

PRIVACY POLICY

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Last updated June 2021

WHO ARE WE?

Barrhead Travel and its trading divisions – Barrhead Business Travel, Cruisedirect.co.uk, The-Cruise-Specialists.co.uk, CanadaTravelSpecialists.co.uk, Flightsdirect.com and Brilliant Travel are all part of Travel Leaders Group LLC.

Travel Leaders Group Holdings, LLC (d/b/a Internova Travel Group) (“Internova,” “we,” “us,” “our” or the “Company”) make up a global travel services company that serves corporate and individual client travel needs through various travel related offerings and services (the “Services”). We created this privacy policy (“Privacy Policy”) because we know that you care about how information you provide to us is used and shared. In order to deliver our Services to you, it is necessary for us to collect and use your Personal Information. This Privacy Policy explains the conditions under which and the purposes for which (i) we collect and use your Personal Data in connection with the provision of our Services and through your use of our Company websites (“Site(s)”) and (ii) we may share or disclose your Personal Data to third parties, as well the choices and means, if any, we offer you for limiting the use and disclosure of your Personal Information. We will not use or share your Personal Information except as described in this Privacy Policy. This Privacy Policy was last updated on June 1, 2021 and applies to the Travel Leaders Group, LLC brands listed [here](#).

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The server(s) that make(s) this Site available may be located outside the country from which you accessed this Site, but we will collect and use Personal Information only in accordance with this Privacy Policy and as required by local law in the places in which we operate. Our European Union Privacy Policy can be found in the [UK & European Union Privacy Policy](#) section of this Privacy Policy.

1. INFORMATION WE COLLECT

We collect Personal Data about you when you use our Site(s) or in providing our Services to you. “Personal Data” consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g. cookies identifiers and your IP address) or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

A) COLLECTION OF PERSONAL INFORMATION

We may collect different types of Personal Data: “Technical Information” and “Personal Information.” Your Personal Information, and that of your travel companions, is provided to us either directly by you or through an employer or travel sponsor (as the case may be), in order to provide you with the Services you have requested and typically consists of your full legal name, email address, mailing address, telephone number and credit card number or other payment information. We may also collect other Personal Information in order to assist you with your travel plans, including but not limited to, passport number, driver’s license or

other government-issued identification number, date of birth, gender, arrival and departure locations and times, airline, hotel or car rental frequent loyalty numbers, known traveler and global entry number, and other related travel information.

We may also collect information about your location when you use certain of our services, particularly certain apps. Such apps collect location data to display the real-time risk alerts and personalized assistance notification features, even when the app is closed and not in use. The types of location data we collect depend in part on your device and account settings. You can change this later by going to the device settings.

B) COLLECTION OF TECHNICAL INFORMATION

Information We Collect Through Automatic Data Collection Technologies

We collect other information “**Technical Information**”, such as your IP address, search terms, and site pages you visit while on our Site, whenever you visit our Site, use our services, or view our online advertisements. The technologies we use for this automatic data collection may include cookies and log data.

You can learn more about how we use cookie data by reviewing our [Cookie Policy](#), which can be found in section 9 of this Privacy Policy.

Whenever you use a website, mobile application, or other internet service, certain information is created and retained by the website or application. This happens with our Site as well. We collect Technical Information when you use our Site, or information that has been made anonymous, such as:

- **Log data:** Our servers automatically record information when you use our Site, such as your IP address, the type of browser you are using and its settings, the third party website you visited immediately prior to accessing our Site, the operating system you are using, the domain name of your Internet service provider, the search terms you use on our Site, the specific Site pages you visit, type of product selected, the brand, order, and product identifications, and the duration of your visits.
- **Cookie data:** A “cookie” is data that a website server stores on your computer. Cookies enable websites to recognize your computer and to “remember” your entries as you move from page to page, or even when you revisit the site from time to time using the same computer.

We may also collect information pertinent to the marketing of our products and services. This information may include marketing channels, User Market IDs (CenterPoint, TNMP, etc.), Site brands and product names, contract terms, financial information and other information.

We collect and analyze this Technical Information to measure the number of visitors to the different sections of our Site, to evaluate how visitors use our Site and to provide you with advertisements that are relevant and useful to you, unless you have told us not to. We also use the information we collect to understand customer needs and trends, to carry out targeted promotional activities, and to generally help us make our Site more useful to visitors.

We may use your Site data by itself or aggregate it with similar information we have obtained from others. We may share your Site data with our affiliates and other third parties to achieve these objectives. You may obtain a list of our affiliates and third parties with whom we share your Site data by contacting us [here](#).

We reserve the right to use Internet Protocol (IP) addresses to identify a visitor when we feel it is necessary to enforce compliance with our Site’s terms and conditions, or to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our Site, or other users; or (d) in an emergency to protect the health and safety of our Site’s users or the general public.

2. HOW WE USE YOUR PERSONAL INFORMATION

If you are a customer, an agent, an employee, or a job applicant, the Personal Information we hold and use is necessary for the performance of the services or independent contractor agreement or other agreement to which you are a party or to perform the services you have otherwise requested.

If you are a prospective customer, the Personal Information we collect and use is necessary for our legitimate interest in providing you with information about the services we offer, and about which you have expressed an interest or that we believe will be of benefit to you. Where appropriate, we will obtain your consent at the time we communicate with you.

In some cases, our purpose for collecting the information is because you have expressly consented to our collection and use of your Personal Information.

We collect your Personal Information for a variety of reasons. You may provide the information to us directly, or through a tool or product provided by us or another company to your employer (in the case of our business clients). We collect your Personal

Information, such as name, address, email address, phone number, and credit card information in order to provide the services you have requested. Other examples of Personal Information that we collect include:

- From employment applicants, we or our service provider will collect contact and identification information, such as name, address, telephone number, e-mail address, date and place of birth, driver's license number and employment history information;
- From travel customers, we may also request information such as your passport and known traveler information, vendor loyalty programs, and other information as deemed necessary by the service provider to fulfill your request, to permit us to provide other ancillary travel services to you and to manage your travel experience.; and
- From business customers, customer relationship information, such as business contact information.

We use the Personal Information we have collected to allow us to evaluate your employment application, to provide the products and services you have chosen, process payments, or to manage and develop our business and operations, including:

- Establishing, managing and terminating business relations with you;
- Reviewing the products and services that we provide to you;
- Informing you of our products and services other than those that you have specifically requested;
- Informing you of products and services carefully selected third parties may wish to offer you;
- Responding to your comments or requests for information;
- Investigating and preventing fraudulent activities, unauthorized access to the services and other illegal activities;
- Protecting us against error, fraud, theft, and damage to our goods and property;
- Enabling us to comply with applicable law or regulatory requirements;
- For any other purposes about which we notify customers and users; and
- For any other reasonable business purpose to which you consent.

If you send us an email with questions or comments, we may use your email address to respond to your questions or comments, and we may save your questions or comments for future reference. We may email you when:

- You have applied for employment with us;
- You request information about or from us;
- It relates to purchases you have made from us (e.g., product updates, customer support, etc.);
- You consented to being contacted by email for a particular purpose;
- We are sending you information about our other products and services, offers, promotions and our newsletters, if this is in accordance with your marketing preferences. However, you will always be able to opt-out of such communications at any time (See the "**Your Choices About the Use of Your Personal Information**" section below).

3. PREFERENCE-BASED ADVERTISING, ANALYTICS AND SERVICES

We do not currently share your information that we collect for preference-based advertising purposes and we do not currently have any plans to do so through this Site.

If we do in the future work with third parties for preference-based advertising, then we will do so in accordance with this section and you can opt-out as explained below. Such third parties may include third party advertising networks and website analysis firms who use cookies and web beacons to collect non-personally identifiable information when you visit our Site and third-party sites. The information collected through cookies and/or web beacons, including your IP address, web browser, pages viewed, time spent on pages, and links clicked, is often used by these advertising networks to serve you with advertisements, while you are on our Site and/or on third party sites, that better reflect your preferences and needs. This information may be used by us and these third parties to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our products and services, and better understand your online activity. For more information on how this type of advertising works, go to [here](#).

4. COLLECTION AND USE OF PERSONAL DATA BY THIRD PARTIES

We may share your Personal Information with one or several of our business partners to make an initial determination of the services you may desire, to process your employment application, or to otherwise facilitate our business operations. We also share your Personal Information as necessary with airlines, hotels and other providers for whose services you have requested our assistance. We may also share your information to protect and defend the rights and property of Company.

A) THIRD PARTY PROVIDERS

We may use third parties to assist in processing your employment applications, fulfilling your service requests, or providing other important information to you. We require all such service providers to act in compliance with this Privacy Policy. We may also share your Personal Information with third parties, including our affiliates, or with employees, agents, consultants and other parties who require the information to assist us to establish, maintain and manage our business relationship with you. Further, we may share your Personal Information with our partners and affiliates to promote other services to you that you might like or to show you ads in which you might be interested.

B) EMAIL COMMUNICATIONS

We may share your email contact information with our partners to assist with marketing our products and services. You may unsubscribe from receiving future commercial email communications from us by clicking the “unsubscribe” link included at the bottom of any marketing emails we send, or by contacting us [here](#). However, we reserve the right to send you transactional emails such as customer service communications in connection with the products or services you have purchased. For security reasons, we do not recommend that you send Personal Information, such as passwords, social security numbers, or bank account information, to us by email.

C) TRANSFER OF ASSETS

We do not sell or lease Personal Information or provide a list of our customers to third parties. However, as we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the information we have about you will be transferred to and used by this acquiring entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

D) LEGAL NECESSITY

Notwithstanding anything herein to the contrary, we reserve the right to disclose any information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, or our Site; or (d) in an emergency to protect the health and safety of our Site’s users or the general public.

5. YOUR CHOICES ABOUT THE USE OF YOUR PERSONAL INFORMATION

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent.
- **Your Contact Information.** If you have previously emailed us and would like us to delete your contact information from our files, please contact us [here](#).
- **Other Information.** If at any point you believe the Personal Information we hold about you is incorrect, you want us to correct or delete that information, or you no longer want us to hold that information or contact you, you can [Contact Us](#) at the email address below.

You may have additional rights concerning your Personal Information if you reside in the European Union. These can be found in the “[UK & European Union Privacy Notice](#)” section of this Privacy Policy.

A) ACCURACY OF PERSONAL INFORMATION

It is important that the Personal Information we hold about you is accurate and current. We require you to keep us informed of changes to your Personal Information. If your registration information changes, please contact us [here](#). We take reasonable steps to verify your identity prior to honoring any such requests to help protect your privacy and security.

B) ACCESSING YOUR PERSONAL INFORMATION

If you want to know what Personal Information we hold about you or wish to change Personal Information that is inaccurate or out of date, or to withdraw your consent to our use of your Personal Information, please contact us [here](#). It may not always be possible to completely remove or modify information in our databases, although we will make reasonable efforts to do so upon your request. We do not control how our partners retain, store and destroy data they have accessed in connection with assisting with providing our services. You should check their websites for more information on their practices.

C) DO NOT TRACK DISCLOSURES

Certain browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for preference-based advertising purposes (“DNT Notice”). Some browsers are, by default, set to provide a DNT Notice, whether or not that reflects your preference. Providing DNT Notice is often touted as a means to ensure that cookies, web beacons and similar technology are not used for preference-based advertising purposes – that is, to restrict the collection of information your online activities for advertising purposes. Unfortunately, given how preference-based advertising works, DNT Notices may not effectively accomplish this goal. For this and a variety of other reasons, with respect to our Site, we do not take any particular action based on browser based DNT Notices. However, we do not use third-party advertisers or engage in behavioral marketing data collection for resale.

6. CALIFORNIA RESIDENTS PRIVACY NOTICE

This Privacy Notice for California Residents supplements the information contained in this Privacy Policy and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the

California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

A) INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal Information”). In particular, we have collected the following categories of Personal Information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other Personal Information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from our clients. For example, from documents that our clients provide to us related to the Services for which they engage us.
- Indirectly from our clients. For example, through information we collect from our clients in the course of providing Services to them.
- Directly and indirectly from activity on our Site and the Sites of Travel Leaders Group's brand companies. For example, from submissions through our website portal or website usage details collected automatically.
- From third parties that interact with us in connection with the Services we perform. For example, from third party travel suppliers.

B) USE OF PERSONAL INFORMATION

We may use or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with Personal Information for us to book travel, we will use that Personal Information to make travel arrangements and provide it to any third-party supplier (hotel, airline, car rental company etc.).
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations, offers and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our Site and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

C) SHARING PERSONAL INFORMATION

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for a business purpose:

Category A:	Identifiers.
Category B:	California Customer Records personal information categories.
Category C:	Protected classification characteristics under California or federal law.
Category I:	Professional or employment-related information.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you authorize us to disclose your personal information in connection with products or Services we provide to you.

In the preceding twelve (12) months, we have not sold any Personal Information.

D) YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

1. Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - sales, identifying the Personal Information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

2. Deletion Request Rights

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

3. Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us [here](#).

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

4. Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

E) NON-DISCRIMINATION

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you Services.
- Charge you different prices or rates for Services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of Services.
- Suggest that you may receive a different price or rate for Services or a different level or quality of Services.

F) CHANGES TO THIS PRIVACY NOTICE

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will notify you through a notice on our Site.

G) CONTACT INFORMATION

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Travel Leaders Group, LLC
Attn: Privacy Office
1633 Broadway, 35th Floor
New York, NY 10019
United States
privacy@internova.com

7. UK & EUROPEAN UNION PRIVACY NOTICE

This Privacy Notice applies to our processing of personal data of UK and EU residents that is covered by the EU General Data Protection Regulation (“**GDPR**”) and is a supplement to our Privacy Policy.

A) Who We Are

Travel Leaders Group Holdings, LLC (d/b/a Internova Travel Group) (“we”, “us”, “Internova” or the “Company”) is a travel services business with principle offices located in New York, New York. The Company, or one of its affiliates as the case may be, is the Controller of your personal data that we have collected. If you wish to read more about our position as a data Controller, please click [here](#).

B) Personal Data

Personal Data is a legal term that describes any information that identifies a particular person and has special meaning under European Union law. For purposes of GDPR, Personal Data is any information that can identify you, either directly or indirectly, such as a name, an identification number, your IP address, data about your location, or information about your physical, physiological, genetic, mental, economic, cultural or social identity. We are providing you this notice because we have collected some of your personal data from you. We collect your Personal Data for a variety of reasons, depending on whether you are an employee, a customer, an agent or a vendor.

C) What is the Legal Basis and Purpose for Holding Your Personal Information?

If you are a customer, an employee, or a job applicant, the Personal Data we hold, and use is necessary for the performance of the services contract to which you are a party or to perform the Services which you have otherwise requested. If you are a prospective customer, the Personal Data we collect and use is necessary for our legitimate interest in providing you with information about the Services we offer and about which you have expressed an interest or that we believe will be of benefit to you. In some cases, our legal basis for collecting your Personal Data is because you have expressly consented to our collection and use of your Personal Information.

D) How Long Do We Keep Your Personal Data?

If you are a customer, applicant for employment, vendor or agent, we will keep your Personal Data on an ongoing basis for so long as we have a legitimate interest to inform you of our Services, or until our contractual relationship has terminated, as the case may be. We are required to retain certain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices.

E) Your Rights as a Data Subject

You have important rights that you may exercise to protect your Personal Data. You may access those rights at any time by contacting us [here](#). You have the following rights concerning your personal data that we hold and process that you can exercise at any time:

- **Right of access:** you have the right to request a copy of the information that we hold about you.
- **Right of rectification:** you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten:** in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing:** where certain conditions apply you have a right to restrict the processing of your data.
- **Right of portability:** you have the right to have the data we hold about you transferred to another organization.
- **Right to object:** you have the right to object to certain types of processing such as direct marketing.
- **Right to judicial review:** if Company refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the process below.

We will not be able to delete information that is required to maintain our business purpose or that is required to facilitate your contract with us or to perform the Services you have otherwise requested from us. All the above requests will be forwarded on to other parties holding and processing your data where appropriate.

For more information about your Personal Data rights for UK residents, please visit the [Information Commissioner Office for the United Kingdom's website](#).

In order to provide your access to your Personal Data, we will need to validate your identity and require that you send an email from the email address account associated with your Personal Data as stored on Company's systems. Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

F) Consent

For certain types of Personal Data, we have asked for your consent to use the data for certain described purposes at the time you provided it. You may withdraw your consent at any time. When you give us your consent, you are giving us permission to process your personal data specifically for the purpose identified in the consent request. Where we ask you for additional personal data, we will obtain your consent to our proposed use of that data where required, and always tell you why and how the information will be used.

You may withdraw consent at any time by contacting us [here](#).

G) Sharing with Third Parties

We may pass your Personal Data on to third-party service providers contracted by us to perform certain Services for us, or to collaborate directly with you. For a complete and up-to-date list of the third parties we are currently using, please contact us [here](#).

Any third parties that we may share your data with are obliged to keep your details secure, and to use them only for the purposes and to complete the tasks identified by Company. When they no longer need your data to fulfill this service, they will dispose of the details in line with Company's procedures. If we wish to pass your personal data onto any additional third parties, we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

H) International Transfer of Personal Data

We may transfer your Personal Data within the Company and/or to other third parties, such as our third-party service providers. Your Personal Data may be transferred to, stored, and processed in a country other than the one in which it was collected. This may include the United States. When we do so, we transfer the information in compliance with applicable data protection laws. In particular, we have implemented safeguards in the form of standard data protection clauses adopted by the European Commission. The safeguards ensure compliance with the data protection requirements of the GDPR as well as your rights appropriate to the processing of your personal data. You can obtain a copy of the standard contractual clauses by contacting us [here](#).

I) Safeguarding Personal Data

Please refer to the [Safeguarding Your Personal Information](#) section above for information about our data security measures.

J) Complaints

If you wish to raise a complaint on how we handle your Personal Data, you can contact us at privacy@internova.com

If you are not satisfied with our response you can contact the Information Commissioner Office for the United Kingdom. Their Help Desk number is **0303-123-1113**.

8. UK NOTICE

In the event of our insolvency we, or any appointed insolvency practitioner, may disclose your personal information to the CAA, and/or ABTA so that they can assess the status of your booking and advise you on the appropriate course of action under any scheme of financial protection.

- [The CAA's General Privacy Notice](#)
- [The ABTA's Privacy Notice](#)

10. COOKIE POLICY

To make this Site work properly, we sometimes place small data files called cookies on your device.

A) What are cookies?

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

B) How do we use cookies?

We use cookies for the following purposes:

- To assist you in navigation of our Sites;
- To help you provide feedback to us;
- To analyze your use of our products, Services or applications.

We use the following cookies and classify cookies in the following categories:

- Strictly necessary cookies;
- Advertising cookies;
- Analytics cookies;
- Performance cookies;
- Session cookies;
- Targeting cookies.

You can opt-out of each cookie category (except strictly necessary cookies).

C) Cookie Privacy Setting

When you visit any web site, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalized web experience. Because we respect your right to privacy, you can choose not to allow some types of cookies. However, blocking some types of cookies may impact your experience of the Site and the Services we are able to offer.

D) Types of Cookies

- **Strictly Necessary Cookies:** These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the Site will then not work. These cookies do not store any personally identifiable information.
- **Advertising Cookies:** Advertising cookies are placed on your computer by advertisers and ad servers in order to display advertisements that are most likely to be of interest to you. These cookies allow advertisers and ad servers to gather information about your visits to the Site and other websites, alternate the ads sent to a specific computer, and track how often an ad has been viewed and by whom. These cookies are linked to a computer and do not gather any Personal Information about you.
- **Analytics Cookies:** Analytics cookies monitor how users reached the Site, and how they interact with and move around once on the Site. These cookies let us know what features on the Site are working the best and what features on the Site can be improved.
- **Personalization Cookies:** Personalization cookies are used to recognize repeat visitors to the Site. We use these cookies to record your browsing history, the pages you have visited, and your settings and preferences each time you visit the Site.
- **Security Cookies:** Security cookies help identify and prevent security risks. We use these cookies to authenticate users and protect user data from unauthorized parties.
- **Site Management Cookies:** Site management cookies are used to maintain your identity or session on the Site so that you are not logged off unexpectedly, and any information you enter is retained from page to page. These cookies cannot be turned off individually, but you can disable all cookies in your browser.

- **Third-Party Cookies:** Third-party cookies may be placed on your computer when you visit the Site by companies that run certain Services we offer. These cookies allow the third parties to gather and track certain information about you. These cookies can be manually disabled in your browser.
- **Performance Cookies:** These cookies allow us to count visits and traffic sources, so we can measure and improve the performance of our Site. They help us to know which pages are the most and least popular and see how visitors move around the Site.

All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and will not be able to monitor its performance. For example, a number of our pages use cookies to remember (i) your display preferences, such as contrast color settings or font size; (ii) if you have already replied to a survey pop-up that asks you if the content was helpful or not (so you won't be asked again); or (iii) if you have agreed (or not) to our use of cookies on this Site. Some videos embedded in our pages use a cookie to anonymously gather statistics on how you got there and what videos you visited.

Enabling these cookies is not strictly necessary for the Site to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features of this Site may not work as intended. The cookie-related information is not used to identify you personally and the pattern data is fully under our control. These cookies are not used for any purpose other than those described here.

E) How to control cookies

You can control and/or delete cookies as you wish – for details, click [here](#). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

10. SAFEGUARDING YOUR PERSONAL INFORMATION

We take the security of your Personal Information very seriously. We have implemented industry-standard security measures to protect against the loss, misuse and alteration of the information under our control. To help ensure the confidentiality of your Personal Information, it is important for you to protect against unauthorized access to your passwords and to your computer. Be sure to sign off and/or log out when finished using a shared computer.

We strive to safeguard Personal Information using methods that are appropriate to the sensitivity of the information. We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the Personal Information under our control. However, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your Personal Information. In the unfortunate event that your Personal Information is compromised, we may notify you by e-mail or U.S. mail to the last e-mail address or postal address you have provided us in the most expedient time reasonable under the circumstances, or as otherwise required by applicable law. We may delay notification as necessary while we take measures to determine the scope of the breach and restore reasonable integrity to our system as well as for the legitimate needs of law enforcement. From time to time we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems.

11. CHILDREN

Our Site is not directed to children. We do not sell products or services for purchase by children. We will not knowingly collect Personal Information from children. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us, please contact us [here](#). A parent or guardian of a child under the age of 13 may review and request deletion of such child's personally identifiable information as well as prohibit the use of that information.

12. THIRD PARTY LINKED SITES

This Privacy Policy does not apply to your use of unaffiliated websites to which our Site is linked. Company is not responsible for the privacy practices or the content on linked sites. We recommend that you carefully read the privacy policies of each site you visit.

13. SOLE STATEMENT

This Privacy Policy as posted on this Site is the sole statement of our Privacy Policy with respect to this Site, and no summary, modification, restatement or other version thereof, or other privacy statement or policy, in any form, is valid unless we post a new or revised policy to the Site.

14. CHANGES TO PRIVACY POLICY

We may from time to time make changes to this Privacy Policy to reflect changes in legal or regulatory obligations or changes in the manner in which we deal with Personal Information. We will post any revised version of this Privacy Policy on our Site. Any changes will be effective on the effective date stated in the revised Privacy Policy. If there are significant changes, we may provide

more prominent notice or obtain your consent as required by law. If you do not wish to accept the changes, you should cease using the Site. Your continued use of the Site after we have posted a revised Privacy Policy indicates your agreement to the revisions.

15. CONTACT US

To get more information about our privacy and information security practices, or if you (a) have questions or comments about our Privacy Policy; (b) wish to make corrections to any Personal Information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your Personal Information with others, contact us [here](#).