



## Data Privacy Policy

### Who are we

In this privacy policy references to “we”, “us” and “our” means **COGO Travel**, a trading name of *USIT Ireland Ltd, USIT Building, 19-21 Aston Quay, Dublin 2, D02 VX22*. References to “our Website” or “the Website” apply to the above trading name.

### What information do we collect?

#### Your Information

Refers to information we collect via our various website(s)/apps and information given to us by you, about you or on behalf of those you represent. Your information is collected when you request information from us, contact us (and vice versa), make a booking, use our website(s)/apps, link to or from our website(s)/apps, connect with us on social media and any other engagement we or our business partners have with you. This may include information such as your name, contact details, IP address, travel preference including special needs/disabilities/dietary requirements that you supply us or is supplied to us. This may also include social preferences, interest, activities and any other information about persons you represent (such as those on or involved with the booking.) You are responsible for ensuring that other members of your party are aware of the content of our Privacy Policy and consent to your acting on their behalf in all your dealings with us. We will update your information whenever we can to keep it current, accurate and complete.

#### Our use of your information

1. For the purpose of providing you with our services, including your flight, holiday or insurance, etc., we may disclose and process your information outside the EEA/UK or an international organisation. In order for you to travel abroad, it may be mandatory (as required by government authorities at the point(s) of departure and/or destination) to disclose and process your information for immigration, border control, security and anti-terrorism purposes, or any other purposes which they determine appropriate. These requirements may differ depending on your destination and you are advised to check. Even if not mandatory, we may exercise our discretion to assist where appropriate. If you fail to provide us with this information we may not be able to process your booking correctly and the onus will be your responsibility only.
2. We may collect and process your information for the purposes set out in accordance with the Data Protection Commissioner, and disclose the same to our group of companies for business purposes and also to companies and our services who act as “data processors” on our behalf, or to our service providers operating systems or business functions on our behalf (some of whom are located outside the EEA/uk or an international organisation). These business purposes include administration,



providing services (and contacting you where necessary), customer care, service quality, business management and operation, re-organisation/structuring/sale of our business (or group companies), risk assessment, security, fraud and crime prevention/detection, monitoring, research and analysis, social media, advertising and marketing, loyalty programmes, profiling customer purchasing preferences and trends, dispute resolution, credit checking and debt collection.

3. Information (such as health or religion) may be considered “sensitive personal data” under the GDPR Act 2018. We collect it to cater to your needs or act in your interest, and we are only prepared to accept sensitive personal data on the condition that we have your positive consent. By booking with us you also agree for your insurers, their agents and medical staff to disclose relevant information and sensitive personal data to us in circumstances where we need to act on your behalf or in the interest of passengers or in an emergency.

If you do not agree to Our Use of Your Information above, we cannot do business with you or accept your booking. All personal data will be processed & transported securely.

### **Marketing Material**

We may contact you from time to time with information on offers of goods and services, brochures, new products, forthcoming events or competitions, reward schemes. We will tailor the information you receive or see. This will enable us to make available to you more personalised and relevant communications. We may use innovative technologies and work with business partners to achieve this. Our websites will assume you to agree to e-communications and direct mail when you input your details.

If do not wish to receive such information or would like to change your preference, please refer to point (2) of “Your Rights” below. We never pass your details on to 3rd parties for marketing purposes.

### **Use of Tools**

If you receive our email marketing, we will tailor the information we send you unless you tell us not to. You will be given the opportunity on every communication to opt-out.

To help you understand more about please see our cookies policy or the below links:

### **Google Analytics**

By using our website(s), you consent to us using the above-mentioned tool. Our website(s) may contain links to other sites not controlled by us. It is your responsibility to check the status of these sites.

### **Your Rights**

You are entitled to a copy of the information we hold about you and to correct any inaccuracies.



You have the right to ask in writing not to receive direct marketing material from us. You can use our “unsubscribe” link on our emails or refer to our literature containing instructions on how to do this. Once properly notified by you, we will take steps to stop using your information in this way. If you want to unsubscribe to all our companies’ literature, please email [info@cogotravel.ie](mailto:info@cogotravel.ie) or [info@cogotravel-ni.co.uk](mailto:info@cogotravel-ni.co.uk) This would normally be free of charge unless the request is deemed to be excessive.

By booking with COGO Travel you give consent for photography/video and any written testimonial (to be) taken of the party (including students) to be used within marketing materials; printed publications, websites - including social media such as but not restricted to Facebook, Twitter, Instagram and YouTube. If you wish your party, or any member of your party to be excluded, please contact [info@cogotravel.ie](mailto:info@cogotravel.ie) or [info@cogotravel-ni.co.uk](mailto:info@cogotravel-ni.co.uk)

### **Foreign Controls**

Outside the European Economic Area (EEA), note that controls on data protection in such countries may not be as strong as the legal requirements in this country.

### **Monitoring**

To ensure that we carry out your instructions accurately, improve our service and for security and fraud, we may review, monitor and/or record telephone calls, activities using CCTV in and around our premises, transactions and activities at all points of contact and web, social media and app traffic, activities, etc. All recordings and derivative materials are and shall remain our sole property.

### **Cookies**

Cookies are text files placed on your computer to collect standard internet log information.

### **Security Statement**

We have taken all reasonable steps and have in place appropriate security measures to protect your information.

### **Other Websites**

Our website may contain links to other websites. This Privacy Policy only applies to our website so when you link to other websites you should read their own Privacy Policy.

### **Storage**

Your data will be kept for the duration of the booking required to process the booking and any personal data will be kept up to an approx. 3 years after the date of return.

### **Changes to this policy**

We keep our Privacy Policy under regular review and we will place any updates on this web page. This Privacy Policy was last updated 24th May 2018.



**Contacting us**

If there are any questions regarding this privacy policy, please contact us using the information below:

Data Compliance Officer  
COGO Travel  
USIT Building  
19-21 Aston Quay  
Dublin 2  
D02 VX22

ROI: 01 473 3350, [info@cogotravel.ie](mailto:info@cogotravel.ie).

NI: 028 9002 2367, [info@cogotravel-ni.co.uk](mailto:info@cogotravel-ni.co.uk)