



# PRIVACY POLICY

Hellene School Travel Limited (company number 12741298) respects your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights.

If you have any questions about our use of your personal information, please contact:

Data Compliance Manager  
Hellene School Travel Limited  
16 Courtlands Close,  
South Croydon, CR2 0LR

[info@helleneschooltravel.com](mailto:info@helleneschooltravel.com)

## WHAT DO WE DO?

Hellene School Travel is an independent company offering bespoke Classical Educational Tours and Cultural Holidays. For more information about us, please visit: [www.helleneschooltravel.com](http://www.helleneschooltravel.com)

## NOTICES

On this page you will find privacy notices that show what data we process about you, why we process that data and what the legal bases are for processing that data. Please select the Privacy Notice that applies to you to see more information:

- Privacy Notice for Passengers
- Privacy Notice for Job Applicants
- Privacy Notice for Employees

## PRIVACY NOTICE FOR PASSENGERS

This privacy notice explains how we collect, store and use personal data about passengers. Hellene School Travel is the ‘data controller’ for the purposes of data protection law. The table below shows the data that we process about passengers, the reasons for processing this data and the lawful bases for processing this data. Cells marked with an asterisk (\*) indicate that parent or guardian data may also be processed in the same way, where a passenger requires parental consent.

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Your name, date of birth, gender, addresses, email addresses and phone numbers. Your relationship to the passenger.*	To identify you to communicate with you	Fulfilment of a contract with you Compliance with a legal obligation
Your nationality, ethnic background, any special educational needs, special requirements or disabilities	To provide appropriate information and assistance for you	Fulfilment of a contract with you Compliance with a legal obligation
Next of kin and emergency contact numbers	To contact your family or close friends in the event of an emergency	To protect your vital interests
Your passport, Biometric Residence Permit and visa details	To meet government immigration regulations	Compliance with a legal obligation
Your medical information, including medications you take, allergies and dietary requirements	To help you manage your health while you are with us	Fulfilment of a contract with you Compliance with a legal obligation
Details of your welfare such as how you are getting on our trips or child protection records and any problems or issues you may have had	To look after your wellbeing and meet government safeguarding regulations	Fulfilment of a contract with you Compliance with a legal obligation
Images	For maintaining security	Compliance with a legal obligation

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
	For marketing our services	Where you have given us consent
CCTV footage*	For security management	Compliance with a legal obligation  Necessary for our legitimate interests (to maintain building and personal security)

Where we have obtained consent to use passenger data, this consent may be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

## WHEN DO WE SHARE PASSENGER DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation Name	The Reason for Sharing
Regulatory bodies, such as ABTA, CAA or the British Council	To comply with regulatory inspections
Service providers	For running surveys, providing taxi or excursion services, providing security services
Financial organisations*	For processing payments
Our auditors	For carrying out legal audits of company accounts
Health and social welfare organisations	To manage passenger wellbeing

Organisation Name	The Reason for Sharing
Professional advisers and consultants	To assist us in developing our business
Police forces, courts, tribunals*	For dealing with legal issues
Your family and representatives	To share details of your academic progress or to tell them about attendance or behaviour issues

## TRANSFERRING PASSENGER DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## STORING PASSENGER DATA

We will keep personal information about you while you are an active passenger. We create and maintain records for each individual passenger. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as a passenger/customer of Hellene School Travel. Once your time as a passenger/customer with us has ended, we will retain these records and delete them in accordance with our Data Retention Policy.

## PRIVACY NOTICE FOR JOB APPLICANTS

This privacy notice explains how we collect, store and use personal data about applicants. Hellene School Travel is the ‘data controller’ for the purposes of data protection law. The table below shows the data that we process about applicants, the reasons for processing this data and the lawful bases for processing this data.

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Details that appear on CVs and cover letters such as names, address and date	To assess your suitability for the role you have applied for	To perform an employment contract

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
of birth, education/professional qualifications	and for progressing your application	with you, in the event you are successful
Interview notes/results from assessments	To assess your suitability for the role you have applied for	Necessary for our legitimate interests (to make recruitment decisions)
References from former employers	A pre-employment check to assess your suitability for the role you have applied for	Necessary for our legitimate interests (to make recruitment decisions)
Right to work information	To assess your eligibility for the role you have applied for	Compliance with a legal obligation
Pre-employment checks such as criminal record checks	A pre-employment check to assess your suitability for the role you have applied for	Compliance with a legal obligation; to fulfil regulatory checks
Salary, benefits and bonus information	For the purposes of making an offer of employment	To perform an employment contract with you, in the event you are successful
We may also collect data about ‘special categories’ of sensitive personal information such as your race or ethnicity, religious beliefs, disability, sexual orientation	For equal opportunities monitoring	Compliance with a legal obligation
If we need to make reasonable adjustments as part of the recruitment process	For the purposes of ensuring a fair selection process	Compliance with a legal obligation

Where we have obtained consent to use applicant data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

## WHEN DO WE SHARE JOB APPLICANT DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation Name	The Reason for Sharing
Regulatory bodies, such as Ofsted or the British Council	To comply with regulatory inspections
Service providers	For running surveys
Financial organisations	For processing payments
Our auditors	For carrying out legal audits of company accounts
Professional advisers and consultants	To assist us in developing our business
Police forces, courts, tribunals	For dealing with legal issues

In addition, your personal data may be shared internally with other employees who are involved in the recruitment process, employees in HR who have responsibility for recruitment and onboarding, employees in IT for setting up systems and permissions, and employees in security for access to our premises.

## TRANSFERRING JOB APPLICANT DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## STORING JOB APPLICANT DATA

We will keep personal information about you while you are an active applicant. We create and maintain files for each applicant. The information contained in these files is kept secure and is only used for purposes directly relevant to your position as an applicant. Once the application process is finished, we will retain this file if your application is successful in accordance with our Staff Privacy Notice, or delete it after 12 months, in accordance with our Data Retention Policy.

## PRIVACY NOTICE FOR EMPLOYEES

This privacy notice explains how we collect, store and use personal data about employees. Hellene School Travel is the ‘data controller’ for the purposes of data protection law. The table below shows the data that we process about employee and agencies, the reasons for processing this data and the lawful bases for processing this data.

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Name, date of birth, gender	To administer our relationship with you	Fulfilment of a contract with you
Telephone number, email address, postal address	To administer our relationship with you	Necessary for our legitimate interests (to manage the workforce)
Next of kin and emergency contact numbers	To contact family or close friends in the event of an emergency	To protect your vital interests
Bank account details, payroll records, National Insurance number, tax status information, salary, annual leave, pension & benefits information, marital status	To process salary payments	Fulfilment of a contract with you
	To provide tax and related data to HMRC	Compliance with a legal obligation
Recruitment information, including copies of right to	To administer the business	Compliance with a legal obligation

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
work documentation, references and other information included in a CV or cover letter or as part of the application process	To facilitate safe recruitment, as part of our safeguarding obligations towards pupils	Necessary for our legitimate interests (recruitment)
Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships	To administer our business	Necessary for our legitimate interests (to manage the workforce)
Performance information; outcomes of any disciplinary and/or grievance procedures; absence data	To administer our business	<p>Fulfilment of a contract with you</p> <p>Necessary for our legitimate interests (to support effective performance management)</p>
Copy of driving licence	To ensure legal, insured use of vehicles	Compliance with a legal obligation
Images	For maintaining security	Compliance with a legal obligation
	For marketing our services	Where you have given us consent
CCTV footage	For security management	Compliance with a legal obligation
Data about your use of the organisation's information and	To meet our safeguarding obligations	Compliance with a legal obligation



The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
communications systems, including Internet use	To administer and protect the business	Necessary for our legitimate interests (to secure our buildings)
Criminal record information	To meet our safeguarding obligations	Compliance with a legal obligation
Medical and disability information	To meet the requirements of our accrediting bodies	Necessary for our legitimate interests (to meet the requirements of accrediting bodies)

Where we have obtained consent to use employee data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

## WHEN DO WE SHARE EMPLOYEE DATA?

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation Name	The Reason for Sharing
Government departments	To meet our legal obligations on matters such as tax and social security
Service providers	Such as companies that run surveys for us or provide travel or insurance services or venues that are hosting events for us
Financial organisations	For processing payments, administering pensions
Our auditors	For carrying out legal audits of company accounts
Police forces, courts, tribunals	For dealing with legal issues

Organisation Name	The Reason for Sharing
Security providers	For Disclosure and Barring Service checking services
Other employers	To provide an employment reference on your behalf and where you have given your consent to the prospective employer to contact us

## TRANSFERRING EMPLOYEE DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area. Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## STORING EMPLOYEE DATA

We will keep personal information about you while you are an active employee. We create and maintain records for each member of staff. The information contained in these records is kept secure and is only used for purposes directly relevant to your position as an employee of Hellene School Travel. Once your time as an employee with us has ended, we will retain this file and delete the information in it in accordance with our Data Retention Policy.

## YOUR RIGHTS

Under certain circumstances, you may have certain rights regarding how your personal data is used and kept safe, including the right to:

*Right of Access: You have the right to a copy of the information we hold about you.*

*Right to Object: You may object to the use of personal data if it would cause, or is causing, damage or distress. You have the right to object to any decisions taken using automated processes. You also you have the right to object to certain types of processing such as direct marketing.*

*Right to be Forgotten: Under certain circumstances, you can ask for the data we hold about you to be deleted from our systems.*

*Right to Rectification: If data we hold about you is inaccurate or incomplete, you have the right to correct or complete that data.*

*Right to Restriction of Processing: Where certain conditions apply you have a right to restrict the processing of data.*

*Right of Portability: You have the right to have the data we hold about you transferred to another organisation.*

Some of these rights may not apply where we are legally obliged to keep or share your personal data. If you wish to exercise any of these rights, please contact our Data Compliance Manager (see below).

## COMPLAINTS

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. To make a complaint, please email our Data Compliance Manager [info@helleneschooltravel.com](mailto:info@helleneschooltravel.com)

Alternatively, you can make a complaint to the Information Commissioner's Office in the UK via the options listed below, although we would be grateful for the opportunity to address your concerns before you contact the ICO.

How to contact the ICO:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call +44 303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, UK
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*(Last Updated: 6<sup>th</sup> October 2020)*