

Privacy policy

Last updated: 10/10/2018

At Capita Travel and Events we process important, valuable and confidential data on behalf of our customers. We do this in a secure, transparent and appropriate way and have prepared this document to demonstrate our security commitment in the context of travel procurement, and the regulations on data protection, GDPR.

General Data Protection Regulation (GDPR)

GDPR is in effect from Friday 25 May 2018 and it replaces the Data Protection Act 1998. Significant and wide-reaching in scope, the GDPR brings a new approach to data protection and there are some important changes. It extends the rights of individuals to control how their personal information is collected and processed and places a range of new obligations on organisations to be more accountable for data protection. The GDPR requires that organisations be able to demonstrate compliance with the data protection principles.

This involves taking a risk-based approach to data protection, ensuring appropriate procedures and policies are in place to deal with the accountability, transparency and individuals' rights provisions, whilst also developing a workplace culture of data privacy and security.

Our industry

The business travel sector is highly complex in relation to reservation distribution channels that underpin it, and that power all travel management companies and business travel supply chains in the UK and globally.

Capita Travel and Events, acting as agent to the organisations we serve, has been working diligently within the broad supplier chains that make up the complex business travel and meetings eco-system, industry groups within the sector (including the GTMC – Guild of Travel Management Companies) and data protection experts to ensure readiness and enablement of customer compliance to the new regulations encompassed within GDPR.

Your data

Data ownership

Capita Travel and Events acts as a data processor when processing our customers' personal data and will process it in accordance with the law and the contractual obligations in our contracts.

This means only processing customer data in accordance with the written instructions of our customers, who are the data controllers.

Data collection

For the purpose of providing travel and event services Capita Travel and Events collects, uses, and discloses personal data. Personal data is any information that can be used to identify you or that we can link to you.

Any user of the services, may be asked to provide certain personal data such as: name and contact information (work and home/mobile phone, fax, email, address); emergency contact names and information; preferences and trip/meeting details e.g. seat preferences, frequent flyer club membership, class of service, meal preferences, hotel/rail/car and other ground transportation membership, special accommodation requests, other personal data supplied by you via your login profiles.

Dependent upon the type of service taken you may also be asked to supply additional documentation such as passport/visa/driver's licence number, and date of birth.

Data sharing

Each customer of Capita Travel and Events can be assured that Capita Travel and Events is taking the necessary steps with its suppliers (who are sub-processors of the personal data) to require them to comply with the GDPR using both contractual clauses and annual due diligence reviews.

For the purpose of fulfilling the provision of travel and event services any personal data collected may be shared with or disclosed to Capita Travel and Event's customer as the data controller, for the purpose of management information, auditing, tracking and other purposes as necessary.

Capita Travel and Events and its related companies, partners, subcontractors, and agents as necessary to fulfil and support the Services, including facilitated bookings and assistance, responding to queries, ticket issue, responding to requests, and engagement in customer campaigns or supplier promotions.

Third party service providers to fulfil contractual travel and events services (e.g. Global Distribution Systems (GDSs); trains, hotels, airlines, rental car / and other ground transportation companies, car parking facilities and other travel suppliers for booking purposes).

Additionally; technology platform providers, including, without limitation, online booking tool providers, meeting registration software providers (including onsite and mobile event management solution providers), visa and passport providers; credit card companies and payment collection and processing companies).

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Data transfers

When sharing with or disclosing personal data to other parties, as stated above, personal data may be transferred to countries with data protection laws providing a lower standard of protection for your personal data than your country.

We will transfer your personal data in compliance with applicable data protection laws, including having adequate mechanisms in place to protect your personal data when it is transferred internationally e.g. facilitating [Model Clauses](#), data protection agreements, independently audited Privacy Shield (US).

Data governance

Capita Travel and Events is governed by a comprehensive Information Security Policy set and regularly audited by Capita plc. Policies include data security, information technology, physical security, data protection and cyber defence.

A formal breach notification plan is in place detailing reporting lines and time frames for reporting internally through our incident management tool.

Should an incident occur that affects any customers materially, we will notify in accordance with contractual obligations.

Capita Travel and Events is an ISO 27001 and Cyber Essential Plus certified company with PCI DSS accreditation and as such is subject to regular internal and external audit against these standards.

Data security

Capita Travel and Events uses appropriate technical and organisational security measures to protect the personal data of its customers.

Typically, data is stored within our UK based datacentre which houses our internal systems. These are held on our own equipment with no additional access available to any datacentre staff. Physical security controls include 24x7 monitoring, visitor logs and entry passes. Environmental controls include redundant communications and uninterrupted power supplies (UPS).

As a company, Capita Travel and Events works with several third party providers to help provide the best service to our customers. We are putting in place updated terms and conditions with our suppliers to reflect the requirements of GDPR whilst also taking into account the requirements of our customers. We will also require each supplier to put in place equivalent terms and conditions with any sub-processor it may use.

Whilst employing security measures to provide both data confidentiality, integrity and availability it should be noted that no transmission over the internet can be guaranteed as secure from illegal or unauthorised activity and so any personal data supplied is done so at your own risk.

Changes to our privacy policy

Capita Travel and Events reserves the right to revise, amend, or modify this privacy policy at any time and in any manner. If changes are made, the 'Last updated' date will be amended, and we encourage you to regularly check for changes.

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