



# **Angela Shanley Associates Ltd.**

## **Privacy Policy**

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## Privacy Statement Summary:

Who will use my data?	Angela Shanley Associates Ltd
What for?	<p>We use personal information for purposes of administering and expanding our Leisure, Travel &amp; Tourism business activities, providing customer service and making available other products and services to our customers and prospective customers. Occasionally, we may also use the information we collect to notify you about important changes to this website, new services, and special offers we think you will find valuable. You may notify us of your desire not to receive these offers by clicking the unsubscribe link contained in each such email or by contacting us at any time. We may also use your data to process payments and other financial transactions. We will only process your data in relation to financial transactions with your explicit consent.</p>
What will happen if I contact you?	<p>If you contact us, we will use your information to send you the information you have requested and updates, offers and other information that we think you will be interested in.</p> <p>If you choose to use our services, we may collect more information from you and where necessary share your information with carefully selected third parties required to provide the services you have requested. We might also use your information to send you marketing emails about our services.</p> <p>Where we share your data, this will be as you would reasonably expect and always with your consent.</p>
How we get your personal data	<p>Most of the personal information we process is provided to us directly by you for one of the following reasons:</p> <ul style="list-style-type: none"> <li>● You contact us by email, telephone and through other written and verbal communication</li> <li>● You use the “Agent registration” form on our website</li> <li>● You use the “Email ASA” form on our website for newsletters</li> </ul> <p>We use the information that you have given us in order to provide you with access to all relevant parts of our website and to supply the services you have requested.</p> <p>When you use the “Agent registration form”, we will request certain details as a requirement for an application to open an account with us. That information contains the following:</p> <ul style="list-style-type: none"> <li>● Full Name</li> <li>● Job Title</li> <li>● Company name</li> <li>● Company Address</li> </ul>

	<ul style="list-style-type: none"> <li>● Type of company &amp; any information relevant to your business needs.</li> </ul> <p>When you use the “Email ASA” form we will request certain details as:</p> <ul style="list-style-type: none"> <li>● Full Name</li> <li>● Company Name</li> <li>● Email</li> </ul> <p>We will also collect and store personal information where:</p> <ul style="list-style-type: none"> <li>● You contact us with a general enquiry (website, post, email and telephone)</li> <li>● You request information about our services</li> <li>● You enter into a contract with Angela Shanley Associates Ltd</li> <li>● You complete a customer satisfaction form</li> <li>● You contact us to make a complaint</li> </ul> <p>The data we collect via the methods identified above is used by Angela Shanley Associates Ltd only. Unless required to do so by law or to deliver services to you, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.</p> <p>We collect a limited amount of data, only to provide our services that you’ve requested, and other information that we think you will be interested in.</p>
<p>What data will be stored?</p>	<p>We will store your personal details, such as name, address, email and phone number and other personal details in order to provide our Leisure, Travel &amp; Tourism services to you.</p> <p>We will store details of booking enquiries, purchases, and related financial information as required to run our business but always as you would reasonably expect.</p> <p>We will store your personal details, and financial information in order to provide our services to you and run our company.</p> <p>We will store your details plus relevant information relating to enquiries, contracts and financial, and other information as required. This will include your contact details and company information.</p>
<p>What data will be shared?</p>	<p>We will not share your data with any third parties other than as described here. As our legal obligation, we might share your information with local regulators if they send requests.</p> <p>We ensure access is restricted to only those persons authorised by us to access your data.</p>

	<p>We will never sell your personal data to other companies / third-parties.</p> <p>When necessary to provide our service to you, we will share your data with trusted third-parties. Before we share your data with them, we will ensure that all appropriate safeguards and measures are taken in compliance with the GDPR.</p>
How long?	<p>Your data will be stored only for as long as strictly necessary to provide our services to you and meet our legal obligations after which time your data will be deleted.</p> <p>Your data will be stored only for 7 years or as described in our Data Retention policy after which time your data will be deleted.</p>
Who can access my data?	<p>We will never sell, share, or otherwise distribute your data to any other third party other than as described here.</p> <p>We will share your information with any regulator or legal body that requests it as well as any parties relevant to the application process.</p> <p>We ensure access is restricted to only those persons authorised by us to access your data.</p> <p>When necessary to provide our service to you, we will share your data with trusted companies, such as:</p> <ul style="list-style-type: none"> <li>- Wordplay for payment;</li> <li>- Mailchimp for email marketing;</li> <li>- Tourplan for customer management;</li> </ul> <p>Before we share your data with our partners, we will ensure that all appropriate safeguards and measures are taken in compliance with the GDPR.</p> <p>We will never share your data with our partners, and we will never transfer your data outside the borders without your consent.</p>
How is my data kept secure	<p>We will store your data on secure based servers which will be processed within our borders. We use industry standard security protocols/technology to secure your data.</p> <p>Where we do transfer your data outside of the borders, we will take all appropriate precautions to protect your data including establishing DPA/SCCs with any third party.</p>

We take your privacy seriously and will only use your personal information to provide the products and services you have requested from us and to send you information about products and services you may be interested in. We will never sell, share or use your personal information other than as described here.

## About This Privacy Policy

This policy sets out how we will use and share the information that you give us. This policy describes your relationship with Angela Shanley Associates Ltd. The General Data Protection Regulation (GDPR) describes how organisations like ours must collect, handle, process and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. GDPR is underpinned by eight important principals. These say that personal data must:

- Be processed fairly and lawfully
- Be obtained only for specific, lawful purposes
- Be adequate, relevant and not excessive
- Be accurate and kept up to date
- Not be held for any longer than is necessary
- Processed in accordance with the rights of the data subjects
- Be protected in appropriate ways
- Not be transferred outside the United Kingdom, unless that country or territory also ensures an adequate level of protection

We take these responsibilities seriously; this document describes our approach to data protection. This policy helps to protect us from data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.
- Any other loss or damage caused as a result of data breaches of other data issues.

## Who We Are And How To Contact Us

Angela Shanley Associates Ltd is registered in the United Kingdom and is registered with the Information Commissioner's Office with the registration number ZA289818. The data controller is Michael Gebreslassie. You can contact us in any of the following ways:

Email: [michael@asa-dmc.com](mailto:michael@asa-dmc.com)

Phone: +44 2073878812

Website: <https://www.asa-dmc.com/>

Post: 2nd Floor, 94-102 Euston Street, London NW1 2HA

### **Our EU Representative:**

Under Article 27 of the GDPR, we have appointed an EU Representative to act as our data protection agent. Our nominated EU Representative is:

Instant EU GDPR Representative Ltd.  
Adam Brogden [contact@gdprlocal.com](mailto:contact@gdprlocal.com)  
Tel +35315549700  
INSTANT EU GDPR REPRESENTATIVE LTD  
Office 2,  
12A Lower Main Street, Lucan Co. Dublin K78 X5P8  
Ireland

### **Who this privacy policy applies to**

Angela Shanley Associates Ltd is a Leisure, Travel & Tourism business. This policy relates to users of Angela Shanley Associates Ltd. Processing of your data is required in order to offer you our services and to manage and grow our business. This policy applies to individuals who have shared their data with Angela Shanley Associates Ltd as either a potential customer, customer, guest, visitor, employee, supplier or in any other capacity.

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of Individuals
- Postal addresses
- Email Addresses
- Telephone numbers
- Information as required to provide our products and services to you
- Other information as required to maintain our relationship
- Sensitive personal information [as defined in GDPR]
- Criminal records
- Medical information Employment information
- Information about family members
- Education / training information
- Video / photos / audio files relating to individuals
- Videos, text, images

- Information shared with us during the investigation
- Any other information relating to individuals

## How your information will be used

We will only use your personal data for the purposes for which we collected it and as you would reasonably expect your data to be processed and only where there is a lawful basis for such processing, for example:

Purpose/Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity, (b) Contact, (c) Financial	Performance of a contract with you, to meet our legal obligations, in our legitimate interest to run our business
As an employee, intern, volunteer, contractor, or agency staff etc...	(a) Identity, (b) Contact, (c) Financial information, (d) Personal information, (e) Employment history f) Sick leave details;	Performance of a contract with you, to meet our legal obligations, in our legitimate interest to run our business, and with your consent.
To process and deliver the services you request including managing payments, fees and charges, and to collect and recover money owed to us	(a) Identity, (b) Contact, (c) Financial, (d) Transaction, (e) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary for our legitimate interests to recover debts owed to us
To manage our ongoing relationship with you which will include notifying you about changes to our terms, products and services, or privacy policy, to maintain our records	(a) Identity, (b) Contact, (c) Profile, (d) Marketing and Communications	(a) Performance of a contract with you, (b) Necessary to comply with a legal obligation, (c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services and (d) Consent
To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity, (b) Contact, (c) Technical	(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise, (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and	(a) Identity, (b) Contact, (c) Profile, (d) Usage, (e) Marketing	(a) Necessary for our legitimate interests to study how customers use our products/services, to

understand the effectiveness of our advertising	and Communications, (f) Technical	develop them, to grow our business and to inform our marketing strategy (b) Consent
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical, (b) Usage	(a) Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy (b) Consent.
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity, (b) Contact, (c) Technical, (d) Usage, (e) Profile	(a) Necessary for our legitimate interests to develop our products/services and grow our business (b) Consent

We may collect and process information about you, including your name, date of birth, address, contact details (including email address and mobile phone number), product and service details, purchase history and data collected as part of any finance application or payment (including previous addresses, employment details and bank account details). We may take personal information from:

- Information that you provide to us when visiting our website (including your email address, IP address, and other technical information)
- Information you provide when you book with us
- Information that you provide when completing employment documents (including your name, gender, date of birth and any educational details and employment details you provide)
- Information that you provide to us when signing up to any distribution lists to receive correspondence from us
- Information relating to any bookings, purchases, requests you make of our services, including any other transaction details made via any of our websites (including your address, telephone number and payment details)

Personal data we receive will be used for the purposes it was provided, including:

- To respond to queries from you regarding the possible purchase of goods or services
- To carry out our obligations arising from any contracts entered into between you and us including the provision of services, and to respond to queries from you regarding those contracts
- To manage and administer the relationships between you and us
- To notify you about changes to our services and to otherwise communicate with you; for example, we will use your contact details in order to respond to any queries that



you submit to us

- To obtain feedback from you regarding us

In accordance with your preferences, we may also use your personal information to provide you with information about products, services, promotions and offers that may be of interest to you. We may use your personal information in order to ascertain the services, promotions and offers that are likely to be of particular interest to you. This document explains how you can change whether to receive this information. Please note that, even if you choose not to receive this information, we may still use your personal information to provide you with important services communications, including communications in relation to any purchases you make or services you use.

## **How to change your preferences**

We operate in line with GDPR data protection guidelines. We respect your rights and will respond to any request for access to personal information and requests to delete, rectify, transfer, data and to stop processing. We will also advise you on how to complain to the relevant authorities (such as the Information Commissioner's Office for the United Kingdom). Any requests or objections should be made in writing to the Data Controller, or you can visit our website, call, or email us to contact us to change your preferences at anytime.

## **Scope of Agreement**

By submitting your personal data on this site or as required for us to provide products and services to you, you are affirming your agreement for such information to be used in accordance with this privacy policy. You will be able to change your preferences at any time by the methods described as prescribed in this document.

We may from time to time use your information for marketing, account management or relationship management purposes. The main purpose of this is to provide you with information about goods and services which we think may be of interest to you and/or to maintain any existing relationship we may have with you.

## **Opting out at a later date**

Where you give your consent for us to process your data, for example when you agree to us sending you marketing information or where you agree to us processing financial data, you can contact us to amend or withdraw your consent at anytime. You can also choose to object to processing and request deletion of your data. We respect all user rights as defined in GDPR. If you have any comments or wish to complain please contact us.

## How we store and process your data

Your data will be collected, stored and processed in the UK only, we do not transfer your data outside the borders. Your data will be stored for up to 7 years or as described in our Data Retention document, to ensure we have appropriate records of service, payments, and other interactions we have with you.

In order to provide our services to you, we use recognised third parties to take payment, conduct credit reports and other checks, manage our company accounts and provide banking services. We will store transactions, payment and order data for up to 7 years or for as long as required by UK financial and company regulations. These third parties may operate outside the borders, if this is the case, we will ensure precautions are in place to protect your data.

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 you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us. If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may be legally obliged to disclose your personal information without your knowledge to the extent that we are required to do so by law; in connection with any ongoing or prospective legal proceedings; in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk); to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

You will only receive marketing communications from us if you have:

- Requested information from us or purchased goods or services from us
- If you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications
- You have not opted out of receiving marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

## Our obligations

We are a data controller. In relation to the information that you provide to us, we are legally responsible for how that information is handled. We will comply with the GDPR in the way we

use and share your personal data. Under certain circumstances, you have rights under the data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

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 may 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.

### **Third Parties**

We may have to share your personal data with the parties set out below for the purposes described in this document:

- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, credit scoring, banking, legal, fraud protection, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

Under the GDPR, we are also permitted to share some information with third parties who use such data for non-marketing purposes (including credit and risk assessment and management, identification and fraud prevention, debt collection and returning assets to you).

## **Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will report any breaches or potential breaches to the appropriate authorities within 24 hours and to anyone affected by a breach within 72 hours. If you have any queries or concerns about your data usage, please contact us.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **Cookies**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies,

but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

As well as your ability to accept or reject cookies, we also require your permission to store cookies on your machine, which is why when you visit our site, you are presented with the ability to accept our terms of use, including the storage of cookies on your machine. Should you not accept, then you are free to leave our website, at any time.

### **Contacting us, exercising your information rights and Complaints**

If you have any questions or comments about this Privacy Policy, wish to exercise your information rights in connection with the personal data you have shared with us or wish to complain, please contact: Michael Gebreslassie at Angela Shanley Associates Ltd. We will process SARs within 30 days, SAR responses are usually free, but we reserve the right to charge for excessive or unfounded requests. We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied, then you have the right to apply directly to the competent Supervisory Authority.

End of document.