

This document forms part of the [Privacy Policy](#)

## Legal Basis for collecting and processing data

### Necessary to fulfil our contractual obligations to you

- Delivering services you request, for example a holiday booking
- Processing your job application
- Personalising your experience
- Communicating with you on, for example, service-related issues
- Sharing with vendors and service providers
- To transfer, transmit, store or process your data outside the EEA (excluding marketing - see Your consent)

### Your consent

- Marketing communications and newsletters
- To transfer, transmit, store or process your data outside the EEA for marketing purposes e.g. email marketing via HubSpot
- Improving the efficiency of our marketing and advertising and sharing with advertising (and analytics) partners. (We offer both a “catch-all opt-in” approach and a opt-in approach through our cookie banner rather than a longer more interruptive and explicit approach to gaining your consent. The justification for this is that we minimise the impact to you by only using networks who:
  - gain your consent before they show you targeted adverts and offer opt-outs (e.g. Google and Facebook)
  - process the data in ways that do not give us further personal data about you
  - controlling the number of times you may see our adverts to prevent unreasonable irritation
  - being transparent in our privacy policy and on our website that your data may be used in this way

### Our legitimate interests or the legitimate interests of a third party, where not outweighed by your interests or fundamental rights and freedoms

- Product research and development (justification: collecting the data and then processing the data anonymously or pseudo anonymously does not interrupt you (unless you consent) or take away from the experience of using our services but provides significant potential benefit to us, you and future customers)
- Statistical purposes
- Non-financial third party services on our website (Justification: although many of these services provide part of our overall service for your direct benefit, we realise that data is collected about you by these third parties. We believe the price of that is massively outweighed by the cost savings in not developing the services ourselves and indeed, even if we did, there are potentially other advantages to you from us doing this (e.g. it could help YouTube provide better video recommendations to you if you are a registered user)
- Sharing/transferring to any potential new owner of the business

### Compliance with a legal obligation

- Data for legal purposes

### Tasks carried out in the public interest

- Providing anonymous but public data to the holiday industry and other public bodies