

## 1. Information about us

Alan Rogers Travel Limited, trading as **Belle France**, is the owner and operator of [www.bellefrance.com](http://www.bellefrance.com) (our **website**) and any applications and/or digital channels provided by us for the purpose of accessing our website.

We are a company limited by share capital registered in England and Wales under company number 3676532.

Alan Rogers Travel Ltd is a subsidiary of The Caravan Club Ltd.

Our registered company address is: Belle France, C/o The Caravan Club, East Grinstead House, East Grinstead, West Sussex RH19 1UA United Kingdom.

Our VAT number is 724 6700 42.

ABTA Bonded - Membership No. P7119 - Y6434

ATOL No. 11309

## 2. Contact us

If you would like any information about Belle France and our activities you can contact us by telephone on +44 **(0)1580 214 010** or email [enquiries@bellefrance.com](mailto:enquiries@bellefrance.com). You can also write to Belle France at Spelmonden Old Oast, Goudhurst, Kent TN17 1HE United Kingdom. If you have any queries relating to this Privacy Policy, our Use of Cookies policy or Terms of Use, please contact the Data Protection Officer by letter at the address above or email [DPO@bellefrance.com](mailto:DPO@bellefrance.com).

A list of contact telephone numbers and email addresses can be found on our website on our [Contact us](#) page.

Thank you for using our website.

## 3. Privacy Policy

### 3.1. Our policy

Belle France (**We**) are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our policy and practices regarding your personal data and how we will treat it. By visiting our website you are accepting and agreeing to the practices described in this policy.

For the purpose of compliance with UK data protection law, the data controller is Alan Rogers Travel Limited and the Data Protection Officer is our nominated person for data protection.

### 3.2. How do we collect information?

Your personal data, that is any information which identifies you, or which can be identified as relating to you personally, for example, and not limited to: name, address, phone number, email address, will be collected and used by us.

We obtain personal information from you when you enquire about our activities, send or receive email, purchase a holiday, review a holiday, ask a question or otherwise provide us with personal information. We may also receive information about you from third parties, for example, our service providers or from a friend who wants to tell you about our website.

We collect personal data in connection with specific activities such as: booking holidays and conducting research.

Examples of ways that you may share your personal data with us are by:

- completing electronic and paper forms
- subscribing to our newsletter
- subscribing to take part in research on our website or other social media functions on our website
- entering a competition, promotion or survey
- corresponding with us by phone, email, social media or letter
- buying services from us, e.g. booking a holiday
- reviewing your holiday

We will inform you at the point of collection what the purpose of the data processing is and provide you with the relevant information to access this Privacy Policy.

Children aged under 18 may be included on family holiday bookings by the lead passenger and we collect names and dates of birth for certain travel bookings. We don't include children in our marketing communications.

### **3.3. What information do we collect?**

The personal information we collect will depend on the nature of the data processing requirement. For example, it might include name, date of birth, email address, postal address, telephone number and bank account details, details of services we provide to you such as holiday bookings, information about your interests, and material that you submit to us for publication. Although we may take credit/debit card information to complete a transaction, we do not store this information.

Certain personal information is categorised by UK data protection law as 'special category data'. In some situations we process special category data about you, for example information about your health or dietary requirements

We also gather general information about the use of our website, such as which website pages users' visit most often and which services, events or facilities are of most interest. We may also track the pages users visit when they click on links in emails and we may use this information to personalise the way our website are presented when users visit them, to make improvements to our website and to ensure we provide the best service for users. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our website. For more information on this, please see our [Use of Cookies](#) policy.

### 3.4. How do we use this information?

Depending on your relationship with us, we will use your personal information for the following purposes:

- to provide you with the services or information you have requested
- to provide information to you about us and the services provided by us
- to enable you to transact within certain areas of our website and perform activities such as making a holiday booking or completing enquiry forms
- for general administration purposes, such as handling your enquiries and managing purchases of products and services
- to carry out research into the market for our goods and services
- to guide and support the general objectives of Belle France
- statutory and regulatory compliance

As part of this, we may analyse the personal information we collect to create a profile of your interests and preferences so that we can contact you in the most appropriate way and with the most relevant information.

We may need to share your information with our service providers, associated organisations and agents for the purposes described above but we never sell your information to other organisations.

### 3.5. Cookies

Our website use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our [Use of Cookies](#) policy.

### 3.6. Processing your personal data for analytics

We know it is important to our website visitors to provide the best, tailored service possible. To help us do this, we use automated profiling and targeting to understand our customers' requirements and make sure that:

- our communications (e.g. emails/brochures) and services (e.g. our website) are relevant and interesting to you, and
- our services meet the needs of our customers

To do this we'll analyse how you interact with us on our website, through use of data from bookings and by using both geographic and demographic data to better understand your interests. We use specific tools, such as Google Analytics, to look at how you interact with us online. Much of the information we collect is aggregated, however we may also collect some personal data for the use of personalising your experience, optimising our marketing campaigns, and to ensure the website site is functioning as intended.

### 3.7. How we use personal data to conduct research

We occasionally carry out research to generate feedback on your experiences with us. We use this feedback to improve the experiences that we offer and ensure we know what is relevant and interesting to you. If you choose to take part in research, we'll tell you when you start what data we will collect, why and how we'll use it. All the research we conduct is optional and you can choose not

to take part. We may share your personal data, e.g. contact information, to a third party data processor who will carry out research on our behalf, but only for the purpose explained here.

### **3.8. How do we protect your personal information?**

All pages within our website are protected by encryption and we process payments offline via a secure third party payments service. We take appropriate measures to safeguard personal information that is disclosed to us and keep it secure, accurate and up to date. We utilise established market leading services for many of our processing activities which are compliant with stringent privacy and security standards based on industry best practices.

### **3.9. How do we store your information, and do we send it outside the European Economic Area?**

Our operations are based in the UK and we store most of our data on secure cloud based services. Some organisations which provide services to us may transfer data outside the European Economic Area but we only allow this if your data is adequately protected.

To protect your data when it is transferred outside the European Economic Area we will either:

- put in place contract clauses approved by the European Commission or the relevant data protection regulator to protect your data;
- ensure that the country that the data is transferred to has been approved as adequate for data protection by the European Commission; or
- ensure the one of the other safeguards set out in the relevant data protection laws is in place.

Sometimes it may be necessary for us to transfer data out of the European Economic Area without us being able to put these safeguards in place. We will only do this where the law permits, for instance if the transfer is necessary to perform a contract with you.

### **3.10. Will we disclose the information we collect to third parties?**

As indicated above, we may pass your information to our service providers, agents and associated organisations for the purposes explained above.

We share information with other data controllers and instructed data processors. Categories of recipients normally include:

- accommodation providers (hotels, guest houses etc.)
- overseas travel and ferry companies (SNCF, Eurostar, local taxi companies, etc)
- local agencies (bike hire companies)
- social media hosting services
- communication distribution and marketing companies
- third party retail suppliers
- financial transaction providers
- infrastructure service providers
- cloud service providers
- data storage, redaction and destruction partners
- sub-contractors we appoint to provide services to you, for example luggage transfer services.

We may also need to disclose your information if required by law, for example to government bodies and law enforcement agencies, or if we have your permission to do so.

We will not sell any personal data or your web browsing activity to a third party.

### **3.11. Links to other websites**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we don't accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This Privacy Policy applies solely to the personal data collected by Belle France.

### **3.12. What is the lawful basis for processing personal data at Belle France?**

Collecting, processing and using personal data is permitted only under a lawful basis. The lawful bases that Belle France operates under are listed below, along with the data processing activities that fall under them.

#### **(a) Necessary for the performance of a contract**

When you become a customer and provide us with your personal data, certain processing activities are considered necessary for the performance of the contract between you and Belle France. This includes activities such as booking a holiday.

When you buy a holiday from us we will process your personal data where this is necessary for us to provide you with this service, including by sharing your data with third parties involved in providing the services to you.

#### **(b) Legitimate interests**

We will contact you with offers and services which we feel are relevant. This includes informing you of products and services provided by Belle France and our trusted business partners, such as overseas travel offers. The lawful basis with which we use your personal data in this way is legitimate interests. This is because on balance, and taking account of your own interests, we have determined that the data processing is necessary for the legitimate business interests of Belle France and to provide you with appropriate offers and services. You can object to being contacted for marketing purposes and manage your preferences by unsubscribing from our emailing list or by contacting us directly (please refer to section 3.14 for more information about this).

We also process your data where this is necessary for our administration of our business and to manage our relationship and correspondence with you, on the basis that we have a legitimate interest in doing this.

#### **(c) Legal obligations**

There are circumstances when we are required to process personal data in order to meet our legal obligations. Processing data under this basis can relate to financial data and HMRC reporting requirements. When processing on the basis of legal obligations, you have no right to erasure or right to object.

#### **(d) Consent**

Where Belle France relies on the lawful basis of consent to process personal data, it must be freely given, specific, informed, and must be an unambiguous indication of agreement. For example, we may require your consent in order to market products and services to you if you have not previously granted us consent. If you have provided consent you have the right to withdraw it at any time. We

would require your consent to process special category data unless processing data under the lawful basis of protecting vital interests or it is necessary for the performance of a contract.

(e) Protecting vital interests

Dependent upon which the services you have purchased from us, we may need to inform a third party of your situation, for example if you become ill whilst abroad. In these circumstances we would share this information with emergency services and we would consider this type of processing as being necessary to protect your and other relevant individuals' vital interests.

### **3.13. What is the lawful basis for processing special category data at Belle France?**

When we process special category data we rely on one of the lawful bases outlined above as well as one of the following legal bases, which apply to special category data:

(a) Your explicit consent

In some circumstances, we provide you with the opportunity to voluntarily inform us of your special category data, e.g. whether or not you have a disability, so that we can help you with the allocation of appropriate accommodation. In these situations if you choose to provide the information we rely on your explicit consent as our basis for processing.

Please note that if we need your consent to process special category data in order to provide a service and you decide not to give consent or you later withdraw consent we may not be able to provide the service.

(b) Where processing is necessary for establishing, exercising, or defending legal claims

If it is necessary for us to process your special category data to establish, exercise, or defend a legal claim. This could happen, for instance, if there is a legal claim relating to a holiday booking you have made with us.

### **3.14. What are my data subject rights?**

Under UK data protection law, a data subject is considered to be 'an individual who is the subject of personal data'. Data subjects have certain rights and by exercising these rights, you can make requests regarding your personal data to Belle France. A summary of these rights is explained below.

The Supervisory Authority that regulates and enforces data protection law in the UK is the Information Commissioner's Office (ICO) and additional information and guidance about these data subject rights can be found on their website as follows <https://ico.org.uk/>.

1) Right to be informed

At the point of collecting personal data from you, Belle France must provide you with information such as the purpose and rationale for the processing of that data.

2) Right of access

This right provides you with the ability to access to your personal data that is being processed Belle France. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your requested personal data. The information will be provided free of charge unless the request is manifestly unfounded or excessive; in those cases, the request may be refused or a reasonable fee charged.

### 3) Right to rectification

This right provides you with the ability to ask for modifications and rectification to your personal data in the event you believe that your personal data is not up to date or accurate.

### 4) Right to erasure

Also known as 'the right to be forgotten' this right, under certain circumstances, provides you with the ability to ask for the deletion of your personal data. We may refuse to fulfil the right to erasure if there is legal reason why the personal data must be retained, the grounds are not valid or if the data is required for use in the defence of a legal claim.

### 5) Right to restriction of processing

You have the right to restrict the processing of your personal data where you have a particular reason for wanting the restriction. This may be because you have concerns with the personal data that Belle France holds about you or how we have processed your data. In most cases we will not be required to restrict your personal data indefinitely, but will need to have the restriction in place for a certain period of time.

### 6) Right to data portability

This right provides you with the ability to ask for a copy of or a transfer of your personal data, in a certain format. You may ask for your personal data to be provided back to you or transferred to another data controller. When doing so, the personal data must be provided or transferred in a structured, commonly used and machine-readable format.

### 7) Right to object

You have the right to object to Belle France processing your personal data, including marketing activities and profiling, on grounds relating to your particular situation. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

### 8) Right to object to automated processing

This right provides you with the ability to object to a decision based solely on automated processing, including profiling. Under this right, you may ask for your processing to be reviewed manually and with human intervention.

## 3.15. Exercising your data subject rights

In order to make a request we will require the following information.

- Evidence that you are the Data Subject (a document to verify your name. Examples of appropriate documents are: driving licence, passport, birth/adoption certificate or marriage certificate)
- The request type:
  - Right of access
  - Right to rectification
  - Right to erasure
  - Right to restrict processing
  - Right to data portability

- Right to object
- Right to object to automated decision making
- Title, first name & last name
- Email address
- Contact phone number
- Full address (including postcode)
- Request details

Please submit the relevant information to the Data Protection Office ([DPO@bellefrance.com](mailto:DPO@bellefrance.com)) for review. We may request further information from you to help us verify your identity. We will need all the information asked for above in order to process your request.

Once we have all the information necessary to respond to your request and have confirmed your identity, we'll provide the information to you without undue delay and in any event within one calendar month. Note that this timeframe may be extended by two further months if your request is particularly complex or there is a large volume of requests.

### **3.16. How long does the Belle France keep personal data for?**

We retain personal data for no longer than is necessary. What is necessary will depend on the circumstances of each data type, taking into account the reasons that the personal data was obtained, but if relevant, the length of retention is determined in a manner consistent with legal and regulatory obligations.

We have prepared a data retention policy that sets out detailed retention period for the different kinds of data we might hold about you. To request a copy of that policy please contact our Data Protection Officer using the contact details at the start of this policy.

### **3.17. Managing your preferences**

You have a choice about whether you want to receive information about our services. We will not use your personal information for marketing purposes or share your information with any third party if you have indicated that you do not wish to be contacted in this manner.

You can change your marketing preferences by:

- Clicking on the 'unsubscribe' link at the bottom of every marketing email we send you.
- Returning any postal communications to us, marked 'return to sender, please remove'
- Speaking to us on +44 (0)1580 214 010 – Let us know what marketing materials you no longer wish to receive.
- Contacting our Data Protection Officer using the contact details at the start of this policy.

### **3.18. Payment card security**

Belle France is compliant with the Payment Card Industry Data Security Standard (PCI DSS). This is the international standard for secure credit and debit card payment processes and means that when you pay for goods or services from Belle France using a debit or credit card, the relevant technical and operational security requirements are in place to protect the account data.

### **3.19. Making a complaint**

If you think your data has been misused or that we haven't kept it secure, please contact us using the contact details provided in section 2 and we will investigate any concerns you may have. If you are



unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO).

The telephone number for the ICO Helpline is +44 (0)303 123 1113 or you can also [chat online with an advisor](#).

The ICO can investigate your claim and take action against anyone who has misused personal data. You can also visit their website for information at <https://ico.org.uk/concerns/>.

### 3.20. Tell us about changes to your information

If your personal details change, please help us keep your information up to date by notifying us at: Belle France, Spelmonden Old Oast, Goudhurst, Kent TN17 1HE United Kingdom, or by emailing [enquiries@bellefrance.com](mailto:enquiries@bellefrance.com).

### 3.21. Changes to this Privacy Policy

We will amend this Privacy Policy from time to time to ensure it remains up to date and reflects how and why we use your personal data as well as any new legal requirements. Please visit our website to keep up to date with any changes as the current version of this policy will always be posted on our website.

Version no.	Description of change	Date published
1.0	ABTA Membership Update	24 April 2017
2.0	Major update to original policy – GDPR	30 May 2018
2.1	Minor amends	31 May 2018

### 3.22. Monitoring of telephone calls

Your telephone calls to us may be recorded and monitored for quality control and regulatory purposes.

### 3.23. Last update

This Privacy Policy (Version 2.1) was last updated on 31 May 2018.