Risk Management
Advice – Support - Response

Privacy Policy

Each of our websites, www.red24.com, www.red24assist.com, and https://traveltracker.red24.com, (the 'site') is operated by the red24 Group, which includes red24 Limited, red24 Operations Limited, red24 CRM (Pty) Limited, red24 Inc, red24 Sales Limited, and Green 24 Limited(referred to as 'we', 'our' and 'us'). Details of our registered office addresses and VAT numbers are set out below.

We are committed to protecting and respecting your privacy. This policy sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us. Please read the following information carefully in order to understand our views and practices regarding your personal data and how we will treat it. By visiting our site and providing information, you accept and consent to the practices described in this policy.

For the purpose of the Data Protection Act 1998 (the 'Act'), the data controller is red24 Operations Limited, whose registered office address is set out below.

Information requirements – website membership

We may collect, request and process the following data when you apply for membership to the site or to the red24 TravelTracker application:

- Information that you provide on our site. This includes information provided at the time of registering to use our site and/or subscribing to our standard online services, and may include:

  - Name;
  - Organisation;
  - Parent company;
  - Work email address;
  - Telephone number;
  - Mobile number;
  - Country; or
  - Password (where applicable).

Information requirements – electronic service requests

In accessing the Website, you agree to be bound by the Terms of Website Use.

Warranty and Limitation of Liability

We may collect, request and process the following data when you make a specific request to us:

- Information required to identify your request or issue.
- Information required to satisfy your request or issue.

We may also ask you to voluntarily complete a follow-up response, to ensure that:

- Service requests have been fulfilled as per your expectations.

- Our service delivery levels are consistent and acceptable.

This information may include personal data (as defined in the Act) and, in the case of https://traveltracker.red24.com, sensitive personal data (also as defined in the Act).

Please note that if you contact us, we may keep a record of that correspondence for follow-up and archival purposes. Client service information is typically retained for up to 18 months.

Web visitor statistics, IP address and cookies

With regard to each of your visits to our site, we may automatically collect:

- Statistical information, including and without limitation, traffic data; location data; weblogs; URL clickstream to, through and from our site; searches you made; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks and mouse-overs); methods used to browse away from the page; phone numbers used to call our customer service number; and other communication data, whether this is required for our own billing purposes or otherwise.

- Technical information about your computer, including and without limitation, your IP address; login information; operating system and platform; browser type and version; time zone setting; and browser plug-in types and versions, all for system administration and to report aggregate information to our advertisers.

This is statistical and technical data about our users' browsing actions and patterns, and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard-drive of your computer.

For further information about cookies, please see our Cookie Policy.

Information we receive from other sources

We may receive information about you if you use any of the other websites we operate or any of the other services we provide. In this case, we will inform you when we collect this data that it may be shared internally and combined with data collected on this site.

We also work closely with third parties and may receive information about you from them, including and without limitation, business partners; sub-contractors in technical, payment and delivery services; advertising networks; analytics providers; search information providers; and credit reference agencies.

Links to other websites

Our site may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over those websites. We cannot be responsible for the protection and privacy of any information you provide while visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy statement applicable to the website in question.

Personal data storage

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by personnel operating outside the EEA who work for us or for one of our vetted suppliers. Such personnel may be engaged in, among other

things, the fulfilment of your order, the processing of your payment details, and the provision of security and other services. By submitting your personal data, you agree to this transfer, storing and/or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share such a password with anyone.

Unfortunately, the security of information transmitted via the internet cannot be completely guaranteed. Although we will take all reasonable measures available to us to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access to it.

Information usage

We use information held about you in the following ways:

- Internal record keeping.
- To improve our products and services.
- To ensure that content from our site is presented in the most effective manner for you and for your computer, or to customise the site according to your interests.
- To provide you with information and send you emails about products or services that you request from us.
- To provide you with information and send you emails about products or services which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our services, when you choose to do so.
- To notify you about changes to our services.
- To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- As part of our efforts to keep our site safe and secure.

Information we receive from other sources

We may combine this information with information that you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

Disclosure of your information

We do not share, sell, rent or trade your personal data with third parties, other than as disclosed within this privacy policy.

We may disclose your personal information to third parties in the following circumstances:

- We use a third-party email service provider to send out emails on our behalf. This third party is only allowed to use your personal information for the sole purpose of delivering emails on our behalf and not for their own promotional purposes.
- To send to analytics and search engine providers that assist us in the improvement and optimisation of our site.

- To credit reference agencies for the purpose of assessing your credit score, where this is a condition of our entering into a contract with you.
- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we, or a substantial percentage of our assets, are acquired by a third party and the personal data held by us about our customers is one of the transferred assets.
- We reserve the right to share your personal data as required by law and when we believe that disclosure is necessary to protect our rights and/or in order to comply with any legal obligation, judicial proceeding, court order, legal process served on our website; in order to enforce or apply our terms of website use (located at www.red24.com/legal/red24_terms_of_website_use.pdf) or product terms and conditions (located at www.red24.com/legal/red24_terms_and_conditions.pdf) and other agreements; or to protect our rights, property, or safety of our personnel, customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- In compliance with relevant personal data protection and privacy laws, for similar purposes as those outlined above, your personal data may also be transferred to:

    - your employer;
    - your relative's employer;
    - insurance company;
    - private medical insurer;
    - credit card company or other financial institution; or
    - the association or other institution or company which purchased the red24 services or products on your behalf or under which you receive the benefit of such services or products.

Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of GB£10 to meet our costs in providing you with details of the information we hold about you.

If you believe that any information we are holding about you is incorrect or incomplete, please write to or email us as soon as possible, at the address below or on enquiries@red24.com. We will promptly correct any erroneous or incomplete information.

Amendments

If we decide to change our privacy practices, we will post these changes to this privacy policy, the home page and other places we deem appropriate, in order for you to be aware of what information we collect, how we use it and under what circumstances, if any, we disclose it.

We reserve the right to modify this privacy policy at any time, so please review it frequently. If we change how we use your personally identifiable information, we will notify you here, by email, or by means of a notice on our home page.

This policy is effective from January 2014.

Enquiries

If you have any questions regarding these Terms, please contact us at enquiries@red24.com.

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