



GDPR STATEMENTS & PROCEDURES

1. Travel360° - The activity and communication scope

Travel360° is a B2B content company, that operates in the travel industry. We provide various sorts of content to travel and hospitality industry professionals, students and teachers.

The content includes journalistic content, promotional and marketing content and analytical and insight content. Content is communicated and distributed through website articles, newsletters, events on invitation, e-learnings and training sessions as well as in magazines and other offline communication bearers.

Part of the content is produced by Travel360, part of the content is provided by clients in a client – supplier relationship. This partner content can be articles, various forms of online and offline advertising, and includes sponsorship and sponsored content. The difference between Travel360° produced and client produced or client provided content is made clear, online as well as offline or during events and in other content sources.

Travel360° has various databases with name + e mail address, to be able to send travel industry professionals newsletters and magazines with a blend of professionally relevant and promotional content – always travel and/or hospitality industry related.

All databases are verified by and used through Mailchimp. Mailchimp has been carefully selected as a provider because it's clear, stringent and law-abiding approach for themselves and for their clients. All Travel360° lists in Mailchimp some specific and personal messages or invitations are the result of consent of the list member. This consent is freely given, specifically made clear that it is about travel industry content

exposure, and unambiguous. On all communication through Mailchimp lists – which comprises all general communication initiatives by Travel360° - list members are given a clear option to unsubscribe, should they not longer wish to be part of this list.

The Mailchimp account is managed by the Data Protection Officer, who can delegate access to team members or consultants on a temporary basis, with written specification.

We allow the use of e mail contact details on a reasonable way within the context of an existing or future customer relationship for the offering of specific products or services, without opt-out possibility. Generally, this is the contact for commercial or normal ongoing concern business reasons, through normal e-mail communication channels.

It is in the interest of Travel360° not to send mailings to individual or companies against their wish. Travel360° is a content company – the success of the company is based on travel & hospitality professionals appreciating and wanting the content that Travel360° provides for them.

2. Data collection, record keeping and processing

2.1. Travel360° readers database

The only data that Travel360° collects, are the name and the e mail address. The sole purpose of this data collection, is to be able to send content, related to the person's professional situation. This data is never distributed to other parties, and is never analyzed or enriched. The data is acquired after clear (opt-in) consent from the individual. The database is managed and used through the Travel360° - Mailchimp account.

The Mailchimp account is managed by the Data Protection Officer, who can delegate access to team members or consultants on temporary basis, with written specification.

2.2. Travel360° Event attendees database

Participants to specific events are asked to consent to giving additional information, for the sole purpose of being able to organize the event in an efficient way; this is generally limited to company name, address and invoice details. This information is used per event, and is not added to any general database. Generally, Travel360° uses Fikket.com for this purpose. After the event has taken place, the information is destroyed.

The Fikket account is is managed by the Data Protection Officer, who can delegate access to team members or consultants on temporary basis, with written specification.

2.3 Travel360° Business Development Database

Within the context of an existing or future customer relationship for the offering of specific products or services , Travel360° keeps records of existing and potential business partners. This information is limited to the classic information for commercial ongoing concern purposes: name, company title, phone contact(s), professional e mail address, company address. The information that is stored is concerning the reaction on Travel360° outreach, and is limited to business-related information, making existing or future business transactions possible.

This information is centralized in Highrise.com. The Highrise account is managed by the Data Protection Officer, who can delegate access to team members or consultants on temporary basis, with written specification.

2.4 Travel360° Accounting Database

Within the context of an existing or future customer relationship for the offering of specific products or services, Travel360° keeps specific client information stored in order to allow for the usual business transactions between ongoing concerns – generally this concerns invoices, reminders for invoices and information about contracts between Travel360°'s clients and Travel360°. All relevant information to allow these activities in a normal way for ongoing concerns are kept in Winbooks.

The Winbooks account is managed by the Data Protection Officer, who can delegate access to team members or consultants on temporary basis, with written specification.

2.5. Travel360° data, proceeded by Qite

A part of Travel360° data are proceeded by Qite, the IT partner of Travel360°. Travel360° and Qite have an agreement for the processment of personal data, that has been signed by the responsible persons of both companies.

3. Data Processing by Travel360°

3.3. Data Processing

Travel360° adheres to the law and processes the data in a proper, careful and transparent manner. Travel360° is committed to all current and future on the processing of personal data applicable laws and regulations such as the AVG and the Privacy Act2.

Travel360° has its own information security policy ready and fits enough appropriate technical and organizational measures so that the processing meets the requirements of the AVG and the protection of the rights of data subjects. Travel360° ensures the security and proper use of the access codes, user names and passwords, as well as for regularly changing these codes and passwords, to access to the Data and to process them.

Travel360° undertakes to do everything possible to ensure that everyone who has access to the Data deals with codes and passwords in a confidential manner.

3.2. Confidentiality

Travel360° will keep the Personal Data provided to itself confidential, unless this should not be possible, based on a legal requirement obligation. Travel360° also takes care that its staff and consultants comply with this duty of confidentiality by including a clause concerning this matter in the contract.

In the Data register, Travel360° identifies the individuals who can process the Personal Data, Travel360° guarantees that these persons only have access to the Data they need to to perform their duties or duties under the Agreement. All persons with data access need to have written and clear permission from the Data Protection Officer.

Travel360° has been informed of the provisions in the legislation and standards and of each other applicable regulations concerning the protection of personal data.

Travel360° keeps the Data register at the disposal of the Commission for the Protection of the Personal Privacy (CBPL) or when this applies the Data Protection Authority (GBA).

3.3. Data leaks or Breaches

Travel360° informs the persons and/or companies that are in the above mentioned lists and data bases without unreasonable delay as soon as he becomes aware of a possible personal data breach. Travel360° provides these persons or companies his request for all information concerning the infringement. Travel360° must inform the GBA within 72 hours after being informed. After reporting a Datalek, Travel360 will keep all parties involved informed of new developments surrounding the Datalek and the measures taken to reduce the size of the Datalek limit and prevent a similar incident in the future.

3.4. Software and intellectual property rights

Travel360° undertakes to acquire, maintain and maintain the necessary software and equipment update regularly - as well as the licenses required for their legal use - so that they can have a system in place to fulfill its commitments under GDPR rules. Travel360° assures that no equipment or software that it uses in the context of this contract will infringe the intellectual property rights of a third party (such as copyright, patent, Brand, ...)

4. Data Protection Officer

Within Travel360°, owner Jan Peeters is Data Protection Officer, responsible of overseeing data protection strategy and implementation to ensure compliance with GDPR requirements.

Document created on 18 May 2018

Jan Peeters
Travel360° BVBA
Owner