

LEEWAY TRAVEL AGENCY

DATA PRIVACY POLICY AND NOTICE

Effective Date: October 14, 2026

Leeway Travel Agency respects your privacy. This notice explains how we collect, use, store, share and protect personal information when you use our website, contact us, request travel services or register for Leeway Travel Club.

We process personal information in accordance with Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012, its Implementing Rules and Regulations, and applicable National Privacy Commission issuances.

1. Information We Collect

We collect information relevant to your inquiry, requested service or membership.

For inquiries and travel services, this may include:

- Name, date of birth, nationality and contact details;
- Passport, visa, identification and other travel-document information;
- Travel preferences, destinations, itineraries and booking details;
- Details of traveling companions, emergency contacts or beneficiaries;
- Billing, payment and transaction information;
- Supporting information required for visa assistance, travel insurance, accessibility arrangements or special travel requests; and
- Correspondence, feedback and records of transactions.

For Leeway Travel Club, this may include:

- First, middle and last name, date of birth, email address, mobile number, country of residence and optional address;
- Registration date, membership ID, tier, status and enrollment details;
- Membership fee and payment-verification records;
- Points, rewards, benefits and relevant membership transactions;
- Your privacy-consent and marketing preferences, including when consent was recorded; and
- Information needed to match your registration with an existing customer record and prevent duplicate memberships.

Our website and online platforms may also collect technical information, such as cookie and website-usage data.

Please provide only information relevant to the requested service. If you provide another person's information, ensure that you are authorized to do so and that they have been informed of this notice.

2. How We Use Your Information

We use personal information to:

- Respond to inquiries and prepare quotations;
- Arrange and manage tickets, accommodation, tours, transfers, insurance, visa assistance and other requested services;

- Communicate booking updates, travel requirements and service-related notices;
- Verify identity and prevent fraud or duplicate records;
- Process payments, invoices, refunds and accounting records;
- Provide customer support and address complaints;
- Register and administer Leeway Travel Club memberships;
- Assign or retain membership IDs and manage membership status, tiers, points and benefits;
- Verify eligibility for membership promotions and rewards;
- Maintain accurate customer and membership records;
- Meet applicable legal, regulatory, tax, audit and recordkeeping obligations; and
- Send promotional communications where you have separately opted in.

We process information on the applicable lawful basis, such as providing your requested services, meeting legal obligations or obtaining your consent for a specific purpose.

Sensitive personal information, including date of birth and relevant health or identification information, is processed only with your consent or another lawful basis permitted by applicable law.

3. Membership Registration and Automated Processing

Leeway Travel Club registration may use Google Forms, Google Sheets and Zoho CRM to record applications and maintain customer and membership information.

When you register, the system may:

- Search for an existing customer record using your email address and mobile number;
- Link your application to an existing Contact or create a new Contact where no match is found;
- Assign a unique membership ID or retain an existing membership ID;
- Apply membership rules based on your registration date, existing membership and verified payment status; and
- Record processing results, including items requiring staff review.

Multiple or conflicting matches and other exceptions are referred for staff review. Registration does not itself guarantee membership activation, payment confirmation or eligibility for every benefit.

If you believe an automated match, membership status or points result is incorrect, contact us to request review and correction.

4. Privacy Consent and Marketing Preferences

Where consent is required, we request it through a clear statement relevant to the information and purpose involved. Merely visiting our website does not constitute consent to every use of your information.

Marketing consent is separate from membership registration and travel-service processing. You may decline promotional communications without losing your membership or affecting your requested travel services.

You may withdraw marketing consent through an available unsubscribe option or by contacting us. Essential booking, payment and membership-administration messages are separate from promotional messages.

If you withdraw consent needed for a particular service or membership activity, we will explain how this affects our ability to continue that activity. Withdrawal does not automatically require deletion of records that must be retained under applicable law.

5. Sharing of Personal Information

We share relevant information only where necessary for the stated purpose, with appropriate recipients such as:

- Airlines, hotels, tour operators and transportation providers;
- Insurance providers, visa-processing centers, embassies and consulates;
- Payment providers and professional advisers;
- Government agencies where disclosure is required or authorized by law;
- Technology and service providers supporting our website, communications, registration and customer-management systems, including Google and Zoho; and
- Participating membership partners where information is necessary to provide or verify a benefit you request.

Club membership does not automatically authorize partners to send you their own marketing communications. Any separate consent required for that purpose will be requested.

We do not sell or rent your personal information.

6. Processing Outside the Philippines

Some travel suppliers and technology providers may process or store information outside the Philippines.

Where international processing or transfer is necessary, we take reasonable steps to ensure that the information is handled securely and for the purposes described in this notice, consistent with applicable Philippine privacy requirements.

7. Cookies and Website Use

Our website uses cookies to analyze website traffic and improve the website experience.

You may use the available website cookie controls or your browser settings to manage cookies. Restricting cookies may affect certain website functions.

Links to external websites may take you to services governed by their own privacy notices.

8. Data Security

We apply reasonable organizational, physical and technical safeguards to protect personal information against unauthorized access, disclosure, alteration, loss or misuse.

Access is limited to authorized personnel and service providers who need the information to perform their duties. No method of electronic transmission or storage can be guaranteed to be completely secure.

9. Data Retention

We retain personal information for as long as necessary for its stated purpose and applicable legal requirements.

- Inquiry and travel records are retained as needed to address inquiries, provide services, resolve disputes and meet recordkeeping obligations.
- Membership records are retained as needed to administer membership, points and benefits, address account issues and meet applicable obligations.
- Payment and accounting records are retained for applicable legal, tax and audit requirements.
- Consent and withdrawal records are retained as needed to demonstrate and honor your preferences.

After membership closure or consent withdrawal, some information may still need to be retained for legal obligations or unresolved transactions.

When information is no longer needed, it is securely deleted, destroyed or anonymized, as appropriate. You may contact us for information about the retention period applicable to your records.

10. Your Data-Privacy Rights

Subject to applicable law, you may request to:

- Be informed about how your personal information is processed;
- Access your personal information;
- Correct inaccurate or incomplete information;
- Object to processing where applicable;
- Request erasure or blocking where legally allowed;
- Withdraw consent where processing relies on consent;
- Exercise applicable data-portability rights;
- Request review of an incorrect automated membership result;
- File a complaint with the National Privacy Commission; and
- Seek available remedies under applicable law.

We may request reasonable information to verify your identity before acting on a request. Where a request cannot be fully granted because of an applicable legal requirement, we will explain the reason.

11. Contact Us

For privacy questions, consent withdrawal or requests concerning your information, contact:

Data Protection Officer

Leeway Travel Agency

Email: inquiries@leewaytravelagency.com

Telephone: +63 962 582 1316

Address: 3rd Flr. Robertson Plaza, Centennial Rd., Kawit, Cavite 4104, Philippines

12. Changes to This Notice

We may update this notice when our services, systems or privacy practices change. The current version will be available on our website and will indicate its effective date.

Where a change introduces processing that requires new consent, we will request that consent before carrying out the new processing.