

## **Privacy Policy – Atlas Reserve**

**Effective Date:** 02 April 2026

**Last Updated:** 02 April 2026

Atlas Reserve (“we”, “us”, “our”) is committed to protecting and respecting your privacy. This policy explains how we collect, use, and safeguard your personal data when you interact with us, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

### **1. Who We Are**

Atlas Reserve is a luxury travel company providing bespoke travel services worldwide.

**Data Controller:** Atlas Reserve

**Contact Email:** [jeremy@atlasreserve.co.uk](mailto:jeremy@atlasreserve.co.uk)

### **2. Information We Collect**

We may collect and process the following types of personal data:

#### **a. Information you provide to us**

- Full name, date of birth, nationality
- Contact details (email, phone number, address)
- Passport details (where required for travel bookings)
- Travel preferences and special requests
- Payment details (processed securely via third-party providers)
- Communication records (emails, calls, messages)

#### **b. Sensitive data (special category data)**

Where necessary for your travel arrangements, we may collect:

- Health or medical information (e.g. dietary needs, mobility requirements)
- Accessibility requirements

We only collect this with your explicit consent.

#### **c. Automatically collected data**

- IP address
- Browser type and device information
- Website usage data (via cookies)

### 3. How We Use Your Data

We use your data to:

- Arrange and manage your travel bookings
- Communicate with you regarding your enquiries or itineraries
- Provide personalised travel recommendations
- Process payments and issue documentation
- Comply with legal and regulatory obligations
- Improve our services and website experience
- Send marketing communications (only where you have opted in)

### 4. Legal Basis for Processing

We process your personal data under the following lawful bases:

- **Contractual necessity** – to fulfil your travel bookings
- **Legal obligation** – to comply with applicable laws (e.g. travel regulations)
- **Legitimate interests** – to operate and improve our business
- **Consent** – for marketing communications and sensitive data

### 5. Sharing Your Information

To deliver your travel services, we may share your data with:

- Airlines, hotels, and tour operators
- Travel service providers (e.g. transfers, guides, concierge services)
- Payment processors
- IT and CRM providers
- Legal or regulatory authorities where required

All third parties are required to respect the security of your data and process it lawfully.

### 6. International Transfers

As a global travel provider, your data may be transferred outside the UK. Where this occurs, we ensure appropriate safeguards are in place, such as:

- UK International Data Transfer Agreement (IDTA)
- Standard Contractual Clauses (SCCs)

### 7. Data Security

We implement appropriate technical and organisational measures to protect your data, including:

- Secure systems and encryption

- Restricted access controls
- Trusted third-party platforms

## **8. Data Retention**

We retain your personal data only as long as necessary to:

- Fulfil the purposes we collected it for
- Satisfy legal, accounting, or reporting requirements

Typically, client data is retained for up to **6 years** after your last interaction, unless a longer period is required.

## **9. Your Rights**

Under UK GDPR, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request deletion of your data
- Object to or restrict processing
- Request data transfer (data portability)
- Withdraw consent at any time

To exercise your rights, contact us at: [jeremy@atlasreserve.co.uk](mailto:jeremy@atlasreserve.co.uk)

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO): <https://www.ico.org.uk>

## **10. Cookies**

Our website uses cookies to enhance your experience and analyse site traffic.

You can control or disable cookies through your browser settings.

## **11. Marketing Communications**

We may send you carefully curated travel inspiration, offers, and updates if you have opted in. You can unsubscribe at any time via the link in our emails or by contacting us directly.

## **12. Third-Party Links**

Our website may contain links to third-party websites. We are not responsible for their privacy practices, and we encourage you to review their policies.

## **13. Updates to This Policy**

We may update this Privacy Policy from time to time. The latest version will always be available on our website.

#### **14. Contact Us**

If you have any questions about this policy or how your data is handled, please contact:

**Atlas Reserve**

Email: [jeremy@atlasreserve.co.uk](mailto:jeremy@atlasreserve.co.uk)