

GENERAL POLICY ON GDPR COMPLIANCE

This is a summary document on our policy to storing data and some changes we are making following the implementation of GDPR in May 2018

In writing this document we referred to several online documents including the one referenced below and the advice of some of our suppliers particularly those that store some of our data.

<http://www.wired.co.uk/article/what-is-gdpr-uk-eu-legislation-compliance-summary-fines-2018>

We believe the actions we currently take and those we will be implementing are appropriate of our understanding of GDPT taking into account the size and organisation of our operation. Our understanding is that due to the size of our organisation we do not require a dedicated compliance officer but Michael McHugo Discover Ltd managing director will take responsibility for GDPR and will seek support internally or externally on an as needed basis.

Summary of our current operation

- We have never shared client data with unrelated and unnecessary 3rd parties data is only shared with necessary organisations in order to deliver the service and this is stated in our booking conditions privacy policy
- Our newsletter/magazine our only post questionnaire (after delivery of service) contact with client is run by “MailChimp” and is based on a double opt in and “unsubscribe” is always an option
- No credit card data is stored by ourselves and we use major organisation to process any credit cards that are fully compliant and we are PCI compliant and pass checks annually
- We have never and do not intend to mine/harvest data

Changes actions decided upon following the implementation of GDPR and our understanding of it

- In accordance with HMRC rules we will only keep invoice information on our “DIPS” system for the current year and 6 previous years and data older than this will be deleted as soon as is reasonably possible
- All our websites have moved to https
- All our private individuals clients enquiry/contact us to start the relationship.

- All our corporate/agents are ongoing business and we do not typically have individual information of the client other than their name the agent has the personal details
- Any new systems eg tour operator booking/hotel booking systems that we may use in the future will be GDPR compliant
- For any dispute resolution we will keep booking/enquiry correspondence for the current year and proceeding year and then delete it within a reasonable time after this date
- All contact details of non-ongoing relationships not falling within the above time period will be deleted prior to GDPR coming into force.