**Privacy Policy**

This Privacy Policy (“Privacy”) sets out how Open Up processes and protects the privacy of your personal information.

We need to collect, use and disclose personal information in order to perform our business functions and activities, including making and managing travel bookings on behalf of our customers. We are firmly committed to protecting the privacy and confidentiality of personal information and to maintaining various physical, electronic and procedural safeguards to protect personal information in our care.

For the purposes of the EU General Data Protection Regulation and other similarly situated legislation we are a “data controller” (or equivalent) for the processing of personal information you provide to us in connection with:

* our provision of business travel services;
* event management services;
* the provision of leisure travel services; and
* for the purpose of all our marketing activities.

There may be instances where your local data protection laws impose more restrictive information handling practices than the practices set out in this Privacy. Where this occurs, we will adjust our information handling practices in your jurisdiction to comply with these local data protection laws.

**The types of personal information**

Generally, the type of personal information we collect about you is the information that is needed to facilitate your travel arrangements and bookings and to arrange travel related services and/or products on your behalf.

We therefore typically process the following types of personal information about you:

* contact information (such as name, residential/mailing address, telephone number, email address);
* health information such as your dietary requirements and health issues (if any); and
* other details relevant to your travel arrangements or required by the relevant travel service provider(s) (e.g. airlines and accommodation or tour providers).

We also collect online identifiers such as your IP address and data regarding your device and the network you are using to connect with us.

We will only collect sensitive information in compliance with your local data protection laws, with your explicit consent and where it is reasonably necessary for, or directly related to, one or more of our functions or activities (e.g. to make travel arrangements), unless we are otherwise required or authorised to do so by law. To the extent permitted or required under your local data protection laws, you consent to us using and disclosing your sensitive information for the purpose for which it was collected. For example, if you provide health information to us in connection with a travel insurance application you would like to make, you consent to us using and disclosing that health information in connection with arranging that travel insurance on your behalf. A further example is if you disclose your religious beliefs to us because you are interested in, for example, certain holiday packages, in which case you consent to us using and disclosing that information in connection with facilitating your request. We will not use or disclose sensitive information for purposes other than those for which it was collected, unless we subsequently receive your consent to use it for another purpose.

**Collection of personal information**

We will only collect personal information in compliance with your local data protection laws. We usually collect your personal information directly from you during the course of your relationship with us. We will collect this information directly from you unless it is unreasonable or impracticable to do so.

Generally, this collection will occur:

* when you deal with us either in person, by telephone, letter, email;
* when you visit our website; or
* when you connect with us via social media.

We may collect personal information about you:

* when you purchase or make enquiries about travel arrangements or other products and services;
* when you enter competitions or register for promotions;
* when you request brochures or other information from us; or
* when you provide information, or use our services, on social media.

Unless you choose to do so under a pseudonym or anonymously, we may also collect your personal information (other than sensitive information) when you complete surveys or provide us with feedback.

In some circumstances, it may be necessary for us to collect personal information about you from a third party. This includes where a person makes a travel booking on your behalf which includes travel arrangements to be used by you (e.g. a family or group booking or a travel booking made for you by your employer). Where this occurs, we will rely on the authority of the person making the travel booking to act on behalf of any other traveller on the booking.

You should let us know immediately if you become aware that your personal information has been provided to us by another person without your consent or if you did not obtain consent before providing another person's personal information to us.

We make every effort to maintain the accuracy and completeness of your personal information which we store and to ensure all of your personal information is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal information or if you become aware that we have inaccurate personal information relating to you. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal information that you, or a person acting on your behalf, provide to us.

We will only process your information, where:

* you have given your consent to such processing
* the processing is necessary to provide our services to you;
* the processing is necessary for compliance with our legal obligations; and/or
* the processing is necessary for our legitimate interests or those of any third party recipients that receive your personal information.

When you book or otherwise arrange travel related products and services through us, we usually act as an agent for the relevant travel service providers (e.g. for a hotel). In this case, we process your personal information as necessary so as to provide the services you requested from us. This usually includes collecting personal information about you both for our internal purposes as described in this Privacy and for the travel service provider for whom we act as agent (e.g. to provide you with the booked services). For example, if you book a flight through us, then we use your personal information to enable your flight to be booked and disclose it to the airline to enable the airline to provide the flight service to you.

We may therefore share your information with our travel service providers such as hotel, airline, car rental, or other providers, who fulfill your travel bookings. Please note that these travel service providers also may use your personal information as described in their respective privacy policy and may contact you as necessary to obtain additional information about you, facilitate your travel reservation, or provide you with your requested services. We encourage you to review the privacy policies of any third-party travel service providers whose products you purchase through us. We will provide you with copies of all relevant travel service provider terms, conditions and privacy policies on request.

Where permitted by local data protection laws, we may use your personal information to send you targeted marketing activities relating to our products and services (and those of third parties) that we think may interest you, unless you have requested not to receive such information. These may include, but are not limited to, mail outs, electronic marketing and notifications as described below, and telephone calls). We will only use your personal information to send electronic marketing materials to you (including e-newsletters, email, SMS, MMS and iM) if you have opted-in to receive them or not opt-ed out of receiving them, depending upon the applicable law. You can subscribe to receive e-newsletters and other electronic promotional/marketing materials by following the relevant links on our website or requesting one of our consultants to do so for you.

**Disclose personal information to third parties**

We do not and will not sell, rent out or trade your personal information. We will only disclose your personal information to third parties in the ways set out in this Privacy and, in particular, as set out below, and in accordance with your local data protection laws. Note that, in this Privacy, where we say “disclose”, this includes to transfer, share (including verbally and in writing), send, or otherwise make available or accessible your personal information to another person or entity.

Your personal information may be disclosed to the following types of third parties:

* our independent contractors, suppliers and service providers, including without limitation:
* suppliers of IT based solutions that assist us in providing products and services to you (such as any external data hosting providers we may use);
* publishers, printers and distributors of marketing material;
* event and expo organisers;
* marketing, market research, research and analysis and communications agencies;
* mailing houses, freight services, courier services; and
* external business advisers (such as lawyers, accountants, auditors and recruitment consultants);
* our related entities and brands;
* travel service providers such as travel wholesalers, tour operators, airlines, hotels, car rental companies, transfer handlers and other related service providers;
* any third party to whom we assign or novate any of our rights or obligations;
* financial institutions such as banks, when processing financial transactions;
* a person making your travel booking on your behalf, where you are travelling on a booking made on your behalf by another person (for example, a family member, friend or work colleague);
* your employer, where you are an employee of one of our corporate, business or government clients and you are participating in an event or travelling for work purposes;
* a person who can verify to us that they have a relationship with you (e.g. a family member) where you are not contactable, the person correctly answers our required security questions and the request is, in our opinion, in your interest (for example, where the person is concerned for your welfare or needs to undertake action on your behalf due to unforeseen circumstances);
* as required or authorized by applicable law, and to comply with our legal obligations;
* customs and immigration to comply with our legal obligations and any applicable customs/immigration requirements relating to your travel;
* government agencies and public authorities to comply with a valid and authorized request, including a court order or other valid legal process;
* various regulatory bodies and law enforcement officials and agencies, including to protect against fraud and for related security purposes;
* enforcement agencies where we suspect that unlawful activity has been or may be engaged in and the personal information is a necessary part of our investigation or reporting of the matter: and

When you engage us to book flights on your behalf, we will provide your personal information (i.e. name, email address and/or mobile number) to the relevant airline. This enables airlines to advise passengers of irregular flight operations and disruptions (e.g. flight cancellations, schedule changes) directly.

Other than the above, we will not disclose your personal information without your consent unless we reasonably believe that disclosure is necessary to lessen or prevent a threat to life, health or safety of an individual or to public health or safety or for certain action to be undertaken by an enforcement body (e.g. prevention, detection, investigation, prosecution or punishment of criminal offences), or where such disclosure is authorised or required by law (including applicable privacy / data protection laws).

**Social Media Integrations**

Our website may use social media features and widgets (such as “Like” and “Share” buttons/widgets). These are provided and operated by third party companies (e.g. Meta) and either hosted by a third party or hosted directly on our website. Social media features may collect information such as the page you are visiting on our website/mobile application, your IP address.

If you are logged into your account with the third party company, then the third party may be able to link information about your visit to and use of our website to your social media account with them. Similarly, your interactions with the Social media features may be recorded by the third party. In addition, the third party company may send us information in line with their policies, such as your name, profile picture, gender, friend lists and any other information you have chosen to make available, and we may share information with the third party company for the purposes of serving targeted marketing to you via the third party social media platform. You can manage the sharing of information and opt out from targeted marketing via your privacy settings for the third party social media platform.

Your interactions with these Social media features are governed by the privacy policy of the third party company providing them. For more information about the data practices of these third party companies, and to find out more about what personal information is collected about you and how the third party uses such personal information, please refer to their privacy policy directly.

**IP addresses**

When you access our website or open electronic correspondence or communications from us, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer, and which are generally assigned when you access the internet.

We may use IP addresses for system administration, investigation of security issues and compiling anonymised data regarding usage of our website and/or mobile applications. We may also link IP addresses to other personal information we hold about you and use it for the purposes described above (e.g. to better tailor our marketing and advertising materials, provided you have opted in to receive electronic marketing).

**Tracking Technologies**

We may use third-party web analytics services on our website. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our website.

**Linked Sites**

Our website may contain links to third party websites over which we have no control. We are not responsible for the privacy practices or the content of such websites. We encourage you to read the privacy policies of any linked third party websites you visit as their privacy policy and practices may differ from ours.

**Privacy**

We may amend this Privacy from time to time. If we make a change to the Privacy, the revised version will be posted on our website. We will post a prominent Privacy on our website to notify you of any significant changes to our Privacy and indicate at the end of the Privacy when it was most recently updated. It is your responsibility, and we encourage you, to check the website from time to time in order to determine whether there have been any changes.

**Contact details of responsible for the data protection**

Open Up

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This Privacy Policy was last updated on 01 November 2022.