

PRIVACY POLICY

Last updated: 12 November 2025

1. Introduction

This Privacy Policy describes how **Prime Horizon Travel Ltd** (“we”, “us”, “our”) collects, uses, and protects personal data in accordance with the **UK General Data Protection Regulation (UK GDPR)**, the **EU GDPR**, and the **Data Protection Act 2018**.

We are committed to safeguarding your privacy and ensuring lawful, fair and transparent processing.

By using our website, contacting us, or booking services, you acknowledge this Privacy and Cookies Notice.

2. Data Controller and Contact

Data Controller: Prime Horizon Travel Ltd

Registered Office: 82A High Street, Sidmouth, Devon EX10 8EG, United Kingdom

Email: info@primehorizontravel.com

Website: www.primhorizontravel.com

Data Protection Lead: info@primehorizontravel.com

You may also contact your national Data Protection Authority if located in the EU.

3. When and How We Collect Personal Data

We collect personal data when you interact with us, including when:

- you make an enquiry, booking or payment via our website, phone, email, WhatsApp, social media, online chat or in person;
- you submit travel details, passport information or special requests;
- you subscribe to marketing communications;
- you complete online forms (including Travefy itinerary views and TravelJoy lead forms);
- you engage with us on social media or visit our website (cookies, analytics, device data).
- you subscribe to our newsletter or marketing communications via Mailchimp signup forms or links

We do **not** record phone calls unless explicit consent is provided for training or quality purposes.

4. What Data We Collect

a. Identification & Contact Information

Name, address, email, phone, nationality, date of birth.

b. Booking & Travel Data

Flight details, accommodation preferences, transfers, itinerary information, emergency contacts.

c. Passport & Official Information

Passport number, expiry date, issuing country (only if required).

d. Financial Data

Payments processed via secure third parties (e.g. Square, Stripe).

We **do not** store card numbers — only date, amount, transaction ID.

e. Health & Special Category Data

Allergies, dietary restrictions, medical needs or mobility assistance — processed **only with explicit consent**.

f. Technical Data

IP address, browser type, operating system, device identifiers, cookies, analytics data.

5. Legal Bases for Processing

- **Contract performance** – to fulfil travel bookings.
 - **Legal obligation** – tax, accounting, safety requirements.
 - **Legitimate interest** – fraud prevention, service improvement, security.
 - **Consent** – marketing and special category data.
 - **Vital interests** – protecting life or health in emergencies.
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6. How We Use Personal Data

We use data to:

- manage and deliver travel services;
- communicate booking confirmations and changes;
- process secure payments;
- provide customer support;
- meet regulatory obligations;
- improve website performance and user experience.

We **never** sell or rent personal data.

7. Marketing Communications

We may send marketing messages (email, SMS, WhatsApp, social media) if you have opted in. Marketing communications are sent **only with your consent**.

Newsletter subscriptions are managed through **Mailchimp**, using **double opt-in**.

You may withdraw consent at any time by:

- emailing info@primehorizontravel.com
- clicking “unsubscribe” in emails
- replying STOP to SMS
- updating preferences online

8. Data Sharing and Disclosure

We share data only with essential, trusted partners:

- airlines, hotels, transfer operators
- travel suppliers and tour partners
- payment processors (Square, Stripe)
- IT hosting and security providers
- immigration/border authorities where required
- regulators or law enforcement if legally necessary

All partners must process data lawfully, securely and confidentially.

9. International Transfers & Third-Party Software

Certain partners operate outside the UK/EEA.

We use:

- **TravelJoy Inc. (USA)**
- **Travefy Inc. (USA)**

Both participate in the **EU–US Data Privacy Framework (DPF)** and **UK Extension to the DPF**, recognised as providing adequate protection.

Additional safeguards may include:

- Standard Contractual Clauses (SCCs)
- encryption and access controls
- contractual data protection commitments

Transfers also occur when booking global travel suppliers.

Learn more: www.dataprivacyframework.gov

10. Data Retention

Category	Retention Period
Booking & payment records	6 years (legal requirement)
Passport & travel documents	Deleted within 60 days after travel
Health & Special Category Data	Retained for up to 6 years post-travel for legal defence and complaints. Travellers must reconfirm all health data for each new booking. Previous data will not be assumed accurate.
Marketing data	Until consent is withdrawn

Data is securely erased or anonymised when no longer necessary.

11. Data Security

We use technical and organisational measures including:

- SSL encryption
- firewalls
- restricted access
- secure password controls
- regular security audits

No system is 100% secure. Data is transmitted at your own risk.

12. Your Rights (UK & EU GDPR)

You may request at any time:

- access
- rectification

- erasure
- restriction
- data portability
- objection to processing
- withdrawal of consent

Contact: info@primehorizontravel.com

Complaints can be made to the **ICO** or your EU Data Protection Authority.
