

PRIVACY (AND COOKIE) POLICY

Saba Park Services UK Limited (“Saba”, “we”, “us” or “our”) is a company incorporated in England and Wales with company number 02362957. Our registered office is Second Floor, Building 4, Croxley Park, Hatters Lane, Watford, Hertfordshire, England, WD18 8YF.

This policy sets out the basis on which any personal data we collect from you, that you provide to us or that we obtain from other sources, will be processed by us when you:

- use our website at www.airport-commuter-shop.co.uk; and
- purchase an Airport Travelcard from us.

For the purpose of data protection laws, the data controller is Saba Park Services UK Limited of Second Floor, Building 4, Croxley Park, Hatters Lane, Watford, Hertfordshire, England, WD18 8YF. We are registered as a data controller with the Information Commissioner's Office under number Z4615901.

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1 BASIS FOR PROCESSING PERSONAL DATA

1.1 Paragraphs 1.2 – 1.6 below explain how and why we process your personal data, as well as the legal basis on which we carry out this processing.

1.2 To provide an Airport Travelcard to you:

1.2.1 Where you register and purchase an Airport Travelcard through our website, either by using our website directly, or through an individual working at the Stansted Airport Commuter Centre completing the registration and purchase process on our website for you, we will process your personal data to provide this product to you and provide you with confirmation of your purchase.

- 1.2.2 We will store your details and the information related to your Airport Travelcard. Our use of your personal data in this way includes your personal data being processed by our employees and other personnel and certain third parties, such as our payment gateway provider, our application developers and our postcode look up service provider. It also involves your personal data being shared with Stansted Airport Limited (the company for whom we provide the Airport Travelcard service).
- 1.2.3 We will also share certain anonymised data with the travel operators relevant to the purchase of your Airport Travelcard. We do not share your personal data with those travel operators.
- 1.2.4 The legal basis for using your personal data in this way is that it is necessary to process it in this way to be able to enter into and fulfil our contract with you for the provision of the Airport Travelcard.

1.3 **To make our website better:**

- 1.3.1 We may also process personal data in order to provide you with a more tailored experience, including using personal data to make sure our website is displayed in the most effective way for the device you are using. This processing means that our services will be more tailored to you.
- 1.3.2 We also use various third-party cookies to help us improve our website (more details are set out in section 3), but we will not share your personal data with the third-party analytics and search engine providers that assist us in the improvement and optimisation of our website.
- 1.3.3 We will also process personal data for the purposes of making our website more secure, and to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- 1.3.4 The legal basis on which we process personal data in these circumstances is our legitimate interest to provide you with a better user experience, and to ensure that our website is kept secure.
- 1.3.5 The use of any non-essential cookies is subject to your consent. You can also prevent us from using your personal data in this way by using the 'do not track' functionality in your internet browser. If you enable such do not track functionality, our website may be less tailored to your needs and preferences.

1.4 **For marketing purposes:** We will **not** process your personal data to provide you with marketing communications.

1.5 **If our business is sold:** We will transfer your personal data to a third party:

- 1.5.1 in the event that we sell or buy any business or assets, in which case we will

disclose your personal data to the prospective seller or buyer of such business or assets (at all times in accordance with all applicable data protection laws); or

- 1.5.2 if Saba or substantially all of its assets are acquired by a third party, in which case personal data held by Saba about its customers will be one of the assets transferred to the purchaser;

in each case, the legal basis on which we process data in these circumstances is our legitimate interest to ensure our business can be continued by a purchaser. If you object to our use of personal data in this way, the relevant seller or buyer of our business may not be able to provide products to you.

- 1.6 **Legal Requirements:** In certain circumstances, we may also need to share your personal data if we are under a duty to disclose or share personal data in order to comply with any legal obligation.

2 CATEGORIES OF INFORMATION WE COLLECT FROM YOU

We will collect and process the following personal data:

- 2.1 **Information you give us:** This is information about you that you give us directly by inputting your details and other information during the online registration process for, and when purchasing, an Airport Travelcard or which we receive indirectly when you provide your information to the Stansted Airport Commuter Centre. The information may include:

- Title and full name
- Name of airport employed at and employer
- Gender
- Date of birth
- Email address
- Home, work and mobile telephone number
- Job title
- Shift type
- Delivery address
- Cardholder address
- Payment card
- Source of where user heard of the scheme
- Airport Travelcard purchase date
- Product purchased
- Start and end dates

- 2.2 **Information we collect:** With regard to visits to our website we will automatically collect the following information:

- 2.2.1 technical information, such as Internet Information Service (IIS) log file formats which include Internet Protocol (IP) addresses used to connect computers to the internet, browser type and version, date, time and site queries. Other information collected includes time zone settings, browser plug-in types and versions, screen resolutions, operating systems, source and destination IPs, packet headers and platforms, protocols and ports; and

- 2.2.2 information about visits, including the full Uniform Resource Locators (URL).
- 2.3 We do **not** process any special categories of personal data, meaning personal data revealing:
 - 2.3.1 racial or ethnic origin;
 - 2.3.2 political opinions; religious or philosophical beliefs;
 - 2.3.3 trade union membership;
 - 2.3.4 genetic or biometric data that uniquely identifies individuals; or
 - 2.3.5 data concerning an individual's health, sex life or sexual orientation.
- 2.4 We do not process data relating to criminal convictions unless legally obliged to do so.

3 COOKIES

- 3.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide users with a good experience when users browse our website and also allows us to improve our website. By continuing to browse the website, you are agreeing to our use of cookies.
- 3.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. We only use (and store) non-essential cookies on your computer's browser or hard drive if you provide your consent.

Cookie	Purpose	Expiration	More information
ASP.NET_SessionID	Manage the user's sessions within the browser.	When the browsing session ends.	
Arepo Session Xfer	Drops any existing sessions and transfers the details to a new session.	When the browsing session ends.	
Airportstravelcard2_username	The user can opt for the website to store their username.	1 month.	User is required to tick 'Allow Cookies' on the login screen (https://www.airport-commuter-shop.co.uk/login.aspx) to ensure their username is recorded

3.3 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

3.4 Except for essential cookies, all cookies will expire as outlined under the expiration column in the table included in paragraph 3.2.

4 USES MADE OF THE INFORMATION

We will combine the information you provide to us with information we collect about you. We will use this information and the combined information for the purposes set out above.

5 WHERE WE STORE PERSONAL DATA

5.1 The data that we collect from you will be stored in (and will not be transferred out of) the European Economic Area.

5.2 All information you provide to us is stored on secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. You must not share your password with anyone.

6 DATA SECURITY

6.1 We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to individuals' personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

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

7 PERIOD OF STORAGE

7.1 Where you purchase a Airport Travelcard from us, we will retain your data for a period of up to seven (7) years after the expiry date of the Airport Travelcard, to ensure that we are able to assist with any questions or feedback in relation to our service or to enforce, or protect, or defend our legal rights.

8 RIGHTS UNDER DATA PROTECTION LAWS

Right to object

8.1 You have the right to object to us processing your personal data where we are processing your personal data:

8.1.1 based on our legitimate interests (as set out at sections 1.3 and 1.5 above). If you ask us to stop processing your personal data on this basis, we will stop processing your personal data unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection laws.

Right of access

8.2 You have the right to receive confirmation as to whether your personal data is being processed by us, as well as various other information relating to our use of your personal data. You also have the right to access your personal data which we are processing.

Right to rectification

8.3 You have the right to require us to rectify any inaccurate personal data we hold about you. You also have the right to have incomplete personal data we hold about you completed, by providing a supplementary statement to us.

Right to restriction

8.4 You have the right to restrict our processing of your personal data where:

8.4.1 the accuracy of the personal data is being contested by you;

8.4.2 the processing by us of your personal data is unlawful, but you do not want the relevant personal data erased;

8.4.3 we no longer need to process your personal data for the agreed purposes, but you want to preserve your personal data for the establishment, exercise or defence of legal claims; or

8.4.4 we are processing your data on the basis of our legitimate interest (as set out at sections 1.3 and 1.5 above) and you:

8.4.4.1 object to our processing on the basis of our legitimate interest under section 8.1.1 above; and

8.4.4.2 want processing of the relevant personal data to be restricted until it can be determined whether our legitimate interest overrides your legitimate interest.

8.5 Where any exercise by you of your right to restriction determines that our processing of particular personal data is to be restricted, we will then only process the relevant personal data in accordance with your consent and, in addition, for storage purposes

and for the purpose of legal claims.

Right to data portability

8.6 You have the right to receive your personal data in structured, standard machine-readable format and the right to transmit such personal data to another controller.

Right to erasure

8.7 You have the right to require we erase your personal data which we are processing where one of the following grounds applies:

8.7.1 the processing is no longer necessary in relation to the purposes for which your personal data was collected or otherwise processed;

8.7.2 our processing of your personal data is based on your consent, you have subsequently withdrawn your consent and there is no other legal ground we can use to process your personal data;

8.7.3 you object to the processing in as set out in section 8.1.1 of this policy and we have no overriding legitimate interest for our processing;

8.7.4 the personal data have been unlawfully processed; and

8.7.5 the erasure is required for compliance with a law to which we are subject.

8.8 You have the right to lodge a complaint with the Information Commissioner's Office, the supervisory authority for data protection issues in England and Wales.

Exercising rights

You can exercise such rights by writing to us at: dpo.uk@sabagroup.com

9 LINKS ON OUR WEBSITE

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that you have left our website and these websites have their own privacy policies. We do not accept any responsibility or liability for these policies or websites. Please check these policies before submitting any personal data to these websites.

10 CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this webpage. Please check back frequently to see any updates or changes to our privacy policy.

11 CONTACT

Questions, comments and requests regarding this privacy policy are welcomed. You can contact us in writing by emailing us at: dpo.uk@sabagroup.com; or you can email the department responsible for managing the Airport Travelcard policy, currently: InfoCommuter@stanstedairport.com.

This privacy policy was last updated on 17 December 2020