

DATA PROTECTION POLICY

1. Data protection principles

Theobolds Coaches & Holidays Limited is committed to processing data in accordance with its responsibilities under the Data Protection Act 2018.

It requires that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals.
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be incompatible with the initial purposes.
- c) adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay.
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the DPA in order to safeguard the rights and freedoms of individuals; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

- a) This policy applies to all personal data processed by the Theobolds Coaches & Holidays Limited.
- b) The Responsible Person shall take responsibility for the Company's ongoing compliance with this policy.
- c) This policy shall be reviewed at least annually.

3. Data collection and processing

Lawful processing

Theobolds Coaches & Holidays Limited will only collect and process personal data when it has a lawful basis to do so, including but not limited to:

- a) The consent of the data subject
- b) Contractual necessity
- c) Legal obligation
- d) Legitimate interests
- e) The protection of vital interests

Transparency

Data subjects will be informed of the purposes for which their data is collected and processed, including the lawful basis for processing, at the point of data collection or before, and their rights in relation to their data.

Consent

Where consent is required for processing personal data, Theobolds Coaches & Holidays Limited shall obtain explicit and freely given consent from data subjects. Consent will be obtained through clear and easily accessible means, and records of consent will be maintained.

4. Data minimisation

Theobolds Coaches & Holidays Limited shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

5. Accuracy

- a) Theobolds Coaches & Holidays Limited shall take reasonable steps to ensure personal data is accurate.
- b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

6. Security

- a) Theobolds Coaches & Holidays Limited shall ensure that personal data is stored securely using modern software that is kept-up to date.
- b) Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c) When personal data is deleted, this should be done safely such that the data is irrecoverable.

7. Data subjects rights

Data subjects have the following rights regarding their personal data:

- a) Right to Access: Data subjects can request access to their personal data.
- b) Right to Rectification: Data subjects can request corrections to their personal data.
- c) Right to Erasure: Data subjects can request the deletion of their personal data.
- d) Right to Data Portability: Data subjects can request the transfer of their personal data.
- e) Right to Object: Data subjects can object to the processing of their personal data.
- f) Right to Restriction of Processing: Data subjects can request the restriction of processing under certain circumstances.

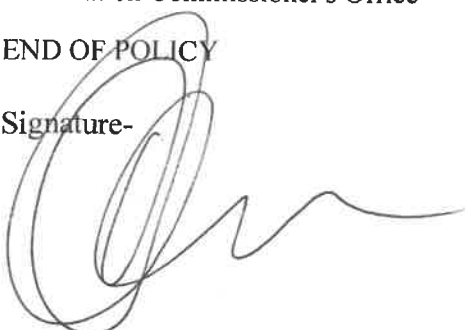
To exercise these rights, data subjects can contact the company at sales@theobolds.com.

8. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Theobolds Coaches & Holidays Limited shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Information Commissioner's Office

END OF POLICY

Signature-

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