

# PRIVACY POLICY

Effective Date: 1st day of January 2023

## PLEASE READ THE FOLLOWING CAREFULLY

THIS STATEMENT PROVIDES GENERAL INFORMATION ABOUT THE PRIVACY STATEMENT OF THIS WEBSITE. IF YOU ARE UNDER 16 YEARS OF AGE, PLEASE BE SURE TO READ THIS PRIVACY STATEMENT WITH YOUR PARENTS OR GUARDIAN AND ASK THEM QUESTIONS ABOUT WHAT YOU DO NOT UNDERSTAND YOUR USE OF THIS SERVICE CONSTITUTES ACCEPTANCE BY YOU OF THIS PRIVACY STATEMENT.

GLOBAL TRAVELERS LLC ET AL DBA GLOBAL TRAVELERS AND COMPANY (collectively, "GLOBAL TRAVELERS LLC ET AL DBA GLOBAL TRAVELERS AND COMPANY et al", "we", "our" and "us".) has created this privacy statement ("Statement") in order to demonstrate its firm commitment to the privacy of the details that you provide to us when using [Global Travelers and Company](#) ("collectively "the website"), as the data controller for the purposes of the United States relevant Data Legislation (CALOPPA).

At GLOBAL TRAVELERS LLC ET AL DBA GLOBAL TRAVELERS AND COMPANY, we are committed to maintaining the trust and confidence of all visitors to our website. In particular, we want you to know that the website is not in the business of selling, renting, or trading email lists with other companies and businesses for marketing purposes. We believe your business is no one else's. Your Privacy is important to you and to us. So, we'll protect the information you share with us. To protect your privacy, GLOBAL TRAVELERS LLC ET AL DBA GLOBAL TRAVELERS AND COMPANY follows different principles in accordance with worldwide practices for customer privacy and data protection.

- We won't sell or give away your name, mail address, phone number, email address or any other information to anyone.

- We will use state – of – the – art security measures to protect your information from unauthorized users.

Therefore, to provide you with our services we need (and sometimes are obliged by the law) to collect your personal data. This Privacy Policy (the “Policy”) informs Users (a “User”, or “You”) of our policies regarding the processing of Personal Information we receive from users of [Global Travelers and Company](#). In this Privacy Policy, we’ve provided detailed information on when and why we collect personal information, how we use it, the limited conditions under which we may disclose it to others, and how we keep it secure.

We take your privacy seriously and take measures to provide all visitors and users of the website with a safe and secure environment. The Personal Information on [Global Travelers and Company](#), is collected, controlled and processed by the data controller; collected on behalf of GLOBAL TRAVELERS LLC et al dba GLOBAL TRAVELERS AND COMPANY.

## 1. INFORMATION WE COLLECT AND OBTAIN

We obtain personal information about you from a variety of sources. This includes personal information you provide to us directly, information we obtain from other sources, and information we gather through automated means.

### Account Information

If you contact us, register with us, or receive services from us, we collect information about you. You may give us the information, or your employer or travel sponsor may send it to us. This may include your name, email address, phone numbers, employer, and physical addresses. We may also require passport number, gender, and date of birth for travelers. If we book travel for your travel companions, we may collect similar information about them. Account information goes into your traveler profile, which is where we store the information necessary to book your travel and provide you with our services. You

may choose to provide more information in your traveler profile, including frequent traveler credentials, government identifiers and emergency contact information

## Travel Information

If you book travel with us, we collect the details of your travel (such as arrival and departure location, airline, hotel, and car rental) and any other information needed to complete your bookings. We may also collect special categories of information to provide accessibility, meal preferences or other requested services.

## Payment Information

To pay for bookings and other transactions through our services, we collect payment card information and other details necessary to process payments.

## Precise Location

In addition to the broad location information, we receive through travel itineraries or IP address, we may collect your precise location under some circumstances. We may receive it through our mobile applications, with your consent. In addition.

## 2. HOW WE USE THE INFORMATION WE OBTAIN

We, or service providers acting on our behalf, may use the information collected from and about you to:

- We, or service providers acting on our behalf, may use the information collected from and about you to: Provide our services, including authorizing a purchase, or completing a transaction that you requested;
- Send promotional materials as well as running Facebook Ads, alerts regarding available offers and other communications, including text/SMS messages if you provided your mobile number and opted in to receive such messages (for information on our text messaging program, please see our Text/SMS Messaging Program Terms);

- Communicate about, and administer participation in, special events, promotions, programs, offers, surveys, contests, and market research;
- Respond to inquiries from you and other third parties, including inquiries from law enforcement agencies;
- Anonymize or de-identify personal information to provide third parties with aggregated data reports showing anonymized information and other non-personal information;
- Provide technical support;
- Generate suggestions about the type of content you may enjoy;
- Supplement your personal information collected directly from you and/or from automated means with additional information from publicly and commercially available sources, and/or information from our affiliates and our business partners;
- Associate your browser and/or device with other browsers or devices you use for the purpose of providing relevant and easier access to content, advertising across browsers and devices, and other operational/business purposes;
- Operate, evaluate, and improve our business (including developing, enhancing, analyzing and improving our Services; managing our communications; reviewing and processing employment applications, performing data and statistical analytics; and performing accounting, auditing and other internal functions);
- Protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities;
- Comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations, and our terms of service and other policies; and
- In other ways for which we provide specific notice at the time of collection.

### 3. DISCLOSURE OF YOUR PERSONAL INFORMATION

- Third party service providers who perform services on our behalf, such as providers of IT and email distribution services, who may use your personal information for the purposes mentioned above;

- Advisors such as accountants, lawyers, and consultants;
- In the event that we sell or buy any business or assets, the prospective seller or buyer of such business or assets (and their respective advisers), who may use the personal information in connection with the sale or purchase;
- If GLOBAL TRAVELERS LLC ET AL DBA GLOBAL TRAVELERS AND COMPANY or substantially all of its assets are acquired by a third party, to the relevant third party (and its advisers) who may use the data in connection with the acquisition;
- Analytics providers that assist us in the improvement and optimization of our Websites;
- Law enforcement agencies or other third parties for the purposes described below.

We may also disclose your personal information to third parties if we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our Website Terms of Use, our Terms and Conditions and other agreements, or to protect the rights, property, or safety of GLOBAL TRAVELERS LLC ET AL DBA GLOBAL TRAVELERS AND COMPANY, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud detection and protection and credit risk reduction.

#### 4. HOW WE HOLD AND PROTECT YOUR PERSONAL INFORMATION

How we keep your personal information secure. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this privacy policy. All information you provide to us is stored on our secure servers. Any payment transactions will be carried out by third parties over encrypted connections using SSL technology. Where we have given you (or where you have chosen) a password or API key which enables you to access certain parts of our site, or you have invited team members to access parts of our site or apps, you are responsible for keeping this password or API key confidential. We ask you not to share a password or API key with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## 5. OUR RETENTION OF YOUR PERSONAL INFORMATION

The periods for which we keep your information depend on why your information was collected and what we use it for. We will not keep your personal information for longer than necessary other than for our business purposes or for legal requirements

## 6. WHAT ARE YOUR RIGHTS TO YOUR DATA?

All Your Personal Information we collect will always belong to you. However, we are a collector and a processor of Your Personal Information. That implies on us obligations to respect your rights to Personal Information and facilitate the exercise of your rights thereto. In order to use any of your rights at any time please contact us and we will facilitate the exercise of your rights free of charge. We will inform you on the actions taken by us under your request as soon as practically possible, but in any case, not later than 30 (thirty) calendar days.

In accordance with effective regulations, you have a significant number of rights related to your Personal Information, such as e.g.:

Right to access. You may obtain from us the confirmation as to whether or not personal data concerning you is being processed and get an access to such personal data. You are entitled to view, amend, or delete the personal information that we hold. Email your request to our data protection office at

[info@globaltravelersandcompany.com](mailto:info@globaltravelersandcompany.com) and we will work with you to remove any of your personal data we may have.

Right to rectify your inaccurate Personal Information and to have incomplete personal data completed, including by means of providing a supplementary statement right to erase your Personal

Information. Please note that a request to erase your Personal Information will also terminate your account on the Site. We will automatically and without undue delay erase your Personal Information when it is no longer necessary in relation to the purposes for which it was collected or otherwise processed;

Right to restrict processing of your Personal Information;

Right to data portability. You may obtain from us the personal data concerning you and which you have provided to us and transmit it to another Personal Information Controller;

Right to object to processing of Your Personal Information,

Right to withdraw your consent to the usage of your Personal Information at any time

Right to lodge a complaint. We take privacy concerns seriously. If you believe that we have not complied with this Privacy Policy with respect to your Personal Information, you may contact our respective Data Protection Office. We will investigate your complaint promptly and will reply to you within 30 (thirty) calendar days.

## 7. GOOGLE ANALYTICS

When someone visits the website, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to track things such as the number of visitors to the various parts of the site and interactions with the site. This information is processed in a way which does not identify anyone. We do not make and do not allow Google to make, any attempt to find out the identities of visitors to our website.

## 8. SECURING PRIVACY

To transfer data between our websites, our applications and backends, communication is encrypted using the SSL (Secure Socket Layer) encryption. We protect the systems and processing by a series of technical and organizational measures. These include data encryption, pseudonymization and anonymization, logical and physical access restriction and control, firewalls and recovery systems, and integrity testing. Our employees are regularly trained in the sensitive handling of personal data and are obliged to observe data secrecy in accordance with legal requirements.

## 9. MINORS

We do not knowingly gather or otherwise process personal data of minors under the age of 16. If we notice that one of our users/visitors is a minor, we'll immediately take steps to remove their information. If you believe we have processed or still hold information on minors, please send us an email at [INSERT EMAIL ADDRESS] and we'll remove it A.S.A.P.

## 10. CHANGES IN THE PRIVACY STATEMENT

The effective date at the bottom of this page indicates when this Privacy Statement was last revised. We will notify you before any material change takes effect so that you have time to review the changes. Any change is effective when we post the revised Privacy Statement. Your use of the Services following these changes means that you accept the revised Privacy Statement.