



corporate travel
management

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COLLECTION OF YOUR PERSONAL INFORMATION.

Corporate Travel Management North America Inc. and its related bodies listed above collects personally identifiable information, such as your e-mail address, name, home or work address or telephone number. Corporate Travel Management North America Inc. also collects anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences, interests and favorites. There is also information about your computer hardware and software that is automatically collected by Corporate Travel Management North America Inc. This information can include: your IP address, browser type, domain names, access times and referring Web site addresses.

This information is used by Corporate Travel Management North America Inc. for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Corporate Travel Management North America Inc. Web site.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through Corporate Travel Management North America Inc. public message boards, this information may be collected and used by others. Note: Corporate Travel Management North America Inc. does not read any of your private online communications.

Corporate Travel Management North America Inc. encourages you to review the privacy statements of Web sites you choose to link to from Corporate Travel Management North America Inc. so that you can understand how those Web sites collect, use and share your information. Corporate Travel Management North America Inc. is not responsible for the privacy statements or other content on Web sites outside of the Corporate Travel Management North America Inc. and Corporate Travel Management North America Inc. family of Web sites.

USE OF YOUR PERSONAL INFORMATION.

Corporate Travel Management North America Inc. collects and uses your personal information to operate the Corporate Travel Management North America Inc. Web site and deliver the services you have requested. Corporate Travel Management North America Inc. also uses

your personally identifiable information to inform you of other products or services available from Corporate Travel Management North America Inc. and its affiliates. Corporate Travel Management North America Inc. may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered.

Corporate Travel Management North America Inc. does not sell, rent or lease its customer lists to third parties. Corporate Travel Management North America Inc. may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, Corporate Travel Management North America Inc. may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to Corporate Travel Management North America Inc., and they are required to maintain the confidentiality of your information.

Corporate Travel Management North America Inc. does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent.

Corporate Travel Management North America Inc. keeps track of the Web sites and pages our customers visit within Corporate Travel Management North America Inc., in order to determine what Corporate Travel Management North America Inc. services are the most popular. This data is used to deliver customized content and advertising within Corporate Travel Management North America Inc. to customers whose behavior indicates that they are interested in a particular subject area.

Corporate Travel Management North America Inc. Web sites will disclose your personal information, without notice, only if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Corporate Travel Management North America Inc. or the site; (b) protect and defend the rights or property of Corporate Travel Management North America Inc.; and, (c) act under exigent circumstances to protect the personal safety of users of Corporate Travel Management North America Inc., or the public.

USE OF COOKIES.

The Corporate Travel Management North America Inc. Web site uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize Corporate Travel Management North America Inc. pages, or register with Corporate Travel Management North America Inc. site or services, a cookie helps Corporate Travel Management North America Inc. to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Corporate Travel Management North America Inc. Web site, the information you previously provided can be retrieved, so you can easily use the Corporate Travel Management North America Inc. features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you

choose to decline cookies, you may not be able to fully experience the interactive features of the Corporate Travel Management North America Inc. services or Web sites you visit.

SECURITY OF YOUR PERSONAL INFORMATION.

Corporate Travel Management North America Inc. secures your personal information from unauthorized access, use or disclosure. Corporate Travel Management North America Inc. secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as a credit card number) is transmitted to other Web sites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

PRIVACY SHIELD COMPLIANCE.

Corporate Travel Management North America Inc. complies with the [EU-US Privacy Shield](#) Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Corporate Travel Management North America Inc. has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

In compliance with the EU-US Privacy Shield Principles, Corporate Travel Management North America Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact Corporate Travel Management North America Inc. at: NABOS.MIS@TravelCTM.com. Corporate Travel Management North America Inc. has opted to resolve disputes by committing to cooperate and comply with [EU Data Protection Authority \(DPA\) Panels](#).

The Privacy Shield will be administered by the Department of Commerce, which has committed to stepping up compliance and oversight activities compared to those under the previous Safe Harbor regime, and conducting regular reviews of participating companies. The Federal Trade Commission (FTC) and Department of Transportation (DOT) are the enforcement authorities which share joint jurisdiction over Corporate Travel Management North America Inc.'s Privacy Shield, according to their jurisdictions. Under certain limited conditions, individuals may invoke binding arbitration before the Privacy Shield Panel to be created by the U.S. Department of Commerce and the European Commission.

As a consumer, you have the right under Privacy Shield to access, correct, or delete your personal data. Corporate Travel Management North America Inc. Web sites will disclose your personal information, without notice, only if required to do so (a) in response to a lawful request by public authorities, including to meet national security or law enforcement requirements; (b) conform to the edicts of the law or comply with legal process served on Corporate Travel Management North America Inc. or the site; (c) protect and defend the rights or property of Corporate Travel Management North America Inc.; and, (d) act under exigent circumstances to protect the personal safety of users of Corporate Travel Management North America Inc., or the public. Corporate Travel Management North America Inc. acknowledges potential liability in cases of onward transfer to third parties. CTM does not disclose personal information to third parties without the express written consent of the individual. The individual may opt out of any personal data disclosure by submitting an electronic request to: NABOS.MIS@TravelCTM.com.

CHANGES TO THIS STATEMENT.

Corporate Travel Management North America Inc. will occasionally update this Statement of Privacy to reflect company and customer feedback. Corporate Travel Management North America Inc. encourages you to periodically review this Statement to be informed of how Corporate Travel Management North America Inc. is protecting your information.

CONTACT INFORMATION.

Corporate Travel Management North America Inc. welcomes your comments regarding this Statement of Privacy. If you believe that Corporate Travel Management North America Inc. has not adhered to this Statement, please contact Corporate Travel Management North America Inc. at nabos.mis@travelctm.com. We will use commercially reasonable efforts to promptly determine and remedy the problem.