Elegant Resorts Limited - Privacy Policy

Elegant Resorts Limited, (trading as Elegant Resorts), a company registered in England under company number 02100913 and with a registered office address of Elegant House, Sandpiper Way, Chester Business Park, Chester, CH4 9QE (referred to as "we", "us" or "our" in this Privacy Policy), respects your privacy and is committed to protecting your personal data.

This Privacy Policy is designed to inform you how we look after your personal data when you visit our website (regardless of where you visit it from), or when you otherwise provide personal data to us via other means (such as over the telephone, or via email). It sets out your rights to privacy, and explains how the law protects you.

This Privacy Policy is provided in a layered format so you can easily click through to the specific areas set out below.

If there is any terminology used in this Privacy Policy that you are unfamiliar with or you don't fully understand, please refer to the *Glossary* we have set out at the end.

1. **IMPORTANT INFORMATION AND WHO WE ARE**
2. **THE DATA WE COLLECT ABOUT YOU**
3. **HOW YOUR PERSONAL DATA IS COLLECTED**
4. **HOW WE USE YOUR PERSONAL DATA**
5. **HOW WE DISCLOSE YOUR PERSONAL DATA**
6. **WHEN WE TRANSFER YOUR DATA OVERSEAS**
7. **HOW WE SECURE YOUR DATA**
8. **HOW LONG WE RETAIN YOUR DATA FOR**
9. **YOUR LEGAL RIGHTS**
10. **GLOSSARY**

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how we collect and process your personal data, including any data you may provide through this website or via any other means (such as over the telephone, or via email) when you purchase travel services, sign up to our newsletter, take part in a competition, create a profile via our website, etc.

This website is not intended for children and the only circumstances in which we collect data relating to children is where you make a booking of travel services and have children in your party.

It is important that you read this Privacy Policy together with any other privacy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you, so you are fully aware of how and why we are using your data. This Privacy Policy supplements any other such notices and is not intended to override them.

Who is Responsible for Processing Your Personal Data?

Elegant Resorts Limited is the Data Controller: the legal entity responsible for how your personal data is collected, stored and processed.

We have appointed a DPO who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

Contact details

Our full details are:

Full name of legal entity:	Elegant Resorts Limited
Name or title of DPO	Data Protection Officer
Email address:	dpo@portmantravegroup.com
Postal address:	Elegant Resorts Limited, Elegant House, Sandpiper Way, Chester Business Park, Chester, CH4 9QE
Telephone number:	01244 897000

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please *contact us* in the first instance.

Changes to the Privacy Policy and your duty to inform us of changes

We keep our Privacy Policy under regular review. This version was last updated on 15 October 2025 and historic versions can be obtained by *contacting us*. It is important that the personal data we hold about you is accurate and current. Please keep us informed if any of the details you provide to us should change during the course of your relationship with us.

Third-party links
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 for every other website you visit.

2. THE 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). To ensure a tailored service we may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

(A) Identity Data
This includes data relating specifically to your identity, such as your first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, nationality and gender.

(B) Contact Data
This includes data relating to how you may be contacted, such as your billing address, delivery address, email address and telephone number(s).

(C) Financial Data
This includes data relating to your means and methods of payment, such as your bank account and payment card details.

(D) Transaction Data
This includes new and historic data relating to transactions you carry out with us, and other details of products and services you have purchased from us, which is used to ensure your travel experience is always optimised. Specific categories can include:

- Payments to and from you
- Booking characteristic(s) such as:
    - Group dynamic (e.g. couple, group, family, multi-generational)
    - Favored hotel brand(s) and airline preference(s)
    - Transport hub hospitality and transfer arrangements
    - Resort requirements (e.g. on-site services, room type, in-room preferences)

(E) Technical Data
This includes more technical data that we may obtain when you make use of our website, such as your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

(F) Profile Data
This includes the data that we receive when you create a profile with us and then make use of that profile when transacting. Specific elements include:

- Authentication information (your username and password)
- Holiday style(s) (e.g. ski, cruise, beach), interest(s) (e.g. wildlife, sports, cuisine) and location(s)
- Dietary requirements/preferences
- Assistive needs
- Feedback and survey responses

(G) Usage Data
This includes information about how you use our website, products and services.

(H) Marketing and Communications Data
This includes your preferences in relation to whether or not you want to receive marketing from us and our third parties and also your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for analytical purposes. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data with others' to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will be used solely in accordance with this Privacy Policy.

Special Categories of Personal Data

We may collect and process two particular types of special category personal data if you provide related information to us:

- Certain dietary requirements can disclose religious or philosophical beliefs;
- Both physical assistance needs and dietary requirements can infer an individual's health status.

We collect and process the above data only where it is strictly necessary to do so in order to deliver the travel service that you have

purchased or enquired about. Furthermore, we will only collect and process the above special categories of sensitive personal data where you have provided us with your explicit consent to do so.

You are not under any obligation to consent to us processing your sensitive personal data. However, without your consent, we won't be able to make the necessary arrangements to provide the exact travel services that you have booked, or are attempting to book. As a result, if you do not provide this consent, we may not be able to proceed with your booking.

If you are happy to consent to our use of your sensitive personal data, you will also be able to withdraw your consent at any time. However, as this will often prevent us from providing the travel service you have booked, we will be required to treat any withdrawal of consent as a cancellation of your booking and the cancellation charges referred to in clause 24 of our Booking Terms and Conditions (https://www.elegantresorts.co.uk/information/booking-conditions) will become payable.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested we may not be able to perform the contract we have, or are trying to enter into, with you.

In this case, depending upon when you fail to provide the necessary data, we may either not be able to process your booking or we may have to cancel your booking, which will be treated as a 'cancellation by you' under our Booking Terms and Conditions (https://www.elegantresorts.co.uk/information/booking-conditions). We will notify you if we are unable to process a booking or are required to cancel a booking for this reason.

3. HOW YOUR PERSONAL DATA IS COLLECTED

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

(A) Direct interactions

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Make a booking of travel services;
- Create an account on our website;
- Subscribe to our newsletter or other publications;
- Request marketing to be sent to you;
- Enter a competition, promotion or survey;
- Provide us with feedback.

(B) Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at https://www.elegantresorts.co.uk/information/cookie-policy for further details.

(C) Third parties

We may receive personal data about you from various third parties as set out below:

- Technical Data from the following parties:
  (i) Analytics providers such as Google, based outside of the UK;
  (ii) Advertising networks; and
  (iii) Search information providers.

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the UK.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register, based inside the UK.

Please note that when using our website, you may be able to share information through social networks like Facebook and X (formerly Twitter): for example, when you 'like', 'share' or review our services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts, so you are comfortable with how your information is used and shared on them. This will not be the responsibility of Elegant Resorts Limited.

4. HOW WE USE YOUR PERSONAL DATA

Managing Your Personal Data

When you share your personal information with us, you have a right to expect that information to be treated with total confidentiality. Therefore, it is our responsibility to manage your personal data that you provide to us with care and in accordance with all data protection legislation and industry best practice.
Whether you have supplied your personal details online, by phone, by email or in a letter, we will never use them without a lawful reason to do so. We will use your personal data for the purposes for which they were initially requested and as fully explained in this Privacy Policy.

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into, or have entered into, with you;
- 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;
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process your personal data on more than one lawful basis depending on the specific purpose for which we are using it. Please *contact us* if you need details about the specific legal basis we are relying on to process your personal data, where more than one has been set out in the table below.

Purpose/Activity	**Type of data (per section 2: Data We Collect About You)**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new customer.	(a) Identity; (b) Contact.	Performance of a contract with you.
To process and deliver your booking including: (a) Manage payments, fees and charges; (b) Collect and recover money owed to us.	(a) Identity; (b) Contact; (c) Financial; (d) Transaction; (h) Marketing and Communications.	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (e.g. to recover monies owed to us).
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy; (b) Asking you to leave a review, or take a survey.	(a) Identity; (b) Contact; (f) Profile; (h) 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).
To enable you to partake in a prize draw, competition or complete a survey.	(a) Identity (b) Contact (f) Profile (g) Usage (h) Marketing and Communications	(a) Consent
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	(a) Identity (b) Contact (e) 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 website content and advertisements to you and	(a) Identity (b) Contact	a) Consent

measure or understand the effectiveness of the advertising we serve to you	(e) Technical (f) Profile (g) Usage (h) Marketing and Communications	
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(e) Technical (g) Usage	Necessary for our legitimate interests (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)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (f) Profile (g) Usage (h) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To monitor our communications with you in order to check any instructions given to us, for training purposes, for crime prevention, to improve the quality of our customer service and to defend legal claims.	(a) Identity (b) Contact (e) Technical	(a) Necessary for our legitimate interests (to assist us in training our employees and defend our business in the event of a claim). (b) Necessary to comply with a legal obligation;
To register and maintain your details on our Web Enquiry, Members Area and Loyalty Scheme(s).	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical (f) Profile (h) Marketing and Communications	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to keep our records updated and understand how clients interact with our products/services, to develop them and grow our business). (c) Necessary to comply with a legal obligation.
To register and maintain Travel Agents' details on our Travel Agent Portal and Reward Scheme.	(a) Identity; (b) Contact; (c) Financial; (d) Transaction; (e)Technical Data (f) Profile Data (h) Marketing and Communications	(a) Performance of a contract with you; (b) Necessary for our legitimate interests (to keep our records updated and understand how Travel Agents interact with our products/services, to develop them and grow our business). (c) Necessary to comply with a legal obligation.

Using Your Personal Data for Direct Marketing Purposes
Based on your marketing preferences, we use your email and home address to send you details of our latest products and promotions. For further information on how we use your personal data to keep you informed about our products and how you can change your marketing preferences, please contact us.

Obtaining Your Consent
We will obtain your consent to send you details of our latest products and promotions via email marketing in a number of ways. We will obtain your consent when you register your details with us, make a booking, sign up to our email newsletters, request a brochure from us, or enter a competition prize draw. You can change your email preferences at any time by contacting us.

Email Marketing
We would like to keep you informed about our latest product offers and promotions using the email address you provide to us. We may also use your date of birth to send you specific offers for your birthday. To do this, we will ask you to opt-in to receive marketing emails when you first register an account with us, sign up for our newsletter, enter a competition or prize draw or agree for us to use your email address for marketing purposes.
You can opt out of email marketing at any time by clicking unsubscribe on the email (where available), or by contacting us.
Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a purchase from us.

It is your responsibility to ensure that your personal data provided to us is accurate and up to date. You can update your personal contact details, including email address and phone number, by ringing us on 01244 897000.

Cookies
This site uses cookies to distinguish you from other users. Some of these cookies are essential to make this site work properly. Other types of cookie help us to provide you with a good experience when you browse our site, allow us to improve our site or the way we provide our service to customers, or are used to provide you with information or offers from Elegant Resorts or third parties that may be of interest to you.
You can accept or decline cookies at any time by accessing the preference panels from your browser's main menu (usually found under 'Edit', 'Tools' or 'Options'). However, if you choose to remove cookies parts of the site may not work properly or your use of the site may be impaired. For more information about the cookies we use, please see https://www.elegantresorts.co.uk/information/cookie-policy

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please *contact us*.
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.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

(A) Internal Third Parties as set out in the *Glossary*.
(B) External Third Parties as set out in the *Glossary*.
(C) Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Many of our external third parties are based outside the UK, so their processing of your personal data will involve a transfer of data outside the UK.

Where you have requested a booking for travel arrangements which are located or otherwise due to be fulfilled outside the UK, we will have to transfer your personal data to the suppliers fulfilling or providing those travel arrangements outside the UK in order to make your booking and for those suppliers to provide you with the travel arrangements you have booked. Where we are unable to rely on one of the safeguards outlined below when transferring data to those suppliers outside the UK, we will rely on the derogation under Article 49 of the UK GDPR in order to transfer your personal data to countries outside the UK (as the transfer relates to the performance of a contract for your benefit), and you hereby permit us to do so. You also acknowledge that where your personal data is transferred outside the UK, controls on data protection may not be as wide as the legal requirements within the UK.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please *contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. DATA 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

8. DATA RETENTION

How long will you use my personal data for?
We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. Extended personal data retention periods may also apply to Chairman's Club members. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by *contacting us*.
By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction data) for seven years after they cease being customers for tax purposes.
In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.
In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your Personal Data Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please refer to the Glossary section below to find out more about these rights:

(A) Request access to your personal data.
(B) Request correction of your personal data.
(C) Request erasure of your personal data.
(D) Object to processing of your personal data.
(E) Request restriction of processing your personal data.
(F) Request transfer of your personal data.
(G) Right to withdraw consent.

If you wish to exercise any of the rights set out above, please *contact us*

No fee usually required
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.

What we may need from you
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.

Time limit to respond
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.

10. GLOSSARY

LAWFUL BASIS

- **Legitimate Interest**
  means the interest of our business in conducting and managing our business to enable us to give you the best and most secure service and experience. We make sure we consider, and balance, any potential impact on you (both positive and negative), as well as your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent

or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by *contacting us*.

- **Performance of Contract**
  means processing your data where it is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation**
  means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

- **Internal Third Parties**
  Other companies in the Portman Travel Group acting as joint controllers or processors and who are based EEA, UK, USA, Australia, China, New Zealand and provide IT and system administration services and undertake leadership reporting.

- **External Third Parties**

  i. Suppliers of travel services acting as processors based in UK, EU, North America, South America, Middle East, Asia, Africa, Oceania, who provide the travel services that make up any booking of travel services that you make with us.
  ii. Service providers acting as processors based in UK, EU, and USA who provide IT and system administration services.
  iii. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
  iv. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

YOUR LEGAL RIGHTS

Right of Access
You may wish to access a copy of the personal data we hold about you - known as a Subject Access Request. You can do so by ringing, writing to or emailing us. We will respond to your Subject Access Request as soon as possible and, in any event, within the statutory 30 days. However, in the event that we need more information from you to verify your identity, which we must do to ensure we disclose your personal data to the right person, the 30-day response period will only commence from the time that we have validated your identity.

Right of Rectification
If you come to believe any errors exist within the personal data we hold about you, please speak to us on 01244 897000 or contact us at DPO@Portmantravelgroup.com and we will process the correction for you.

Right of Erasure
You have the right to request your personal data to be permanently deleted from our records and systems to avoid any further communication with you. Your request will always be considered in light of the legal bases under which we hold, store and process your personal data and the purpose for which it was collected. Where the legal bases permit, we will carry out your instruction without undue delay. Please note, however, that where we have a legal or contractual obligation to hold your personal data, we may not be able to carry out your request. Were this situation to arise, we would provide you with a detailed explanation. Please contact us at DPO@Portmantravelgroup.com.

Right to Object to Processing
You have the right to object to certain types of processing of your personal data. We will always make it clear to you at the outset of any new arrangement how we are going to process your personal data. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Right to Portability
Should you wish to move the personal data that we hold about you to another organisation in the form of an excel or csv format, please contact us.

Right to be Informed
You have the right to be informed about the collection and use of your personal data. This is commonly communicated via a 'privacy statement' or 'privacy policy' such as this one. We will provide you with information about how we collect and use your data in various means, such as by 'just in time' notices provided to you at the time of collecting your personal data (e.g. during the booking process) and via this Privacy Policy. Our Privacy Policy is regularly reviewed in line with our business processes.

Right to Request restriction of processing (of your personal data).
This enables you to ask us to suspend the processing of your personal data in the following scenarios:

(a) if you want us to establish the data's accuracy;
(b) where our use of the data is unlawful, but you do not want us to erase it;

(c) where you need us to hold the data, even if we no longer require it, as you need it to establish, exercise or defend legal claims; or

(d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Right to Withdraw consent at any time (where we are relying on consent to process your personal data)
Please note that this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.