This means that third-party vendors, including Google, show our ads on sites across the internet. Third-party vendors, including Google, also use cookies to serve ads based on browser's past visits to our website. As a visitor to our site you can opt out of Google's use of cookies by visiting Google's Ads Settings. Or, you can opt out of a third-party vendor's use of cookies by visiting Google's Network Advertising Initiative opt out page.

14.13 If you live outside the UK

As we work with clients both in the EU and outside of the EU we will aim to treat everyone's personal data in the same way. The GDPR regulations apply to every member state across the EU, so we all work under the same rules.

Whilst those clients outside of the EU are not directly protected by the GDPR, we will aim to follow the same code and offer you the same assurances.

14.14 Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

14.15 Further Information

If you have any questions about this privacy notice or how we handle your personal information, please contact Tim Johnson on duty@club-europe.co.uk.

Updated November 2019



More from Club Europe

Concert Tours

Our wonderful music tours combine a carefully planned performing programme with cultural excursions and visits. Whether you are a band, orchestra or choir, we create individual tours that match your group's specific profile. Our music team are all practising musicians and passionate about music.

Educational Experiences

Our curriculum-focused trips combine the best excursions, cultural visits and accommodation Europe has to offer. From specialist language courses to art, science and history trips, all our tours support specific learning modules and are uniquely planned to match each group's requirements.

Freephone 0800 496 4996

or go to

www.clubeurope.co.uk

International Tours

We organise bespoke ski, concert and educational trips to Europe for international students. Our multi-destination tours ensure students get the unique flavour of each country they visit. All our tours are planned according to each group's individual needs and requests.

Sports Tours

From the summer of 2016 we will be offering high quality sports tours to a select few European destinations. Our focus will be on ensuring the "Club Europe" attention to detail extends to this new brand - in Football, Rugby, Hockey and Netball. Contact us to find out more.

For more details go to www.clubeuropeinternational.com



clubeurope
ski tours

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22-24 Jaggard Way, London SW12 8SG **Email:** travel@club-europe.co.uk

