

Additional Privacy Disclosures for the United States California and Nevada

Additional Privacy Disclosures for California Residents

Pursuant to the California Consumer Privacy Act (“CCPA”) effective January 1, 2020, TravelClick, Inc. (“we” or “TravelClick”) by means of this notice (the “Notice”) we are providing the following details regarding personal information (as defined in the CCPA) about travelers, website users and business partners who are California residents that we have collected or disclosed within the preceding 12 months. This Notice supplements TravelClick’s privacy notices.

Categories of Personal Information Collected

We collected the following categories of personal information:

- A. Identifiers, such as name, contact information, online identifiers, email address, account name and other government-issued identifiers;
- B. Personal information, as defined in the California customer records law, subdivision (e) of Section 1798;
- C. Commercial information, such as transaction information and transaction history;
- D. Internet or network activity information, such as browsing history and interactions with our website;
- E. Geolocation data, such as device location and IP location; and
- F. Professional or employment-related information, such as work history and prior employer.

We may use this personal information for the following business purposes: (i) to operate, manage, and maintain our business, (ii) to provide our products and services, and (iii) to accomplish our business purposes and objectives, including, for example, using personal information to develop, improve, repair, and maintain our products and services and to fulfill your requests; personalize, advertise, and market our products and services; conduct research, analytics, and data analysis; maintain our property; undertake quality and safety assurance measures; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit, and other internal functions, such as internal investigations; to carry out corporate transactions, such as mergers, joint ventures or acquisitions; comply with law, legal process, and internal policies; maintain records; and exercise and defend legal claims.

Disclosures Made to Third Parties

We disclosed the following personal information to third parties such as our service providers and affiliates for our operational business purposes:

- A. Identifiers, such as name, contact information, online identifiers, email address, account name and other government-issued identifiers;
- B. Personal information, as defined in the California customer records law, subdivision (e) of Section

1798;

C. Commercial information, such as transaction information and transaction history;

D. Internet or network activity information, such as browsing history and interactions with our website;

E. Geolocation data, such as device location and IP location; and

F. Professional or employment-related information, such as work history and prior employer.

“Sales” of Personal Information

We have not “sold” in the past 12 months your personal information nor will we do so without first revising this Notice.

For purposes of this Notice, “sold” or “sale” means the disclosure of personal information for monetary or other valuable consideration to another business or a third party for monetary or other valuable consideration but does not include, for example, the transfer of personal information as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of our business.

However, we do allow third parties to collect personal information through our services and share personal information with third parties for the business purposes we’ve described in this Notice. For more information, please refer to the relevant TravelClick privacy notice.

Access Requests

If you are a California resident, you may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of personal information we collected about you and the categories of sources from which we collected such personal information;
- The specific pieces of personal information we collected about you;
- The business or commercial purpose for collecting personal information about you;
- The categories of personal information about you that we otherwise shared or disclosed, and the categories of third parties with whom we shared or to whom we disclosed such personal information (if applicable).

To make such a request, please contact us in accordance with the “Contacting Us” section below. In some instances, we may decline to honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another California resident.

Deletion Requests

If you are a California resident, you may request that we delete personal information we collected from you. To make such a request, please contact us in accordance with the “Contacting Us” section below. In some instances, we may decline to honor your request where an exception applies, such as when we need the information to complete a transaction for which the personal information was collected or when the disclosure of personal information would adversely affect the rights and freedoms of another California resident.

Unlawful Discrimination

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

Additional Privacy Disclosures for Nevada Residents

We do not sell Covered Information as defined under Nevada law.

Contacting Us

For additional information on any of the above, or to submit a request for personal information under the CCPA, you may contact us at privacypolicy@travelclick.com

Updates

This Notice is published by TravelClick and may be changed at any time, subject to applicable legal requirements to notify you or obtain your consent. The date it was last updated is **27th, December 2019**.