

4theTravel.com Limited

Marketing Privacy Statement

Last Updated: April 2019

This privacy statement provides an overview of how 4theTravel.com Limited ('4theTravel') collects, uses, stores and otherwise process information about you, as well as your choices, as you use the 4theTravel's services for the purpose of processing and booking travel including reservations with airlines, hotels, transportation companies, frequent flyer programs. ('the Services').

(I) PERSONAL DATA COLLECTED

'Personal data' means any information relating to you to process the Services. As a general matter, Personal Data includes the following categories of data:

- (1) Personal profile data, such as name, gender, nationality, email address, mailing address, identification documents, date of birth, profession, contact information, travel preferences for related connected services
- (2) Organizational information such as employee identification
- (3) Expense and travel related data such as credit card or bank account information
- (4) Mobile data, such as mobile device information and, when enabled, location data
- (5) Data for associated connected services to support travel needs, such as loyalty program or rewards numbers, airlines or hotels.

You provide Personal Data when you use the Services at the direction or with permission of your Company.

The Services also connect to third party partners and suppliers like airlines, hotel wholesalers or visa application service providers. Each of these connected services may enable Personal Data about you to be transferred by the 4theTravel.

Certain carriers, including airlines, are required by the laws of the United States and of several other countries to give border control and other government agencies access to passenger personal information. Any personal information 4theTravel holds about you and your travel arrangements may be disclosed to such carriers and may also be provided to law enforcement, immigration, customs and intelligence authorities of any country in your itinerary or in which you land or in whose airspace you travel through.

For travel to or through the United States, 4theTravel is required to transmit personal information about you to the US Transportation Security Administration ('TSA'). Providing this personal information is required. If it is not provided, you may be subject to deny transport or authorization. The TSA may share information that you provide with law enforcement or intelligence agencies or others under its record notice. For more information on TSA privacy policies or to view the records notice and the privacy impact assessment see the TSA's website at www.tsa.gov.

(II) HOW PERSONAL DATA IS USED

4theTravel will use Personal Data within the scope of the Services for the following:

Processing and completing transactions within the scope of the Services, such as creating flight reservation, hotel accommodation and visa application etc.

Providing customer service and support, providing you with transactional communications, such as submission or booking confirmations, providing itinerary updates, security alerts and support and administrative messages providing you with information and support for related to the Services to you under your Company's agreement.

Investigating and preventing fraudulent transactions, unauthorized access or other security incidents, and other illegal activities.

(III) HOW PERSONAL DATA IS SHARED

Personal Data held by 4theTravel will be kept confidential but 4theTravel as a travel agent may provide such information to the following parties (whether within or

outside the Hong Kong Special Administrative Region) for the purposes of providing the Services:

- (1) Airlines and its affiliates;
- (2) Hotels and its affiliates; and
- (3) Transportation companies.
- (4) Visa application

4theTravel does not sell or rent your Personal Data to third parties for marketing purposes unless you have separately granted us permission to do so.

4theTravel may also share Personal Data to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of agreements, respond to legal orders or process, or as otherwise required by law, as permitted under our agreement for the Services.

(IV) SECURITY AND RETENTION OF PERSONAL DATA

4theTravel uses appropriate standard organizational security measures to protect Personal Data from unauthorized disclosure and will retain Personal Data in active databases for varying lengths of time depending upon the specific Services, type of data and applicable law. Organizational security including:

- (1) coded lock to avoid unauthorized persons and intruders to the office. Password of the lock will be changed on a regular basis.
- (2) trained and experience staff to handle personal data processing. Individual password is adopted to prevent unauthorized access of personal data
- (3) Disclosure of personal data will only be handled by our Manager with the permission of the data subject and his/her Company
- (4) Acronis backup solution provides speedy recovery of data in case of the failure of hardware.

You can request from 4theTravel that 4theTravel restricts your Personal Data from any further processing in any of the following events : (i) you state that the Personal Data about you is incorrect, (but only for as long as we are required to check the accuracy of the relevant Personal Data), (ii) there is no authorized or legal basis for us

processing your Personal Data and you demand that we restrict your Personal Data from further processing, (iii) we no longer require your Personal Data but you claim that you require us to retain such data in order to claim or exercise legal rights or to defend against third party claims or (iv) in case you object to the processing of your Personal Data by us, where based on our legitimate interest, for as long as it is required to review as to whether we have a prevailing interest or legal obligation in processing your Personal Data.

(V) CONTACTING 4THETRAVEL

It is your responsibility to keep your personal information accurate and complete at all times. 4theTravel will not be liable for any missing personal information or for false or incorrect personal information provided by you. You have the right to at any time request a copy of your personal information held by the 4theTravel and to have such personal information corrected if it is inaccurate.

If 4theTravel changes this privacy statement, 4theTravel will post those changes and change the 'last updated' date above. 4theTravel may do this at any time without notice. If you have questions or concerns regarding this privacy statement, you must first contact your Company. If you do not receive acknowledgement of your inquiry, you may direct your inquiry to your travel consultant at 4theTravel.

If you have any questions about this Privacy Statement, please contact us at the following address:

4theTravel.com Limited
Rm. 901 Hing Yip Commercial Building
272-284 Des Voeux Road Central
Hong Kong

Attention: Mr. Clement Yee