

GBT'S GDPR COMPLIANCE

Data Controller

GBT's services are centrally managed from our global headquarters, GBT Travel Services UK Ltd, 5 Churchill Place, London, UK.

Data Protection Officer

GBT's privacy operations are managed by a Data Protection Officer based in the London headquarters.

Supervisory Authority

GBT's primary data protection regulator is the UK Information Commissioner.

International Transfers

We are the only travel management company to operate under Binding Corporate Rules. Processor assessments identify and impose transfer controls where needed, including EU Standard Contractual Clauses.

Notice & Transparency

Legally compliant notice is provided at privacy.amexgbt.com, the GBT Global Privacy Statement, shared by link from every GBT application and communication. Transparent notices are shared in context in our products to ensure privacy by design.

Accountability

Three interlocking programs, privacy, security and data governance, are tested, documented and audited so that we can demonstrate GDPR compliance.

Data Subject's Rights

Formal data subject request handling procedures and data governance protocols ensure GDPR-compliant responses.

Processing Register

A GDPR-compliant data inventory is part of GBT's data governance programme.

Processor Oversight

We carefully oversee our joint ventures and travel agency partners and thoroughly vet our data processing vendors in an industry-leading third-party risk management programme that includes privacy assessments and contractual controls.

Consent

The limitations of consent as a valid justification for employee travel have led us to build a privacy programme that minimises its use and meets other lawful justifications.

Impact Assessments

Data protection impact assessments are a key element of our product development lifecycle and embedded into other business processes.

Data Protection by Design

Privacy design protocols built into business initiatives, product development and data governance ensure data protection principles, including minimisation, are met.

Data Deletion

GBT's formal record retention program ensures data is kept no longer than necessary. Retention periods are documented and tested through our compliance framework.

Data Security

Our bank holding company roots require industry-leading organisational and technical security controls.

Breach Response

Comprehensive complaint handling and issue management procedures apply across the business to enable identification, escalation and remediation of data issues. A formal crisis and incident response manual includes legally compliant breach notice protocols.