

## Privacy Policy Landing

Effective February 09, 2010

Replaced October 4, 2012

Welcome to this **Travelport** Web site (this "**Web Site**"). We at **Travelport** (referred to as "**Travelport**," "**We**," "**Us**," or "**Our**") recognize the importance of protecting the privacy of personally identifiable information ("**Personal Information**") about the individual travelers that we process in and store in Our global distribution systems and about the **users and visitors** of Our Web Site (referred to as "**User**," "**You**" or "**Your**"). The following privacy policy (this "**Privacy Policy**") discloses what information We gather, how We use it, and how to correct or change it (please note, however, that We may update and amend this Privacy Policy from time to time). At Travelport, it is Our intention to give You an understanding about how We collect Your information and the use We make of it in the course of Our business.

### 01. TRAVELPORT GDS

Travelport recognizes that many jurisdictions have adopted data privacy laws that may apply to Personal Information about individual travelers ("**Travelers**") that we process and store in Our global distribution systems ("**GDS Personal Information**"), including Our Apollo, Galileo, and Worldspan global distribution systems (each, a "Travelport GDS"). This section of our Privacy Policy (under the heading "**Travelport GDS**") describes how We collect, use, store, and otherwise process GDS Personal Information about such Travelers.

#### Safe Harbor

We recognize that the European Union has an omnibus data protection regime established by the European Data Protection Directive (95/46/EC) (the "**EU Data Protection Directive**") and that Switzerland has a similar data protection regime. The EU Data Protection Directive and the Swiss requirements generally restrict the transfer to the United States of Personal Information about European Travelers, unless there is "adequate protection" for such information when it is received in the United States. (For these purposes, an "**European Traveler**" is a Traveler whose personal data is entered by a Travelport GDS subscriber located in the EU or Switzerland, regardless of the traveler's nationality or location.) To address this restriction, Travelport adheres to the US-EU and US-Swiss Safe Harbor Privacy framework ("**Safe Harbor**") with respect to such GDS Personal Information about EU Travelers that We receive in the United States.

This section of our Privacy Policy, as well as our participation in the Safe Harbor, does not apply to any travel supplier, such as an airline, car rental company or a hotel (a "**Travel Supplier**"), nor does it apply to any travel agency or other company that subscribes to a Travelport GDS (a "**Subscriber**"). We recommend that Travelers should carefully review the privacy policies of their Travel Suppliers and Subscribers. In addition, our participation in Safe Harbor does not apply to Travelers in non-EU and non-Swiss jurisdictions.

#### Collection, Use, and Disclosure

Travelport obtains GDS Personal Information when a Travel Supplier or a Subscriber submits such data to a

Travelport GDS, as well as when an individual Traveler submits data to Us directly in limited circumstances. The types of GDS Personal Information that We obtain generally includes: name, date of birth, gender, postal address, e-mail address, telephone number, credit card and payment information, travel and accommodation details, passport information, and special travel requests, such as a request for a wheelchair or a special meal.

We use GDS Personal Information to process travel bookings, to provide Subscribers and Travel Providers with access to travel information, to make and change travel reservations, to perform billing and accounting functions related to the travel, to perform internal business processes (such as testing and quality assurance), and to issue tickets and other travel-related documents on behalf of Travelers. We disclose GDS Personal Information to Travel Suppliers and Subscribers, as well as to the processors that act on their behalf, to carry out these activities and to help perform the underlying contracts with Travelers.

We also disclose GDS Personal Information to vendors that perform functions on Our behalf, including suppliers of software development services, business processing service providers, contact center service providers, training service providers, and computer maintenance providers. We require such vendors to maintain appropriate information security protections for GDS Personal Information and to only process such data in accordance with Our instructions.

We may also process and disclose GDS Personal Information as required by law, subpoena, or regulation; when requested by government or law enforcement authorities; for credit card processing, authentication, and fraud prevention; or as otherwise required or permitted by law. We do not sell GDS Personal Information for purposes of allowing third parties to conduct direct marketing for their own products or services.

### **Data Security and Integrity**

Travelport maintains reasonable measures to protect GDS Personal Information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. Travelport also takes reasonable steps, to the extent reasonably possible in the context of Our role as an intermediary, to keep GDS Personal Information reliable for its intended use, accurate, current and complete.

### **Data Retention**

Travelport retains GDS Personal Information no longer than is necessary to comply with legal obligations and to fulfill legitimate business and compliance purposes.

### **Non-Identifiable Data**

Travelport analyzes, uses, discloses, and otherwise processes statistical and other data in non-identifiable (i.e. de-personalized) form that Travelport obtains or generates in connection with its Travelport GDS business. This data is used to identify trends and other activities in the travel industry.

### **Information from Minors**

Travelport GDS services are not intended for use by minors. We do not knowingly collect GDS Personal Information from any minor child.

## Data Access Requests and Other Questions

Travelers should direct any requests to access their own GDS Personal Information, or any other privacy questions, to Travelport at [privacy@travelport.com](mailto:privacy@travelport.com). In practice, Travelers may first wish to contact their Travel Supplier or Subscriber, because that might be the most efficient means of addressing any issues. Travelport retains the right to use reasonable measures to authenticate the identity of any Traveler that requests access to their GDS Personal Information or otherwise raises any questions. In addition, if any European Traveler experiences an issue regarding GDS Personal Information that the European Traveler cannot resolve directly with Travelport, such person may contact their local data protection authority for further information.

Inquiries may be directed to Travelport GDS, One Axis Park, 10 Hurricane Way , Langley, Berkshire, SL3 8AG, United Kingdom, Attention: Chief Privacy Officer, T: +44 (0) 1753 28 8000, F: +44 (0) 1753 28 8001.

## 02. TRAVELPORT.COM WEBSITE

By using Our Web Site, You signify Your agreement to this Privacy Policy. **IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, DO NOT USE THIS WEB SITE.** We reserve the right, in Our sole discretion, to modify, alter or otherwise update this Privacy Policy at any time. Such modifications, alterations, and updates shall be effective immediately upon posting. Your continued use of Travelport's web site following the posting of a modified, altered, or updated Privacy Policy will mean You accept those modifications, alterations or updates. Privacy Policy changes will apply to Personal Information that You submit to Us about You through Your use of Our Web Site ("**Web Site Personal Information**") collected after the date we post the revised Privacy Policy, as well as to existing Web Site Personal Information held by us.

**This Web Site will permit You to link to many other web sites that may or may not be affiliated with this Web Site and/or with Us. The other linked web sites may have different privacy policies that are not the same as Our Privacy Policy, or may not have privacy policies. We encourage You to read the privacy policies (if any) for all such web sites as they may be materially different from this Privacy Policy. Your access to and use of such linked web sites through links provided on this Web Site is governed by the terms and privacy policies of those sites, not this Web Site.**

### What Information Does Travelport Collect?

Travelport gathers two types of information about You: (1) Web Site Personal Information that Users provide through optional, voluntary features of Our Web Site, and (2) data that Travelport gathers through aggregated tracking, mainly by tallying Web pages that are viewed by Users throughout Our Web Site.

### How Does Travelport Collect Information?

#### *Optional or Affirmative Submission*

We collect information by specifically requesting it from You. Generally this occurs when You register at the Web Site or request information or a service. We also collect information that You affirmatively provide to Us. Usually, We and Our business partners use Your information to operate the Web Site and to deliver products and/or

services. Travelport also uses Your information to inform You about other products and/or services available from Travelport.

### **Use of Tracking**

**Use of Internet Protocol ('IP') Addresses:** An IP address is a unique number that is automatically assigned to Your computer whenever You are surfing the Internet so that Your computer can be identified by the main computers, known as "Web servers," that "serve up" Web pages. This allows Us to identify and gather general information and data about You, such as the Web pages You view. When Users request Web pages from Our Web Site, Our Web servers log the User's IP address. For example, We collect and/or track the home server domain name, the type of computer, and the type of Web browser used by You to access this Web Site.

We can, and will, use IP addresses to identify You when We feel it is necessary to enforce compliance with Our Web Site Terms of Use or to protect Our service, site, Users, or others

### **Use of Cookies**

**What are cookies?** Cookies are small pieces of information that a web site sends to Your computer for record-keeping purposes, which information is stored in a file on Your computer's hard drive. Cookies make Web-surfing easier for You by saving Your preferences so that We can use the saved information to facilitate Your use of Our Web Site when You return to the Web Site. The use of cookies appears to be an industry standard, and as such, You will find that most major web sites use them. By showing how and when Users use the Web Site, cookies help Us see which areas of the Web Site are popular and which are not. Many improvements and updates to the Web Site are based on such data as total number of visitors and pages viewed. This information is most easily tracked with cookies.

Most cookies expire after a defined period of time, or You can delete Your cookie file at any time. Most Web browsers are initially set up to accept cookies. You can reset Your Web browser to refuse cookies or to indicate when a cookie is being sent. However, note that some parts of Travelport's services will not function properly or may be considerably slower if You refuse cookies. For example, without cookies, You will not be able to set personalized preferences, and/or may have difficulty completing marketing transactions.

Travelport has two (2) primary uses for cookies. First, We use them to specify a User's preferences. Second, We use cookies to track web site usage trends and patterns. This helps Us understand Our Users' needs better and improve areas of Our Web Site. While both of these activities depend on the use of cookies, You have the option of disabling (refusing) the cookies via Your Web browser preferences.

You may occasionally get cookies from Our business partners, including Our affiliates. Travelport does not control these cookies. The use of advertising cookies sent by such third-party Web servers is standard in the Internet industry.

### **With Whom Does Travelport Share Information?**

The following describes some of the ways that any Web Site Personal Information may be disclosed.

#### **Business Partners & Sponsors:**

Travelport may disclose some or all of Your Web Site Personal Information to business partners or sponsors. Many promotions offer opportunities to request additional information from sponsors.

**International Transfers of Web Site Personal Information:**

The Internet is a global environment and, as such, using the Internet to send, collect and process Information may involve transmitting it internationally. Therefore, by browsing this Web Site, and/or by sending Information to Us, you acknowledge and agree that we may transmit and use Web Site Personal Information you provide to Us, to and at our locations, affiliates, business partners and sponsors located outside Your country and outside Your continent. The countries that Your Web Site Personal Information may be transferred to may have laws that are not equivalent to the laws of Your country.

**Third Party & Aggregate Data:**

From time to time, You may be offered the opportunity to receive materials or special offers from third parties. Travelport may share Your name and e-mail address with such third parties. Travelport may match Web Site Personal Information with third party data. Also, Travelport may keep track of what portions of the Web Site Users are visiting and other User statistics, and aggregate this information to help Us create a better experience for Users of Our Web Site. This is all done in order to describe Our viewers and services to prospective partners, advertisers, and other third parties, and for other lawful purposes.

**Other:**

Travelport may also disclose Web Site Personal Information in special cases when We have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating Our Terms of Use, or may be causing injury to or interference (either intentionally or unintentionally) with any of Travelport's rights or property, other Users, or anyone else. Travelport may disclose or access account information when We believe in good faith that the law requires it and for administrative and other purposes that We deem necessary to maintain, service, and improve Our products and services. In addition, if Travelport or its assets of Travelport are acquired, your Web Site Personal Information will likely be transferred or disclosed in connection with such acquisition.

**How Can You Control the Usage Of Information?**

In case You change Your mind or some personal information changes (such as Your zip code or e-mail address), We will try to provide a way to correct, update or remove the personal information that You give us. We also give You the opportunity to control the communications We direct to You.

If You have any questions about this Privacy Policy, or if You wish to update personal information, object to any usage provided herein for any reason or would like to Opt-Out of any disclosure of Web Site Personal Information to third parties for the third parties' direct marketing purposes, You may contact Us at: [privacy@travelport.com](mailto:privacy@travelport.com).

**What Happens When You Link to Other Sites or Participate in Message Boards?**

You should be aware that when You are on Travelport's Web Site You can hyperlink, or be directed to, other web

sites of our affiliates and of third parties that are beyond Our control and/or outside Our service. For example, if You "click" on a banner advertisement or a Travelport search result, the "click" may transfer You off Our Web Site. These other web sites may include sites of advertisers, sponsors, and partners that may use Our logo as part of a co-branding agreement. These other web sites may send their own cookies to Users, collect data, or solicit Information.

Travelport does not control such web sites, and, therefore, is not responsible for their contents or the hyperlinks or advertising they choose to place on such web sites. Travelport's inclusion of hyperlinks to these web sites do not imply any endorsement of the material on such web sites or any association with their operators. Our Privacy Policy does not extend to anything that is inherent in the operation of the Internet, which is beyond Travelport's control.

Please keep in mind that whenever You give out information on-line (for example, via message boards or forums) that information can be collected and used by people You do not know. Travelport cannot guarantee the security of any information You disclose on-line, and You disclose such information at Your own risk.

#### **Is Information Secure from Others Using the Travelport Web Site?**

The security of all information associated with Our Users is an important concern to Us. We exercise care in providing secure transmission of Your information from Your computer to Our servers. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, Travelport can't ensure or warrant the security of any information You transmit to Us or from Our on-line products or services, and You do so at Your own risk.

#### **A Warning about Phishing**

Identity theft and the practice currently known as "phishing" pose security threats. For more information about phishing, you may want to visit the Federal Trade Commission at <http://www.onguardonline.gov/phishing.html>.

#### **For How Long Will Your Information Be Retained?**

Travelport will archive the Web Site Personal Information provided by You, and such Web Site Personal Information will be retained by Us in accordance with applicable law.

### **03. EFFECTIVE DATE**

Effective Date: This policy was last updated on February 09, 2010.