

STK Events Limited t/a Saffron Travel

Our Company Privacy Policy

This privacy policy will explain what data we collect and process about you in connection with your relationship with us as a customer through your use of our website, mobile applications and online services.

We must point out that when we use the word You or Your we mean the data relating to any of our customers which includes any parties that we create bookings for and not just the people who make the bookings with us. This is especially applicable in the case of bookings made by schools or parents on behalf of minor children. All of those parties, the children, parents and teachers are protected by the applicable legislation and this privacy statement applies to all of their personal data.

Further we note that where any part of this privacy statement refers to consent and the giving of same where the context of the use of that term indicates that consent has been given by a minor it is intended by this statement that the term consent is given by the person authorised by law to give consent on behalf of that minor being a parent or guardian or the minor themselves, as the case maybe, if or when required by the applicable data protection legislation.

All personal data is collected and processed in accordance with Irish and EU data protection laws.

Topics considered in this Privacy Statement:

1. Data Controller; what does this mean?
2. What data do we collect?
3. How do we collect your data?
4. How will we use your data?
5. How do we store your data?
6. Marketing
7. What are your data protection rights?
8. What are cookies?
9. How do we use cookies?
10. What types of cookies do we use?
11. How to manage your cookies
12. Privacy policies of other websites
13. Changes to our privacy policy
14. How to contact us
15. How to contact the appropriate authorities

1. Data Controller:

“Saffron Travel” (referred to as “we”, “us”, “our” or “Saffron Travel” in this policy) in this policy primarily refers to STK Events t/a Saffron Travel, the main operating company of STK Events. STK Events t/a Saffron Travel is the “data controller” of all personal information that is collected and used about Saffron Travel customers for the purposes of GDPR and any applicable Irish Legislation. Saffron Travel is registered in Ireland with registration number 428611 and our registered offices are at 97 Rathmount, Blackrock, County Louth, Ireland.

As we are by law your agent we will be processing your personal data by providing it to third parties, travel service providers, (defined below) such as airlines, transport companies, accommodation providers, travel insurance companies and event organisers; this is the very purpose for which you use us and this processing is therefore essential so that we can act as your agent. In the bookings that we arrange for you, we will identify to you the name of travel service providers on the itinerary of travel. The travel service providers will be the “data controller” of your personal data in respect of the service they are providing, if the country in which that travel service provider operates is subject to GDPR. This means that each of those travel service providers will have to provide you a privacy policy directly and will have the data protection obligations that are applicable in their respective countries. Any issues you have with the processing of your personal data by them will have to be dealt with by you contacting each individual travel service provider directly. If the travel service provider to whom your personal data is given is outside of the jurisdiction of the GDPR you will have to contact them directly about data protection laws in their jurisdiction, if any.

Your personal data will not be given to any third parties who are not travel service providers, as defined herein, unless it is necessary for the carrying out of our contract or you have consented to such processing of your personal data.

For the purposes of this privacy statement the term travel service providers shall mean the following;

- Tour Operators, hotels or accommodation providers, restaurants for the purposes of ticketing, age validation, check in, room distribution, catering or other administrative purposes they require the data for in order to accept our booking for you.
- Attractions for the purposes of booking, ticketing, age validation, check in
- Airlines for the purposes of generating tickets and/ or travel documentation such as boarding cards
- Insurance Partner for the purposes of providing travel insurance for your booking
- Other parties to comply with commercial laws and customer service obligations.

2. What data do we collect?

Personal data means any information relating to you which allows us to identify you, such as your name, contact details, payment details and information about your access and use of our website.

We will collect personal data from you when you book with us for the reasons as detailed in this statement (either directly or via your child’s school), create a Saffron Travel account, use our website and / or App and other websites accessible through our website and / or App, participate in a survey or competition, or when you contact us. Specifically, we may collect the following categories of information:

1. Group Leader (Organising Teacher): Full Name, DOB, Gender, Passport Information, Email, Phone number, Address, Special Dietary Requirements (for the purposes of catering) and Pre Existing Medical Conditions (for the purpose of special arrangements and ensuring adequate insurance) and the communications you exchange with us or direct to us via letters, emails, text, calls, and social media.
2. Other Passengers (Teachers and Pupils): Full Name, DOB, Gender, Passport Information, Email, Phone number, Special Dietary Requirements (for the purposes of catering) and Pre Existing Medical Conditions (for the purpose of special arrangements and ensuring adequate insurance) and the communications you exchange with us or direct to us via letters, emails, text, calls, and social media.
3. Person of Authority (Parent or Guardian): Full Name, Email, Phone number, Address and Payment Information
4. Personal Data of Minors/ Person of Authority: We obtain data related to minors. The purpose of collection of this data is to allow us to provide the travel service and travel arrangements for the minor. Personal data of minors is obtained through a person of authority (i.e. a group leader or a parent/guardian).
5. Special Categories of personal data Personal details about your physical or mental health, are considered “special categories of personal data under the GDPR and applicable data protection laws. We will only process such data where you have given your explicit consent, for example where you request special assistance before or during a flight or on a tour, we will need to provide this information to the airline and/or our service providers so they can provide the assistance you have requested or where it is necessary to protect your vital interests or those of other people.
6. When you have a specific medical condition, you need to inform us of that in writing and in some instances provide us with medical certificate or documentation that we will discuss directly with you. This is for your safety.

3. How do we collect your data?

You or persons on your behalf (guardians, group leaders or teachers(schools)) directly provide Saffron Travel with all of the data we collect. We collect data and process data when you or they;

1. Register online to make a booking or order any of our products or services or
2. Voluntarily complete a customer survey or provide feedback on any of our message boards or
- 3.via email Use or
- 4.view our website via your browser's cookies.

4. How will we use your data?

Our Company collects your data so that we can:

- Make travel arrangements for yourself or the minor that you register/ make a booking for
- Process your order
- Management of your account - such as issuing payment reminders or to any discuss your account
- Email you with special offers on other products and services we think you might like, but only as long as explicit consent has been given for this service. As a marketing

service this can be opted out of at any time. See the section headed marketing below.

- Arrange the payment of and the booking of school tours for you/your child
- Arrange for travel protection insurance to protect the travellers when they go on the trips that we book for them

5. How do we store your data?

Your personal data is stored electronically in protected servers both in Saffron property and offsite

All personal identification information is protected using a combination of technical, physical and administrative processes to safeguard your personal data. These processes include firewalls, data encryption and access controls which require authorisation.

Sensitive information (such as credit card number, account number, obtained for the purposes of making a payment) is protected by secure server software. This secure software encrypts financial information provided online through the use of the Secure Sockets Layer (SSL) protocol. It prevents anyone else reading your personal and sensitive information while your fee is being processed online. It is your responsibility to keep your password secure at all times to avoid unauthorised use of your Easy Payments Plus account. All access to the system is by password protected sign on. All passwords are encrypted using SHA1 Hash algorithm.

Our Company will retain your Data for the amount of time that is necessary to fulfil your booking with us and for our legal obligations as a commercial entity operating in the Republic of Ireland. Data can be retained for as little as 48 hours and up to 3-5 years depending on the nature of the data and individual circumstances. In every case we have carefully considered the best interests of our clients.

6. Marketing

Our Company may occasionally contact our Group Leaders via text/email with relevant offers on travel services they have purchased from us in the past. All such contacts contain simple and immediate opt-out options. If you have agreed to receive marketing, you may always opt out at a later date.

You have the right at any time to stop Our Company from contacting you for marketing purposes or giving your data to other members of the Our Company Group. If you no longer wish to be contacted for marketing purposes, please contact support@saffrontravel.org

7. What are your data protection rights?

The right to access - You have the right to request Our Company for copies of your personal data. We may charge you a small fee for this service.

The right to rectification - You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete information you believe is incomplete.

The right to erasure - You have the right to request that Our Company erase your personal data, under certain conditions.

The right to restrict processing - You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.

The right to object to processing - You have the right to object to Our Company's processing of your personal data, under certain conditions.

The right to data portability - You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request in respect of the exercise of any of the foregoing rights, we have one month to respond to you, unless your requests are onerous in which case we are permitted to take longer to reply. If you would like to exercise any of these rights, please detail your request in writing, via email to support@saffrontravel.org

8. What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

For further information , visit allaboutcookies.org.

9. How do we use cookies?

Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website

10. What types of cookies do we use?

There are a number of different types of cookies, however, our website uses:

- **Functionality** - Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** - Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address. Our Company sometimes shares some limited aspects of this data with third parties for advertising purposes.
- **We may also share online data collected through cookies with our advertising partners.** This means that when you visit another website, you may be shown advertising based on your browsing patterns on our website.

11. How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

12. Privacy policies of other websites

The Our Company website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

13. Changes to our privacy policy

Our Company keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 18th May 2021.

14. How to contact us

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us via email to support@saffrontravel.org

15. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Our Company has not addressed your concern in a satisfactory manner, you may contact the Data Protection Commissioner's Office at 21 Fitzwilliam Square South Dublin 2 or on the website www.dataprotection.ie.