Travel Advantage – Privacy Policy

This Privacy Policy provides an overview of all information regarding the processing of personal information by Travel Advantage, hereafter referred to as **Travel Advantage**, **we**, **our** or **us**.

Travel Advantage is strongly committed to protecting your privacy and complying with your choices. You will be in full control of all data relating to yourself. Both personal and non-personal data is safeguarded according to the highest privacy and data protection standards adopted worldwide. These expressly include the California Consumer Privacy Act 2018 (**CCPA**) and the EU General Data Protection Regulation (**GDPR**).

We strive to make you feel safe when we collect or share your data and therefore, we want to be transparent on how we collect, use, share, and store the information about you and the choices available to you as data subject.

Travel Advantage offers travel- and lifestyle related services through our website located at www.traveladvantage.com. This Privacy Policy relates to all of the Travel Advantage services offered through our platform, including the Lifestyle Mall.

1. Collection and processing of personal data

To offer you the functionalities of the website and for the technical and functional management thereof.

(i) Why?

We strive to make our website easily accessible and to offer you the best possible experience and functionalities. We process technical data of everyone who visits and uses our website in order to manage it and improve its performance. We may also need to process your personal data so that you can save your data (or preferences such as language and currency) to configure your device to give you a personalized experience. The functionalities of the website are largely made available through the use of cookies. You can read more about our use of cookies in our Cookie Policy.

(ii) How?

We process your personal data for this purpose based on your consent. Upon visiting our website, you will be prompted to consent to the use of cookies. It is also possible to refuse all cookies, although this may affect the functionalities of the website. There are certain cookies, those indicated as 'necessary' that we do not need your consent for, and these will be used by default.

(iii) What?

We process all personal data that you have entered on our website or that is generated by the use of our cookies, including your IP address and which internet browser you use.

(iv) How long?

Storage for this purpose differs per cookie. Please read more on cookies below. However, data gathered for this purpose shall never be stored for longer than 2 years.

For answering your questions and handling complaints

(i) Why?

If you contact us at our office, whether via email or phone, through a contact form, or via the live chat on the website, we will use your personal information to answer your question or to handle a complaint.

(ii) How?

We process your personal data based on consent and legitimate interest. Where possible, we will ask for your consent before you contact us, such as through the contact form. In any other case, our legitimate business interest is formed by our intention to handle your complaints and questions carefully in order to properly run and improve our business.

(iii) What?

We process your name, contact details, your correspondence with us about your question or complaint and all other personal information that is required to answer your question or handle your specific query and/or complaint. If you include any further personal data in any message or correspondence with us, we may process this as well.

(iv) How long?

We keep your personal data for as long as necessary to complete your request or handle the complaint, plus an additional month, after which the data will be removed from our systems.

For relationship management and marketing

(i) Why?

We may use the information provided by you when you contract to use our services for marketing purposes, such as the provision of newsletters. We use your personal data for the development, execution and analysis of market research and marketing strategies. Finally, we may use anonymized data to analyse our services and publish the results on our website or otherwise.

(ii) How?

We process your personal data for this purpose based on your consent. You can withdraw your consent at any time. Under certain circumstances we may process personal data for this purpose without your consent if we have a legitimate business interest to do so.

(iii) What?

For this purpose, we process your contact details such as your e-mail address and personal details such as your name, testimonials, use of our services, contact preferences, and correspondence with us.

(iv) How long?

Personal data is stored for a maximum of 10 years after the termination of our relationship. After this period, your personal data will be deleted from our systems.

To set up an account for you on our website

(i) Why?

In order for you to make the best use of our services, we will set up your account on the Travel Advantage website. Please read below under Section 4 about the sharing of data with third parties.

(ii) How?

Data will be processed on the basis of your consent. We also process data for this purpose based on our contract with you, which is established once you accept the applicable Terms of Use. Finally, personal data is processed where this is in our legitimate business interest.

(iii) What?

We will process your contact details such as your email address, address, and phone number; and personal details such as your name and preferences. When setting up your own profile, you may choose to provide further personal data, such as a bio, profile image, country flag, and further details you willingly choose to include.

(v) How long?

We will retain your personal data for this purpose for as long as you maintain your relationship with us, and for at least 7 years.

To process your payment

(i) Why?

When you sign up to become a Travel Advantage member, we need to be able to perform our legal obligations in order to deliver our services to you and to establish the commercial relationship. We process your personal data to execute your subscription, process your payment, and for administrative purposes such as sending invoices.

(ii) How?

Data will be processed on the basis of your consent. We also process data for this purpose on the basis of our contract with you, which is established once you accept the applicable Terms of Use. Finally, personal data is processed where this is in our legitimate business interest.

(iii) What?

For this purpose, we process your contact details such as your address, telephone number and e-mail address, personal data such as name, payment and credit information, order history and other data stored in our database with all relations of Travel Advantage.

(iv) How long?

Your personal information will be stored for up to 7 years after the end of our relationship with you. After this period your personal data will be deleted from our systems.

Processing of personal data for legal purposes

In some circumstances, we need to process personal data for regulatory investigations and compliance purposes. This also helps to keep our website and services safe and secure. Among other things, we want to prevent fraud and illegal activity through our services.

2. The categories of personal data we collect

As set out above under Section 1 of this Privacy Policy, the personal data we collect and process can be organized under the following categories. These categories are as specified under the CCPA but will apply equally to all users irrespective of their location.

- **A.** Identifiers such as your first and last name, date of birth, email address, and IP address;
- **B.** Contact details such as your phone number and address;
- **C.** Financial, medical, or health details such as your bank account number or payment card number;
- **D.** Internet or other electronic network activity such as the device you use and the usage of our website;
- **E.** Commercial details such as your booking and/or purchase information and order history.
- **F.** Geolocation data such as your physical location;
- **G.** Inferences such as analytics and language/currency preferences;

3. Our use of cookies

Travel Advantage uses cookies on its website. A cookie is a small and simple file that can be stored on the hard drive of a computer. The cookies used by Travel Advantage are only temporary, not permanent.

If you want to learn more about the cookies we use on our website, please visit 'Cookie Settings' on our website to access the cookie banner. Here, we have listed all the cookies that are active on the website, and you can indicate your preferences.

You can set your browser to inform you as soon as you receive a cookie or to deactivate cookies. This might mean that our websites may not function optimally.

We give you the possibility to give your consent to the use of cookies when you first access the website. If you, at a later point in time, wish to disable these cookies, you can follow the instructions below. You can also set your browser to notify you as soon as you receive a cookie or to deactivate cookies. In doing so, it is possible that our website will not function optimally.

Here we offer some specific information about cookies for the most commonly used browsers, and more specifically, how to disable these:

Cookies and Internet Explorer, see: https://privacy.microsoft.com/en-us/privacy#maincookiessimilartechnologiesmodule

Cookies and Firefox, see: https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences
Cookies and Google Chrome, see:
https://policies.google.com/technologies/managing?hl=en
Cookies and Safari, see: https://www.apple.com/legal/privacy/en-ww/cookies/
Cookies and Opera, see: https://help.opera.com/en/latest/web-preferences/

4. Which third parties get access to your personal data?

Within Travel Advantage, our employees, contractors, agents and directors have access to personal data, but only to the extent necessary to properly perform their individual tasks. Where necessary, these individuals are bound to the necessary privacy, confidentiality, and data protection obligations.

Travel Advantage only shares personal information with third parties if it is necessary to serve the applicable purpose as set out above. When a third party processes your personal data, this is only possible according to the instructions of Travel Advantage. By accepting this Privacy Policy, you consent to such use of your personal information by these third-party service providers. They therefore act as our data processor. In all cases, we will ensure that third parties with access to your personal information have implemented appropriate technical and organizational measures to maintain our intended level of privacy and security. We will conclude the necessary agreement with the data processor(s), whereby we include obligations to ensure that your personal data is only processed so that the data processor can fulfil his duty to provide services to us.

Under these conditions, the following third parties will have access to your personal data:

- Information regarding your use of the website and other information gathered through cookies is shared with web analytics, session recording, and online marketing services. Read more about the use of cookies in our Cookie Policy.

- As part of our services, we will set up an account for our members with our business partner Travel Advantage. Details shared with Travel Advantage include your full name, contact details, payment details, and any other details you have provided through the sign-up form on our website.

- To support our operations, we make use of service providers. These service providers have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. They may track your online behavior over time and across different internet websites or online services.

- Payment service providers will collect and process personal data to assist with transactions that take place on our website.

- We use professional advisors such as insurers, consultants, and legal professionals.

In all other cases, your personal information will not be provided to third parties, unless required by law.

5. Transfer of your personal data

For EU users, whenever we transfer your personal data to countries outside of the European Economic Area (EEA), we will do so in accordance with the GDPR. Any party located outside of the EEA will have to enter into the EU Standard Contractual Clauses alongside any data processing agreement they enter into.

6. How do we secure your personal data?

Your personal data is stored securely at all times. We value the protection of your privacy. We have therefore taken strong security measures to protect your data from loss, misuse, unauthorized access, disclosure, alteration, or destruction. We further ensure that personal data will only be accessible to those individuals within our business who are authorized based on their function.

We have implemented technical and organizational measures to guarantee your safe visit to and use of our website. These measures include computer security and protected files and facilities. We regularly make backups. Your connection to the website is safe through activation of Secure Socket Layer (SSL).

Travel Advantage has processes in place to prevent, identify, report, and handle data protection breaches. However, in the event that a breach occurs, Travel Advantage will, without undue delay and if possible, within 72 of becoming aware of the breach, report said breach to the appropriate data protection authority.

7. What are your rights?

As the owner of the personal data, you have the following rights:

- **Right of access**: You have the right to receive a copy of the personal information we hold about you to verify that we are lawfully processing the data.

- **Right to correction**: You may request any incomplete or incorrect information that we may have about you to be corrected or supplemented.

- **Right to be "forgotten"**: If there is no good reason to keep your personal information, we will stop processing. You also have the right to ask us to delete your personal information.

- **Right to limit the processing of your personal data**: You can submit a request not to process your personal data, either temporarily or permanently.

- **Right to portability**: You can submit a request to transfer your personal data to a person or institution designated by you.

- **Right to object to processing**: Under certain circumstances you can object to the processing of personal data altogether.

- **Right to withdraw consent**: You also have the right to withdraw your previously granted permission to process your personal data or to object to the processing of your personal data by Travel Advantage.

- The right to **non-discrimination** when you exercise any of your rights.

- If you are a California resident, you may request us to disclose to you:
    - The categories of personal information we have collected about you
    - The categories of sources from which the personal information is collected
    - The business or commercial purpose for collecting or selling your personal information
    - The categories of third parties with whom we share personal information
    - The specific pieces of personal information we have collected about you

Every request is subject to applicable law, which means that we may have to store the personal information.

If you want to exercise any of your rights as set out above, you can do so by contacting us at:

member@traveladvantage.com

We also want to remind you that you may always issue a complaint to the relevant Data Protection Authority if you have concerns about our processing of your personal data.

8. Minors

We insist on not processing any personal data of children under the age of 18. We strongly encourage you to inform us if you have reason to believe we process the personal data of a minor. We will delete this personal data instantly.

9. External links

Our website may display links to other websites when we believe that doing so will provide value to the viewer. Unless these other websites are affiliated with Travel Advantage, we are not responsible for the privacy policies that these other websites use, nor for its content and security. We advise you to inform yourself by reading the privacy policies on these websites.

We work with trusted partners who maintain strict privacy and data protection policies, and their policies may be different from the terms provided here. For more information on our visa service partner, visit https://ivisatravel.com.

10. Changes to this privacy policy

We reserve the right to make changes to this Privacy Policy at any time. We will notify you when updates are made to give you an opportunity to withdraw previously given consent or to deny further use of your data. We may have to update the Privacy Policy in case of new developments, activities, online services or when applicable legislation changes. Your continued use of this website or our service and/or continued provision of information to us will be subject to the terms of the then-current Privacy Policy.

11. Questions or comments?

If you still have any questions or comments after reading this Privacy Policy, or if you have any suggestions regarding its content, you can always contact us at:

- **Email:** member@traveladvantage.com
- **Website:** www.traveladvantage.com

Please let us know if, for any reason, you believe we have not adhered to the principles in this Privacy Policy. We will do our best to promptly make corrections.