

## Privacy and Cookie Policy

This is our CURRENT Privacy Policy and was Last Revised on the 21 of December 2022.

Road.Travel respects your privacy and is committed to protecting your personal data. Please read this privacy and cookie policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data and cookie data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities should you need to. Please retain a copy for your records. This policy forms part of our Terms and Conditions.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to and comply with the UK General Data Protection Regulation (UK GDPR), the UK Data Protection Act 2018, General Data Protection Regulation, Regulation (EU) 2016/679 (EU GDPR), any laws which implement, replace, extend, re-enact, consolidate or amend such laws, and any other applicable laws.

This policy aims to provide you with information on how we collect and process your personal data through this website, [<https://frommers.road.travel/>], when we interact with you to provide you with our products and services or otherwise throughout the course of our dealings with you.

### Who we are

This website is operated by Timescenery Ltd, with registered address 7 Henrietta Street, London, WC2E 8PS, United Kingdom, a company registered in England and Wales under company number 10783487, (referred to as "Road.Travel", "we", "us" or "our" in this privacy policy). We are the data controller responsible for your personal data and the company responsible for this website.

If you have any questions about this privacy and cookie policy, including any requests to exercise your legal rights, please contact us using the details set out below (see '**How to contact us**' below).

### Personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). A data subject is the individual who the personal data relates to.

We may collect and use the following kinds of personal data about you (some of which is subject to you choosing to provide us with it):

- **Identity Data** including your first name, last name, and photograph (if you choose to provide it) and other registration information.
- **Contact Data** including your city of residence, email address and mobile phone number.
- **Financial Data** including your bank account and payment card details.

- **Transaction Data** including details about payments to and from you and other details of products and services you have purchased from us and if you are a creator as defined in our Terms and Conditions, to be able to make payment to you.
- **Technical Data** including the type of device (mobile, smartphone, tablet or any other electronic device) you are using when you visit the Platform, the temporary or persistent unique device identifiers (UDIDs) placed by us or our service providers, the unique identifier assigned by us to your device, the I.P. address of your device, your mobile operating system, the type of mobile internet browsers you use and data about the way you use our website (Device Information), information about your visit, including the full uniform resource locators (URL) clickstream to, through and from the website (including date and time); Services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), consultation length(s), recurrence of visits and other interaction information, methods used to browse away from the page and any phone number used to call our customer service number (Website Information), details of your use of the website including, but not limited to, traffic data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access (Log Information).
- **Profile Data** including your username and password, account date, purchases or orders made by you, profile city, profile bio, your interests, preferences and dislikes, feedback, ratings and reviews and survey responses (where not anonymised by you), data from your social media platforms (such as social networking sites including but not limited to Facebook, LinkedIn, Google, Twitter, Instagram, Pinterest, WhatsApp, Telegram and VK).
- **Usage Data** including information about how you use our website, products and services, click movements, browsing time and details.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.

We collect and use this personal data to provide products and services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing such products and services to you.

This website is not intended for children, and we do not knowingly collect data relating to children.

### **How your personal data is collected**

We use different methods to collect data from and about you including through:

- **Direct interactions.** We may collect your data through your filling in forms, submitting or uploading information to our website, contracting with us to receive our services, signing up to be a member traveller or a creator to create itineraries and road trip routes or you corresponding with us through our website, social media, by phone, email or otherwise. This includes personal data you provide when you:

- o purchase or subscribe for our products or services;
  - o book travel services;
  - o create an account on our website to become a member;
  - o create an account on our website to become a creator in order to provide services by creating itineraries and road trip travel guides;
  - o log in to our website;
  - o request marketing to be sent to you;
  - o fill in an application or other forms;
  - o enter a competition, promotion or survey;
  - o provide your feedback; or
  - o contact us.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect data about your equipment, browsing actions and patterns. We collect this data by using cookies and other similar technologies. Please see the section on Cookies below for further details.
  - **Third parties or publicly available sources.** We may receive personal data about you from various third parties as set out below:
    - o if you choose to create your profile using your social media profiles, we will collect your personal data through this third party platform;
    - o analytics provider, such as Google
    - o through automated monitoring of our websites and other technical systems, such as our computer networks and connections, access control systems, communications systems, email and instant messaging systems
    - o your bank or building society
    - o your parent or guardian if you are under 18 years old

**How and why 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:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract to make available our services and products or if you are a creator, to be able to receive your services; or
- 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.

The table below explains what we use your personal data for and why.

| What we use your personal data for | Our reasons |
|------------------------------------|-------------|
|------------------------------------|-------------|

|  |   |
|--|---|
| Providing products and services to you and to send you essential information about the Services  | To perform our contract with you or to take steps at your request before entering into a contract   |
| To register you and set you up as a new member/user and to allow you to then interact with our website for the provision of our services to you by us or by our distributors and/or collaborative partners   | To perform our contract with you<br><br>For our legitimate interest to enable us to better match you with the appropriate services that we may be able to offer to send to you  |
| To register you and set you up as a creator and to allow you to provide services by creating itineraries and road trip routes and to be able to make payment to you in return for the services   | To perform our contract with you  |
| Validating your account and/or to reset your username and password if required and management of your account with us  | To perform our contract with you  |
| Operating and improvement of the website and to ensuring that content from the website is presented in the most effective manner for you and your computer or device   | To effectively perform our contract with you<br><br>For our legitimate interests i.e. to make sure we can deliver the best service to you and respond to you when you need us   |
| Preventing and detecting fraud against you or us   | For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us   |
| Conducting checks to identify our customers and verify their identity<br><br>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator | To comply with our legal and regulatory obligations<br><br>For our legitimate interests or those of a third party, i.e. to minimise fraud and to prevent consumers registering more than one membership in order to exploit our services. |
| Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies  | To comply with our legal and regulatory obligations   |
| Management of your accounts with us  | To perform our contract with you  |
| Customer service and responding to any queries you raise with us and to provide customer support   | To effectively perform our contract with you<br><br>For our legitimate interests i.e. to make sure we can deliver the best service to you and respond to you when you need us   |

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| Management of promotions or competitions that you choose to enter   | To perform our contract with you<br><br>For our legitimate interests or those of a third party, i.e. to study how customers use our products/services, to develop them and grow our business   |
| Ensuring business policies are adhered to, e.g. policies covering security and internet use   | For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you   |
| Operational reasons, such as improving efficiency, training and quality control   | For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price  |
| Ensuring the confidentiality of commercially sensitive information  | For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information<br><br>To comply with our legal and regulatory obligations   |
| Statistical analysis to help us manage our business, e.g. in relation to our financial performance, customer base, product range or other efficiency measures | For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service to you at the best price  |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences  | For our legitimate interests i.e. 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<br><br>In certain circumstances where you have given your consent |
| Preventing unauthorised access and modifications to systems   | For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for you and/or us<br><br>To comply with our legal and regulatory obligations   |
| Updating and enhancing customer records and our service provided to you   | To perform our contract with you or to take steps at your request before entering into a contract  |

|  |  |
|--|--|
|  | <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products or services</p>   |
| <p>To enable us to share trip plans with our selected third-party partners (except where your personal data is anonymised) to inform others about recommended trips designed by you.</p> <p>Where your personal data is included, this will be due to the settings of your membership profile and these settings can be amended at any time.</p>               | <p>To effectively perform our contract with you</p> <p>For our legitimate interests or those of a third party, i.e. to share planned trips where our members have chosen to do so</p> <p>In certain circumstances and for certain types of data, where you have given your consent</p> |
| <p>Marketing our services and those of selected third parties to:</p> <ul style="list-style-type: none"> <li>—existing and former customers (both individuals and businesses as applicable);</li> <li>—third parties who have previously expressed an interest in our services;</li> <li>—third parties with whom we have had no previous dealings.</li> </ul> | <p>For our legitimate interests or those of a third party, i.e. to promote our business and services to existing and former customers</p> <p>In certain circumstances where you have given your consent</p>  |

### Special Category Personal Data

Special category person data includes personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership; genetic and biometric data (when processed to uniquely identify an individual); and data concerning health, sex life or sexual orientation.

We do not anticipate that we will collect any such data. However, if we do process special category personal data, we will also ensure we are permitted to do so under data protection laws, for example only where:

- we have your explicit consent;
- the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

### Marketing

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We may use your personal data to send you updates (by email, text message, telephone or post) about our products and services, including exclusive offers, promotions or new products and services.

We have a legitimate interest in using your personal data for marketing purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you marketing information. However, where consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us at [privacy@road.travel](mailto:privacy@road.travel);
- using the 'unsubscribe' link in emails; or
- updating your marketing preferences on our website at <https://road.travel/en/profile/edit>.

We may ask you to confirm or update your marketing preferences if you ask us to provide further products and services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and will obtain your express opt-in consent before we share your personal data with any third party for marketing purposes.

### **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.

### **Who we share your personal data with**

We routinely share personal data with:

- our third-party partners in order to deliver our services to them, with your consent (where necessary);
- our distributors and collaborative partners;
- third parties we use to help deliver our products and services to you, e.g. payment service providers, database/cloud servers;
- other third parties we use to help us run our business, e.g. marketing agencies or website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to;
- our insurers and brokers;
- our bank.

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

We may also need to:

- share personal data with external auditors to ensure compliance with legal and regulatory requirements;
- disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations;
- share some personal data with other parties, such as potential buyers of some or all of our business or during a restructuring—usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

#### **Where your personal data is held and transfers abroad**

Personal data may be held at our offices or by our data server provider located in the Netherlands, third party agencies, service providers, distributors, representatives and agents as described above (see above: '**Who we share your personal data with**').

For our customers based in the UK or European Economic Area (EEA), please be advised that some of that these third parties may be based outside the UK or EEA.

If you are based outside the UK, your personal data may be transferred to the UK as this is where we are based. For our customers based in the UK or European Economic Area (EEA), please be advised that some of that these third parties may be based outside the UK or EEA. Under UK and European data protection laws, we can only transfer your personal data to a country or international organisation abroad in certain circumstances. We will ensure that where your personal data is transferred abroad, it does so in accordance with applicable laws.

This may include an adequacy decision being in place in relation to the country that is in receipt of your personal data or we may make an impact assessment and then have in place appropriate safeguards to protect your personal data, including the use of approved Standard Contractual Clauses, UK addendum and/or International Data Transfer Agreements, where deemed safe. Alternatively, a specified transfer exception may apply.

#### **How long your personal data will be kept**

We will keep your personal data while you have an account with us or we are providing services to you. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;



- to notify you of any health or safety risk in relation to any of the products that have been delivered to you
- to show that we treated you fairly;
- to keep records required by law.

We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data. When it is no longer necessary to keep your personal data, we will delete or anonymise it.

### **Third-party links**

This website may include links to third-party websites, plug-ins, applications, or other technologies. Clicking on those links or enabling those connections via selecting a third-party service may allow third parties to collect or share data about you.

After purchasing our services and products, if you want, you may select to book rental cars and/or accommodation from our third-party supplier partners via our website. In such a case, you will see the name of the supplier who provides the supplemental services to you directly, and their terms and conditions and privacy policies will apply to your interactions with them. We do not control these third-party service providers or their websites, and we are not responsible for their collection and use of your personal data or privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### **Cookies**

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device, store information about your preferences or past actions and improve the content of the website according to your usage.

For example, we may monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of your internet service provider. This information helps us to build a profile of our users and provide all the features of our website. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

We use the following cookies:

- **Strictly necessary/essential cookies.** These are cookies that are required for the operation of our website and without them our website can't operate properly. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. As these cookies are necessary for the correct functioning of our Platform, you are unable to control their use from within the cookies management tool.
- **Analytical and marketing cookies.** These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding

what they are looking for easily and provide you with a more relevant browsing experience or personalise the content on our site.

- **Functional cookies.** These are used to recognise you when you return to our website and monitor the performance of our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting/advertising cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

Some cookies may fulfil more than one of these purposes.

### **Consent to use cookies and changing settings**

Strictly necessary/essential cookies do not require your consent. We will ask for your consent/permission to place other cookies or other similar technologies on your device, except where they are essential for us to provide you with a service that you have requested and/or the functioning of the website. You do not need to allow other than strictly necessary/essential cookies to visit our website. However, enabling them may allow for a more tailored browsing experience.

You can disable the use of cookies via your browser at any time, but please note that our Platform may no longer work properly. You can exercise your cookie preferences when you first arrive at our Website where you will see a notice with a pop-up about our use of cookies by clicking “You can change your preferences at any time” to choose which cookie technologies you wish to allow to access your device before confirming and proceeding. You can also change these settings, customise, manage or withdraw any consent to the use of cookies at any later point by going to “Data Collection Settings” at the bottom of the page.

For instructions on how to block, delete or disable any cookies, please consult your browser’s ‘Help’ or ‘Support’ section. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our website.

Please consult the following links for information on cookie management and blocking according to your browser:

(a) Explorer: <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>.

(b) Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

(c) Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

(d) Safari: [https://support.apple.com/kb/PH19214?locale=en\\_GB](https://support.apple.com/kb/PH19214?locale=en_GB)

You can opt out of third-party tracking networks using the following tools:

- Click [here](#) to opt out of Google Analytics

- Click [here](#) to opt out of Yandex.Metrica

You can find general information and opt-out resources at [youonlinechoices.eu](http://youonlinechoices.eu). For further information on cookies generally, including how to control and manage them, visit the guidance on cookies published by the UK Information Commissioner’s Office, [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Third Party Cookies

As well as our own cookies, we may engage third party providers to act on our behalf to ensure safe browsing, enrich user experience and track and analyse your usage of our website. These third parties collect, and share with us, usage information about visits to our website, measure and research the effectiveness of our advertisements, track page usage, help us target our recommendations and advertising, and track use of our recommendations and advertisements

Throughout our website we may also link to other websites owned and operated by certain trusted third parties to, for example, make additional products and services available to you. These other third-party websites may also use cookies or similar technologies in accordance with their own separate policies. For privacy information relating to these other third-party websites, please consult their policies as appropriate.

### YOUR RIGHTS

You have the following rights in relation to your personal data, which you can exercise at any time:

|   |  |
|---|--|
| Access  | The right to be provided with a copy of your personal data   |
| Rectification                                     | The right to require us to correct any mistakes in your personal data  |
| Erasure (also known as the right to be forgotten) | The right to require us to delete your personal data—in certain situations.  |
| Restriction of processing                         | The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data  |
| Data portability                                  | The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations |
| To object   | The right to object:<br><br>—at any time to your personal data being processed for direct marketing (including profiling);   |

|   |  |
|---|--|
|   | —in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.                               |
| Not to be subject to automated individual decision making | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you |

For further information on each of those rights, including the circumstances in which they apply, please contact us (see ‘**How to contact us**’ below) or see the Guidance from the UK Information Commissioner’s Office (ICO) on individuals’ rights.

If you would like to exercise any of those rights, please:

- contact us—see below: ‘**How to contact us**’;
- provide enough information to identify yourself; and
- let us know what right you want to exercise and the information to which your request relates.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Keeping your personal data secure**

We have appropriate security measures to prevent personal data from being accidentally lost, used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have security procedures in place as well as technical and physical restrictions to access to ensure that your personal data is safeguarded at all times.

We have procedures in place to deal with any data security breach. We will notify you and any applicable regulator of a data security breach where we are legally required to do so.

## How to make a complaint

Please contact us if you have any query or concern about our use of your information (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You also have the right to make a complaint at any time to your local data privacy supervisory authority. Information Commissioner's Office (ICO), is the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns in the first instance.

## Changes to this privacy policy

We may change this privacy notice from time to time. Please ensure that you regularly check this privacy policy for any changes that may affect you. The Last Revised date is written on the top.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## How to contact us

You can contact us and our data protection manager by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

| Our contact details |  |
|---------------------|--|
| Address:            | Timescenery Ltd, C/O Redfern Legal LLP, 7 Henrietta Street, Covent Garden, London, WC2E 8PS, United Kingdom. |
| Email address:      | <a href="mailto:privacy@road.travel">privacy@road.travel</a>   |
| Telephone number:   | +44 (0) 800 041 8483   |