



## Sales Privacy Statement

Lemongrass Marketing is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to protecting your privacy. This privacy notice sets out, in line with GDPR, how and why we collect your personal data and how it is used.

### Personal data we collect

Lemongrass Marketing may collect personal data from you in the form of:

- Your name, email address and phone numbers to work with us on client projects. This information will only be added to our internal databases where we have identified a lawful basis to do so and will be deleted wherever the information sits idle for a period exceeding 18 months.
- Your passport details when organising familiarisation trips to our client properties. We will always make you aware in advance when it is necessary for us to process your data in this way and this data will be deleted immediately at the completion of the aforementioned trip.
- Your emergency contacts, next of kin information and if relevant any medical information we need to be aware of when organising familiarisation trips to our client properties. You must have obtained prior express consent from the relevant individuals before sharing this information with us. These details will only be shared in the event of an emergency, or with your explicit consent, and will be stored securely internally for the duration of a trip only and deleted on completion of any trip.
- Photographs may be taken of participants on familiarisation trips to our client properties or during other meetings with our key contacts but we will always make you aware in advance when we seek to process your data in this way. This data would then become the property of Lemongrass Marketing to be used as appropriate.
- Information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address).
- Information that you provide to us when subscribing to our webinars, or that is generated in the course of the use of those services.
- Any other personal information contained in or relating to any communication that you choose to send to us.

### How we collect your data

- Lemongrass Marketing subscribes to databases, Social Media and LinkedIn from which we are able to identify and get in contact with key influencers who have legitimately subscribed to their services, as well as collecting information in person, at trade fairs and from the travel trade press. Where we collect personal data from a third party or public domain source we provide a means to opt-out or unsubscribe on every message we send you.
- Lemongrass Marketing will request further information directly from you when participating on familiarisation trips to our client properties or when commencing work with us on other client projects.
- Lemongrass Marketing may collect your personal data from you, a member of staff, or from a public source where we believe that you will be interested in what we do.

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## How we process your data

Lemongrass Marketing will only process your data as far as is necessary for the relevant purpose, and only when we are satisfied that there is no other reasonable way to achieve that purpose.

In this instance Lemongrass Marketing will process your data for the following purposes:

- It will be necessary for Lemongrass Marketing to share personally-identifying information with our clients in order to build the necessary relationships and partnerships with our clients to progress with projects you or your company is involved in.
- Lemongrass Marketing will process your information in order to internally monitor and report on, internally and to our clients, activities carried out by you for our clients.
- Lemongrass Marketing may send travel trade professionals that we engage with invitations, electronic & paper mailings and other commercial communications in order to communicate and supply key product information to key contacts on its clients (you can inform us at any time if you no longer require the newsletter).
- It may be necessary for Lemongrass Marketing to share your name and postal address with postal services and couriers in order to send relevant information to you via the post.
- To send you marketing communications relating to our business or the businesses of carefully-selected travel trade third parties, including our clients, which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications).
- It will be necessary for Lemongrass Marketing to store personally identifying information on its email marketing platform, and on other IT solution software created and hosted by third parties, who may at times allow access to its sub-processors to perform critical services such as helping to prevent abuse and providing customer support.
- Lemongrass Marketing may make a record of the preferences that you choose to share with us to ensure that we send you the most relevant data/ information when considering you for future projects with our clients.
- It will be necessary for Lemongrass Marketing to share personally-identifying information with our clients in order to arrange familiarisation trips to our client destinations, as well as to secure the safety of participants on the aforementioned trips.
- With your consent Lemongrass Marketing may also share your information with an external Corporate Travel Provider in order to book the necessary transport to enable the trip to take place. If this happens, in certain circumstances your details may be disclosed to overseas recipients such as the overseas travel service provider (e.g. airlines, accommodation or tour providers) with whom they seek to make a booking. Your personal information will only be disclosed to other service providers in connection with facilitation of your travel booking and/ or to enable the performance of administrative and technical services on your behalf.
- Where additional activities are arranged on familiarisation trips Lemongrass Marketing will share personally-identifying data with third parties to the extent required to enable participation on the activities in question.
- Where consent is given Lemongrass Marketing may use photographs it has taken of key contacts on its social media pages, the company website and in company marketing materials.

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- Lemongrass Marketing will send you email notifications containing information that you have specifically requested or to respond to enquiries or requests that you have sent us.
- We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.

### **Children's data**

We do not knowingly process personal data of children under 16, except if you bring your family on an event or trip. In these circumstances we will only retain the data for the duration of the event or trip, at which point the data will then be deleted.

### **Special categories of data**

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already placed the data in the public domain.

### **Who we share personal data with and why**

Lemongrass Marketing will never share your personal data other than in the ways outlined in this Privacy Statement and never without your explicit consent, unless there is a lawful basis on which to do so.

### **International Data Transfers**

Data processed by Lemongrass Marketing is processed in the UK. Where a legal basis has been established to legitimately share your data with our clients they will become the Data Controller and for those located outside of the European Economic Area, local or national rules will apply.

### **Protecting your data**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

Where we share your data with third parties, we provide written instructions to them to ensure that your data is held securely and in line with GDPR requirements. Third parties must also implement appropriate technical and organisational measures to ensure the security of your data.

### **How long we keep your data for**

In line with data protection principles, we will only ever hold your data for as long as we need to for the relevant purpose.

### **Your rights in relation to your data**

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- **the right to be informed** - This means that we must tell you how we use your data, and this is the purpose of this privacy notice

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- **the right of access** - You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available to view [here](#)
- **the right to rectification** - If any data that we hold about you is incomplete or inaccurate, you have the right to ask us to amend it
- **the right to have information deleted** - If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no lawful reason for us to continue to process it
- **the right to restrict the processing of the data** - For example, if you believe the data we hold is incorrect, we can stop processing the data (whilst still holding it) until we have ensured that the data is correct
- **the right to portability** - You may transfer the data that we hold on you for your own purposes
- **the right to object** - You have the right to object to the way we use your data where we are using it for our legitimate interests
- **the right to regulate any automated decision-making and profiling** - You have a right not to be subject to automated decision making in any way that adversely affects your legal rights.

**Please note:** If you would like to exercise any of your rights outlined above please contact us at [privacy@lemongrassmarketing.com](mailto:privacy@lemongrassmarketing.com) outlining your request or concerns.

#### **How to withdraw your consent for us to use your data**

Where you have provided us with consent to use your data, you have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where we are permitted by having a lawful reason to do so.

If you wish to exercise any of the rights explained above, please contact our Office Manager at [privacy@lemongrassmarketing.com](mailto:privacy@lemongrassmarketing.com)

#### **Making a complaint**

If you believe that the organisation has not complied with your data protection rights, you can complain to the Information Commissioner.

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