



## Legal

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### Registered company

#### **Capita Travel and Events**

Registered Office:

30 Berners Street

London

W1T 3LR

Registered in England no: 01094729

VAT no: 618184140

Email address: [travevents@capita.co.uk](mailto:travevents@capita.co.uk)

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without authority or expropriate any system, data or personal information as defined in the Data Protection Act 1998.

This site is intended normally to be available 24 hours a day and 7 days a week. BSI will not be liable for any failure to achieve this level of availability.

The site may be suspended temporarily and without notice in circumstances of system failure, maintenance or repair or for reasons beyond the control of Capita plc.

You agree to fully reimburse Capita plc in respect of all losses, costs, actions, claims, and liabilities incurred by Capita plc or its affiliates as a result of any breach or non-observance by you of these terms or any data submitted by you to us.

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At various points throughout the site you may be offered automatic links to other internet sites relevant to a particular aspect of this site. This does not indicate that Capita plc or affiliates are necessarily associated with any of these other sites or their owners. While it is the intention of Capita plc that you should find these other sites of interest, neither Capita plc nor affiliates nor their employees shall have any responsibility or liability of any nature for these other sites or information contained in them.

These terms shall be governed by and construed in accordance with English Law and each party to these terms submits to the exclusive jurisdiction of the English Courts.

## Privacy policy

We take care to protect your privacy when using our website, or our company services. Here is an explanation of how we process information.

### [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.

At BSI 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.

#### 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.

BSI, 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.

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## Your data

### Data ownership

BSI 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 collect

For the purpose of providing travel and event services, BSI 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 BSI can be assured that BSI 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 BSI's customer as the data controller, for the purpose of management information, auditing, tracking and other purposes as necessary. BSI 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).

### 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

BSI 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.

Should this state BSI 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

BSI 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, BSI 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

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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.

### **Collection of personal information**

The information which we collect and store during normal use of the site is used to monitor and analyse how parts of the site are used. Such use does not result in any personally identifiable data being collected or stored. 'Personal information' means information from which someone else would be able to identify you as an individual.

You have the option on certain pages within this site to submit personal information to BSI, a specialist brand of Capita Travel and events Limited, part of Capita plc in order that we might respond to you. In each case, we will only use the information about you for the purpose for which you provide it.

If you have submitted personal information through this website and wish to have your details removed, or stop receiving communications from BSI, please contact [travelevents@capita.co.uk](mailto:travelevents@capita.co.uk).

Personal information you submit on BSI website is stored on secure servers

Occasionally, in order to complete your request as outlined above, we may need to transfer personal information you submit to us to countries or jurisdictions outside the EEA. In each case, we ensure that our suppliers provide adequate protection for the rights of data individuals in connection the transfer of their personal data.

Currently, we expect all suppliers to use the standard contractual clause approved by the European Union or be subject to the Privacy Shield scheme in the United States. We will never sell or share your personal information with other organisations for their direct marketing purposes.

BSI site does not automatically capture or store personal information, other than logging the user's IP Address or the location of your computer or network on the Internet, for systems administration and troubleshooting purposes. (If you are connected to the Internet you have an IP address, for example, an IP address might read "154.198.99.9"). We also use IP addresses to track visitor pages in order to improve the quality of the site.

### **Google Analytics**

We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on.

This Analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are.

We have also implemented Google Analytics Demographics and Interest Reporting. This is used to gain an insight into the age, gender and interests of our users to help us make decisions on how to improve the website in the future. Users can opt out of this reporting by visiting [Google Ads Settings](#).

You can find out more about Google's position on privacy as regards its analytics service at <https://support.google.com/analytics/answer/6004245?hl=en-GB>

Visitors may choose to opt-out of Google Analytics tracking with the [Google Analytics opt-out browser add-on](#).

Read about [how we use Cookies on our website](#).

### **Changes to our privacy policies**

BSI reserves the right to revise, amend, or modify these privacy policies at any time and in any manner. When we post changes to them, we will amend the 'Last updated' date, and we encourage you to regularly check for changes.

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## Modern Slavery Act

This statement covers the activities of all businesses in all jurisdictions within the Capita plc group of companies, including BSI and is our Modern Slavery statement for the financial year ended 31 December 2017 required under the provisions of the Modern Slavery Act 2015 (the “Act”).

[Download statement](#)