



Welcome to Mustang Travels' privacy policy.

Mustang Travels is committed to respecting your privacy and protecting your personal data. Our privacy policy aims to inform you, our valued client, as to how we protect your personal data either when you visit our website, or when you provide us personal data via other means, such as over the telephone or via email. Regardless of where you visit our website or talk to us from, this privacy policy will tell you about your privacy rights and how the law protects you.

Should you wish to, you can download a PDF version of our privacy policy [HERE](#). For any terminology you may not fully understand or are unfamiliar with in this policy, please refer to the Glossary that we have set out at the end.

1. WHO WE ARE & IMPORTANT INFORMATION

Purpose of this Privacy Policy

To provide you with information on how Mustang Travels collects, stores and processes your personal data. This includes the data you provide us when you visit our website, speak to us over the phone or via email. It also includes the information you give us when you purchase our travel services, when you make an enquiry through our website forms, when you take part in a competition or request a brochure etc.

Our website is intended for adults and the only exception for which we would ever collect data relating to children, is if you make a travel booking and you have children in your travelling party.

Please read this privacy policy along with any other notice we may provide you on specific occasions when we are collecting or processing personal data about you, to ensure that you are fully aware of how and why we are using your data. This privacy policy is not intended to override any other notices, but to supplement them.

Controller

Mustang Travels Ltd is the controller and therefore responsible for your personal data. Mustang Travels Ltd is collectively referred to as “Mustang Travels”, “we”, “us” or “our” in this policy.

Our Data Protection Officer (DPO) has been appointed and is responsible for overseeing any questions in relation to this privacy policy. Should you have any questions about this policy, including any requests to exercise your legal rights, please contact the DPO using the contact details below:

Full name of legal entity: Mustang Travels Ltd

Name or title of DPO: Robin Aris

Postal address: 35 Sunnyhill Road, Boxmoor, Hemel Hempstead, HP1 1SZ

You are entitled to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please do contact us initially.

Changes to the Privacy Policy and Your Duty to Inform us of Changes

This version was last updated on 25/01/2020.

During the course of your relationship with us, it is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you have provided to us should change.

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 websites and are not responsible for their privacy policies or statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

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

Mustang Travels may collect, store, use and transfer different types of personal data which we have grouped together follows:

Identity Data

Data relating specifically to your identity; e.g. your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

Contact Data

Data relating to how you may be contacted; e.g. your billing address, delivery address, email address and telephone numbers.

Financial Data

Data relating to your means and methods of payment; e.g. your bank account and payment card details.

Transaction Data

Data relating to the transactions you have carried out with us; e.g. details about payments to and from you, and other details of products and travel services you have purchased from us.

Technical Data

This includes more technical data that we may obtain when you make use of our website. For example, your Internet Protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage Data

This includes information about how you use our website, products and services.

Marketing and Communications Data

This includes your preferences in relation to whether or not you want to receive marketing from us and our third parties, as well as your communication preferences.

We also collect, use and share **Aggregated Data**; such as statistical or demographic data, for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used in accordance with this privacy notice.

Special Categories of Personal Data

We collect the following special categories of personal data about you.

Details about your:

- dietary requirements which may disclose your religious or philosophical beliefs; and
- health

We collect and process the above data only when it is absolutely necessary to do so, in order to deliver the travel product and service you have purchased. We will only collect and process the above special categories of sensitive, personal data when you have provided us with your explicit consent to do so.

You are not under any obligation to consent to us processing your sensitive personal data. However, without your consent, we may not be able to make the necessary arrangements to provide the travel services that you have booked or are attempting to book. As a result, if you do not provide your consent, we may be unable to proceed with your booking.

If you are happy to consent to us using and processing your sensitive personal data, you will be able to withdraw your consent at any time. However, this will prevent us or the supplier of your chosen travel service (in bookings where we are acting as the travel agent), from providing the travel product you have booked. We, or the supplier of your chosen arrangements, will be required to treat any withdrawal of consent as a cancellation of your booking and the cancellation charges set out in our 'Booking Terms and Conditions' will become payable.

If You Fail to Provide Personal Data

If you fail to provide personal data when requested - where we need to collect personal data by law, or under the terms of a booking contract we have with you – we subsequently may not be able to perform the contract we have or are trying to enter with you.

Where we are acting as an agent and we need to collect personal data to enter you into a contract with the supplier of your chosen travel arrangements, we may not be able to take steps to enter you into that contract if you fail to provide the data when requested.

If you do not provide us with the necessary details when we require details from you so we can provide you with your chosen travel service and product, we will not be able to provide, or arrange the provision of, the services you have or are attempting to book.

Should this happen, depending upon when you fail to provide the necessary data, we may either not be able to process your booking, or we may have to cancel your booking, in which case we will treat this as a 'cancellation by you' in accordance with our 'Booking Terms and Conditions'. We will notify you if we are unable to process a booking or are required to cancel a booking for this reason.

3. HOW YOUR PERSONAL DATA IS COLLECTED

We will collect your personal data through different methods, such as:

Direct Interactions

You may give us your identity, contact and financial data by filling in forms or by corresponding with us via telephone, email, post or otherwise.

This includes personal data you provide when you:

- Request contact from us via our website
- Subscribe to our e-newsletter or other publications
- Request marketing to be sent to you
- Make a booking of any travel product or service
- Enter a competition, promotion or survey
- Give us some feedback

Automated Technologies or Interactions

We may automatically collect Technical Data about your browsing actions and equipment as you interact with our website.

We may collect this personal data by using cookies and other similar technologies.

Third Parties

We may receive personal data about you from third parties as described below:

- Analytics providers such as Google, based outside the EU
- Advertising networks based inside OR outside the EU

4. HOW WE USE YOUR PERSONAL DATA

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:

- When we need to perform the contract we are about to enter into, or have already entered into with you.
- When we are acting in a travel agent capacity, and we need to take steps to enter you into a contract with the supplier of your chosen travel services.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
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Generally, we do not rely on consent as a legal basis for processing your personal data.

Purposes for Which We Will Use Your Personal Data

We have set out a description below of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose/Activity

To register you as a new customer.

Type of data

(a) Identity; (b) Contact.

Lawful basis for processing including basis of legitimate interest

Performance of a contract with you.

Purpose/Activity

To process and deliver your booking including:

(a) Manage payments, fees and charges; (b) Collect and recover money owed to us.

Type of data

(a) Identity; (b) Contact; (c) Financial; (d) Transaction; (e) Marketing and Communications.

Lawful basis for processing including basis of legitimate interest

(a) Performance of a contract with you;
(b) Necessary for our legitimate interests (to recover debts due to us).

Purpose/Activity

To manage our relationship with you which will include:

(a) Notifying you about changes to our terms or privacy policy; (b) Asking you to leave a review or take a survey.

Type of data

(a) Identity; (b) Contact; (c) Marketing and Communications.

Lawful basis for processing including basis of legitimate interest

(a) Performance of a contract with you;
(b) Necessary to comply with a legal obligation;
(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

Purpose/Activity

To enable you to partake in a prize draw, competition or complete a survey.

Type of data

(a) Identity; (b) Contact; (c) Usage; (d) Marketing and Communications.

Lawful basis for processing including basis of legitimate interest

- (a) Performance of a contract with you;
- (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business).

Purpose/Activity

To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

Type of data

(a) Identity; (b) Contact; (c) Technical.

Lawful basis for processing including basis of legitimate interest

- (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise);
- (b) Necessary to comply with a legal obligation.

Purpose/Activity

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.

Type of data

(a) Identity; (b) Contact; (c) Usage; (d) Marketing and Communications.

Lawful basis for processing including basis of legitimate interest

Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).

Purpose/Activity

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

Type of data

(a) Technical; (b) Usage

Lawful basis for processing including basis of legitimate interest

Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

Purpose/Activity

To make suggestions and recommendations to you about goods or services that may be of interest to you.

Type of data

(a) Identity; (b) Contact; (c) Usage; (d) Marketing and Communications.

Lawful basis for processing including basis of legitimate interest

Necessary for our legitimate interests (to develop our products/services and grow our business).

Purpose/Activity

To monitor our communications with you in order to check any instructions given to us, for training purposes, for crime prevention, to improve the quality of our customer service and to defend legal claims.

Type of data

(a) Identity; (b) Contact; (c) Technical

Lawful basis for processing including basis of legitimate interest

- (a) Necessary for our legitimate interests (to assist us in training our employees and defend our business in the event of a claim).
- (b) Necessary to comply with a legal obligation;

Purpose/Activity

For the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

Type of data

- (a) Identity; (b) Contact; (c) Financial; (d) Transaction; (e) Technical; (f) Usage; (g) Marketing

Lawful basis for processing including basis of legitimate interest

Necessary for our legitimate interests (protection and assertion of our legal rights, your legal rights and the legal rights of others).

Purpose/Activity

For the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice.

Type of data

- (a) Identity; (b) Contact; (c) Financial; (d) Transaction; (e) Technical

Lawful basis for processing including basis of legitimate interest

Necessary for our legitimate interests (the proper protection of our business against risks).

Marketing and Promotional Offers From Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data that you have provided to us as a result of a purchase of travel services or other such transactions.

Monitoring Communications

We may monitor, record, store and use any telephone, email or other communication with you in order to check any instructions given to us, for training purposes, for crime prevention and to improve the quality of our customer service.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of Purpose

We will only use your personal data 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 data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the following parties for the purposes set out in the above list in Section 4.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Some of our external third parties are based outside of the European Economic Area (EEA). Therefore, their processing of your personal data will involve a transfer of data outside of the EEA.

Where you have requested a booking for travel arrangements which are located or otherwise due to be fulfilled outside the EEA, we will have to transfer your personal data to the suppliers fulfilling or providing those travel arrangements outside the EEA in order to make your booking and for those suppliers to be able to provide you with the travel arrangements you have booked. Where we are unable to rely on one of the safeguards outlined below when transferring data to those suppliers outside the EEA, we will rely on the derogation under Article 49 of the GDPR in order to transfer your personal data to countries outside the EEA (as the transfer relates to the performance of a contract for your benefit), and you hereby permit us to do so. You also acknowledge that where your personal data is transferred outside the EEA, controls on data protection may not be as wide as the legal requirements within the EEA.

For all other transfers of data, whenever your personal data is transferred outside the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries.](#)
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries.](#)
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield.](#)

7. DATA SECURITY

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

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

8. DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. This includes for the purposes of satisfying any legal, regulatory, tax, 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, and the applicable legal regulatory, tax, accounting or other requirements. We will review periodically the information we hold and delete it securely, or in some cases anonymise it, when there is no longer a legal, business or customer need for it to be retained. Should you stop interacting with us as a client, we will remove or anonymise your information after 7 years.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data under certain circumstances. Please go to the Glossary set out at the end of our privacy policy to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

Should you wish to exercise any of the rights listed above, please contact us.

No Fee Usually Required

You will not have to pay a fee to access your personal data, or to exercise any of the rights above. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What We May Need From You

To help us confirm your identity and ensure your right to access your personal data we may need to request specific information from you. This is one of our in-place security measures to ensure that your personal data and personal information is not disclosed to any person who has no right to access it. We may also contact you to ask you for further information in relation to your request so to speed up our response.

Time Limit to Respond

We try to respond to all legitimate requests within one month. On occasion it may take us over a month if your request is particularly complex, or if you have made a number of different requests. In this case, we will endeavour to notify you and keep you updated.

10. GLOSSARY

Lawful Basis

Legitimate Interest

Means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider

and balance any potential impact on you (both positive and negative), and your rights, before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to do so by law).

Performance of Contract

Means processing your data where it is necessary for the performance of a contract to which you are a party to, or to take steps at your request before entering into such a contract.

Comply with a Legal or Regulatory Obligation

means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Third Parties

Internal Third Parties

Other companies in the Mustang Travels Ltd group acting as joint controllers or processors and who are based in the UK and Ireland and provide IT, service delivery and system administration services and undertake leadership reporting.

External Third Parties

(i) Suppliers of travel services acting as processors based in the country that you are travelling to and who provide the travel services that make up any booking of travel services that you make with us.

(ii) Service providers acting as processors based in the United Kingdom who provide IT and system administration services.

(iii) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Your Legal Rights

You have the right to:

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 the 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 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 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. Please be aware, however, that 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

Of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- (a) if you want us to establish the data's accuracy;
- (b) where our use of the data is unlawful, but you do not want us to erase it;
- (c) 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; or
- (d) 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 to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, 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.