

Privacy policy

This privacy policy is issued on behalf of the AQUA SUPS so when we mention “AQUA SUPS”, “we”, “us” or “our” in this privacy policy, we are referring to AQUA SUPS who are responsible for processing your data. AQUA SUPS is the controller and responsible for this website.

AQUA SUPS understands and respects the importance of your privacy. This privacy policy explains what personal information we may collect from you, how we will look after that information, and how we may use your data. The policy tells you about your privacy rights, and how the law protects you.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: AQUA SUPS

Email address: info@aquasups.com

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the United Kingdom’s supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party website and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

What information will AQUA SUPS collect from me?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The information we will typically collect will consist of; your name, email address, postal address, telephone and mobile number, gender, date of birth, as well as information collected about your holiday preferences. We also collect information about the transactions you undertake through this site, including details of payment cards used.

We may obtain additional information about you from other reputable data sources. This information may relate to your demographics and lifestyle interests and be matched to our records to enhance our understanding of the sorts of products and services you may be interested in and to provide you with a more personalised experience.

Unless you are explicitly informed, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinion, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Personal data is stored securely in a central data centre and is only shared with third parties that are vital to the fulfilment of our contracted services to customers.

The data these companies might hold about you may be personal data such as names and addresses collected from publicly available sources, such as the Edited Electoral Register. It might also include non-personal anonymised data from research surveys.

The data these companies use to create their postcode level products include publicly available sources such as the Census and Land Registry data.

Retention of data

AQUA SUPS retains personal data for seven years, after a customer's last interaction with us, unless you exercise your right to be forgotten (see below). Data is retained for this period to ensure we can comply with any legal obligations that may arise where we are required to share historic data.

IP addresses

We may collect information about your computer including, where available, your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

When will AQUA SUPS collect information from me?

We will collect information from visitors to this website who provide us with their details in order to apply for our products or services, receive online newsletters, email and/or SMS notifications, register for promotions, provide us with feedback, through the use of online forms, online competitions, email hyperlinks, completion of paper or online surveys & when you email us directly with your details.

We will collect personal information from you when you telephone or email us enquiring about a booking. We will also collect personal information about you when you make a

confirmed booking, or make a purchase on the telephone, on our website, via email or letter. The provision of this personal information for the specific purpose of a travel booking or purchase is deemed as a contractual requirement in order to fulfil your holiday booking. The failure to provide personal data for these purposes will result in a failure to complete the booking process.

How will AQUA SUPS use my personal information?

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interest.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before third party direct marketing communications to your via email or SMS. You have the right to withdraw consent to marketing at any time by contacting us.

We use information held about you in the following ways:

- To provide you with our services and information that is relevant to you, and also to deal with your requests and enquiries.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To provide you with information related to a booking quote or reservation, or other information you may have requested.
- To process and complete your booking and to carry out our obligations that may arise in connection with any contracts entered into between you and us, or between you and a third-party supplier.
- To notify you about changes to our services, your reservation or booking.
- To contact you for reasons that are relevant to the service you have requested, such as password reminders or information about your reservation or booking.
- To provide you with product and marketing information and offers that we or selected third parties feel may interest you.
- Your data will not be supplied to third parties unless you have given express consent for us to do so. Third party offers will only be sent to you if you opted-in to receive such communications at the point of supplying your personal information.
- Where we provide personalised services, we may analyse the information you supply, so that we can offer a more relevant, tailored service. For instance, we may use information on the type of holiday activities you are interested in to provide personalised recommendations or content on our website. If you have subscribed to

receive email offers, you will receive a personalised service that is tailored to your interests.

- For analysis and processing purposes, to ensure we are offering the best, most relevant service to our customers.

Marketing

We explicitly outline that by consenting to receive marketing communications, you are consenting for your personal information to be processed. This is outlined at the point you provide your data and marketing contact consent. If you do not want us to obtain this additional lifestyle information from these reputable data sources, and use as described above, please contact us.

We will only contact you in the ways that you have opted in to receive communication from us. These may be all or a combination of the following; telephone (mobile and/or landline), SMS, email or direct mail. You can change or update your contact preferences by emailing info@aquasups.com

We will only contact you with marketing information about goods and services similar to those which were the subject of a previous sale to you, or preferences that you have stated you wish to receive information about, and that we think will be of interest or relevant to you.

We will never share or sell your personal information with third-parties unless you have specifically agreed for us to do so on your behalf. Wherever this is the case, the nature of the business of the third parties will be outlined to you in advance of receiving your permission.

Our site contains links to and from the websites of our principals, suppliers, advertisers and other third parties. If you follow a link to any of these other websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or for these third-party websites. Please check these policies before you submit any personal data to these websites.

Where is my personal data stored?

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by organisations operating outside the EEA that work for us or for any of our suppliers (e.g. airlines, hoteliers, etc.).

Countries outside of the EEA may not have the same level of privacy laws as exist in the UK. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How is my information disclosed?

We may disclose your personal information to any Partner of AQUA SUPS which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006, to relevant third parties who will supply the travel arrangements or other services you request, to Government bodies and other authorities to whom we are legally obliged to pass your data (e.g. border agencies of countries you intend to visit) and to relevant third parties for the purpose of fraud protection and credit risk reduction.

Cookies

This site uses cookies to distinguish you from other users. Some of these cookies are essential to make this site work properly, to allow you to make your travel booking or other purchases, and to enable AQUA SUPS to fulfil your purchase requests. Other types of cookie help us to provide you with a good experience when you browse our site, allow us to improve our site or the way we provide our service to customers, or are used to provide you with information or offers from AQUA SUPS and/or third parties that may be of interest to you.

You can accept or decline cookies at any time by accessing the preference panels from your browser's main menu (usually found under 'Edit', 'Tools' or 'Options'). However, if you choose to remove cookies parts of the site may not work properly or your use of the site may be impaired.

In order to help us maintain and improve our service to you we also use 'cookies' to collect information about your use of the website. Cookies are a feature of web browser software that allows web servers to temporarily store information within your browser, which, in turn, allows us to recognise the computer used to access our site. Most browsers automatically accept cookies but you can delete existing cookies from your browser. You can also edit your browser options to choose not to receive cookies in future. We may use cookies to keep track of the transaction from one page to the next.

We use third-party application service providers to perform some tracking functions. These companies may use cookie-based information (not including your name, address email

address or telephone number) about your visits to this and other web sites in order to measure advertising effectiveness. We may also collect information about your visit to our website, based on your browsing (click stream) activities. This information may include the pages you browse and products and services viewed or booked for example. This helps us to better manage and develop our offers and to provide you with better products and services tailored to your individual interests and needs. We may use this information to measure the entry and exit points of visitors to the site and respective numbers of visitors to various pages and sections of the site and details of searches performed. We may also use this information to measure the usage of advertising banners, other click-throughs from the site. We may disclose information of this nature in aggregate form to third parties but personal information on individual visitors will not be passed on to any third party.

Please note:

If you choose to use this site without declining any non-essential cookies, then your use will constitute implied consent to the non-essential cookies that are set.

Your legal rights

Under certain circumstance, you have legal rights under the UK data protection act (GDPR) in relation to your personal data.

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 your 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 this 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, 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 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 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.

No fee usually required

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.

What we may need from you

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 for further information in relation to your request to speed up our response.

Time limit to respond

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.

Changes to our privacy policy

We reserve the right to update or alter this privacy policy from time to time without notice to you. This policy was last updated in December 2019.