

What is the purpose of this document?

Swans Travel LTD is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information through the use of our CCTV systems about you and in the following contexts:

1. During your working relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).
2. If you engage our Coach Travel Services.

It applies to all employees, workers, contractors and customers.

Swans Travel LTD is a "controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former employees, workers and contractors and customers. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

Data protection principles

We will comply with data protection law, which says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you

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 person's identity has been removed (anonymous data).

There are certain types of more sensitive personal data which require a higher level of protection, such as

information about a person's health, sexual orientation or criminal convictions.

In the operation of our CCTV systems on both our premises and installed to our vehicles we will potentially capture the following personal data:

- Images of you;
- Recordings of you.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your health, including images that may identify a medical condition that is captured as part of our CCTV recording.

How is your personal information collected?

We collect personal information about employees, workers and contractors through the use of our CCTV systems installed at our premises and in our vehicles. The CCTV systems installed at our premises record images continuously.

CCTV systems installed to our vehicles record images when the vehicle's ignition is engaged and ceases recording when the ignition is disengaged.

How we will use information about you

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

1. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.
2. Where the processing is necessary to protect the vital interests of data subjects.

We may also use your personal information in the following situations:

1. Where it is required for the prevention and detection of crime.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to perform our contract safely with our customers and enable and implement a safe premises for our staff to work within. The situations in which we will process your personal information are listed below.

In the context of Employees:

- Gathering evidence for possible grievance or disciplinary hearings.
- Making decisions about your continued employment or engagement.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Complying with health and safety obligations.

In the context of Customers

- Resolving & investigating complaints.

- Investigating and recording incidents that may occur in the performance of our contract, specifically providing coach travel services.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or trade union membership, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. Where it is necessary to protect you or another person from harm.
2. On the basis of substantial public interest.

Situations in which we will use your sensitive personal information

Special Category data may be captured through the CCTV recordings either on our coaches or when you visit or use our premises. The special category data we anticipate may be captured through the CCTV recordings may concern identifiable health information, such as the requirement for assisted access.

- We will only use this special category data if it is captured as part of our usual recordings. The footage may then be processed by review or shared in line with this privacy notice if an incident occurs that requires investigation.

Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This is usually where that processing is necessary to carry out our obligations.

We anticipate that there will be limited circumstances whereby we collect criminal conviction data, however, we anticipate that the criminal conviction data we may collect will only be limited to data that could substantiate a criminal conviction, whereby an action occurs that could attract criminal proceedings. We anticipate that these instances may include attempts to enter our premises unlawfully, our drivers not adhering to road traffic legislation or if customers (in very limited circumstances) act in an aggressive manner on one of our Coach Trips. This list is non-exhaustive.

We are allowed to use your personal information in this way on the basis of legitimate interest, and these interests include, but are not limited to, ensuring that our premises and coaches are managed and operated in a safe environment.

Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the group.

We require third parties to respect the security of your data and to treat it in accordance with the law.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. For example, where we are preventing or detecting unlawful acts.

How secure is my information with third-party service providers and other entities in our group?

All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible sale or restructuring of the business. In this situation we will, so far as possible, share anonymised data with the other parties before the transaction completes. Once the transaction is completed, we will share your personal data with the other parties if and to the extent required under the terms of the transaction.

We may also need to share your personal information with a regulator or to otherwise comply with the law.

Data security

We have put in place measures to protect the security of your information. Details of these measures are:

- accessible by authorised personnel
- stored in locked rooms on
- backed up on servers within our office

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

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

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

Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we 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.
- The applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information without further notice to you. Once you are no longer an employee, worker or contractor of the company, we will retain and securely destroy your personal information with 31 days

Rights of access, correction, erasure and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).

- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the data privacy manager in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the 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 the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data protection officer (DPO)

We have appointed a data privacy manager to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the data privacy manager

Igli Peci

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You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) with respect to data protection issues



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.