



Last Updated: July 1, 2023

IP Travel, as controller of your personal data, respects your privacy and is committed to complying with this Policy, which describes how we, as a travel management and related services company, collect and use the personal data that you, the company which you are an employee of or are otherwise traveling on behalf of ("Company"), or third parties provide to us.

What is the scope of this Policy?

This Policy describes what personal data we collect about you, how we collect it, how we use it, with whom we may share it, and what choices you have regarding our use of your personal data. We also describe the measures we take to protect the security of your personal data and how to contact us.

This Policy applies to IP TRAVEL's business managed travel and related services, as well as business travel consulting and leisure services that may be provided to you, including related services on IP TRAVEL website and applications that display or link to this Policy (hereinafter collectively, the "Services") www.IPtravel.be.

We encourage you to read this Policy carefully and in its entirety as it relates to your rights regarding the processing of your personal data. As a user of our Services, you understand and agree that we collect, use, store, and disclose your personal data in accordance with this Policy.

IP TRAVEL complies with applicable data protection laws in the jurisdictions in which it operates in its handling of personal data.

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IATA 082 10193 - E-mail: info@iptravel.be - FORTIS 210-0814801-53
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What personal data does IP TRAVEL collect?

In the course of providing its Services, IP TRAVEL may collect, use, store, and disclose personal data. Personal data is any information that can be used to identify you or that we can link to you. You, as traveler or user of the Services, may be asked to provide certain personal data when you use our Services, such as:

- Names and contact information (work and home/mobile phone, fax, email, address);
- Traveler arranger and emergency contact names and information;
- Traveler preferences and trip/meeting details (e.g. routings, class of service, seat preferences, frequent flyer data, meal preferences, hotel/rail/car and other ground transportation membership data and preferences, special accommodation requests, other personal data voluntarily supplied by you via your profiles, surveys, or other requests);
- Travel documentation (e.g. passport/visa/national id/driver's license number, TSA number, citizenship, date of birth, gender);
- Payment data (corporate/personal credit cards) and bank information;
- Company identifiers (department, division, cost center).

If you submit any personal data relating to other people in connection with the Services (e.g. if you make a reservation for another individual, or provide an emergency contact), you represent that you have the authority to do so and that you have informed them we will collect, use, store, and disclose such personal data in accordance with this Policy.

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How does IP TRAVEL collect personal data?

IP TRAVEL collects personal data:

- Directly from you when you access various parts of our Services, including when you communicate with us via email or other channels;
- From other sources, for instance, including your Company and your Company's third parties who may send us your personal data on your or your Company's behalf;

How does IP TRAVEL use personal data and on which legal bases?

IP TRAVEL collects and uses your personal data for specified, explicit, and legitimate purposes as described in this Policy and does not process your personal data further in a manner that is incompatible with those purposes.

IP TRAVEL uses personal data to:

A. Provide its Services and fulfill its obligations to your Company and travelers (e.g. complete and administer travel reservations, assist in managing the travel, provide travel based reporting and analytics, issue electronic and standard ticketing, process refunds, provide notices about your account and the Services, inform you of updates to our websites and applications, provide travel consulting services, including, but not limited to, business intelligence applied to the analysis of a Company's travel policy, sustainability engagement, and other changes to our products or Services).

B. Communicate with you via various multi-media channels (for instance, by email, post, phone, or IP TRAVEL's websites or applications) and to provide you with customer service.

C. Understand how our websites and applications are used and provide a customized experience as you use our Services, such as by providing interactive or personalized elements on our Services and providing you with

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content based on your interests (for more information, see the Section below titled "How does IP TRAVEL handle "do not track" requests and use "Cookies" and other similar technologies?").

D. Fulfill a request made by you or your Company (e.g. travel based reporting, travel consulting and/or sustainability based reporting, questions, booking requests, or other requests about your personal data). Automated decision-making may be used to process some requests to assist in delivering faster and more reliable Services to you and/or your Company (e.g. rerouting your request to the appropriate department, sending automatic replies). Important decisions will always be reviewed by an IP TRAVEL employee.

E. Conduct surveys (e.g. traveler, client satisfaction) and review the quality and performance of our services for customer satisfaction purposes.

F. Carry out our obligations and enforce your, our, or other's rights as we believe reasonably necessary (e.g. billing and collection, fraud prevention, comply with legal obligations, and respond to legal proceedings or requests from legal authorities and law enforcement or other third parties).

To process your personal data as described above, IP TRAVEL relies on the following legal bases. In view of purpose A, we process your personal data where necessary for the performance of the contract we have with your Company and/or you, which allows us to deliver our Services to you. In view of purpose B to F, we rely on our legitimate business interest to provide and improve our Services or on the legitimate interests pursued by your Company. For purpose G, IP TRAVEL relies where applicable on compliance with legal obligations. We rely on our legitimate business interest to prevent fraud and to protect our rights. When using personal data to serve IP TRAVEL's or a third party's legitimate interest, IP TRAVEL will always balance your rights and interests in the protection of your personal data against IP TRAVEL's rights and interests or those of the third party. We will obtain your consent for the use of your personal data where required by applicable laws.

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Who does IP TRAVEL disclose personal data to and why?

Personal data may be collected and shared with or disclosed as required for the provision of Services to:

- IP TRAVEL and its related companies, affiliates, subsidiaries, joint ventures, partners, subcontractors, and agents as necessary to fulfill and support the Services, including emergency bookings and assistance, ticket issuance, responding to requests, and assessing or offering promotions.
- Other companies IP TRAVEL uses to support its business who provide ancillary services (e.g. fulfillment, surveys, storage, statistical analysis, technology, development, credit checks (as applicable)).
- Your Company for travel based reporting, travel consulting, auditing, tracking and other purposes as necessary with your Company, including those of its personnel they request we send or make personal data available to.
- Third party service providers you or your Company request we send personal data to (e.g. providers who secure compensation for delayed, canceled, or overbooked flights on behalf of travelers; safety and tracking information providers; companies providing weather information, travel alerts, and destination content through solutions and tools; entities who collect travel information on behalf of airline carriers for the purpose of such entities forwarding it on to certain airlines for tracking of negotiated fares between airlines and your Company; successor organizations and other travel management companies).
- Third party service providers to complete travel arrangements and reservations and fulfill the Services (e.g. Global Distribution Systems (GDSs); airlines, trains, rental car and other ground transportation companies, hotels, cruise lines, destination management companies, and other related travel suppliers for booking/ticketing purposes; industry reporting authorities; equipment and technology vendors, including, without limitation, online booking tool providers, meeting registration software

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- providers (including onsite and mobile event management solution providers), and audio visual companies; visa and passport providers; credit card companies and payment collection and processing companies).
- Other third parties as we believe is reasonably necessary in accordance with applicable laws, including laws outside your country of residence to: (i) satisfy laws, regulations, or governmental or legal requests and processes; (ii) identify, contact, or bring legal action against someone who may be violating our terms of use or policies or otherwise enforce our terms and policies; (iii) operate the Services properly; or (iv) protect IP TRAVEL and those it serves, including pursuing available remedies or to limit damages that may be sustained (e.g. exchanging information with other companies and organizations for the purposes of fraud protection and risk reduction).

Data consolidation companies may also be used by IP TRAVEL or your Company for the purpose of creating reports and related statistics for benchmarking or other related purposes, including, without limitation, utilizing cumulative statistical data, which may incorporate data acquired from your Company for ordinary business purposes customary in our industry and the Services we provide, but without identifying, directly or indirectly, you or your Company.

How does IP TRAVEL store and protect personal data?

Typically, IP TRAVEL stores personal data on its servers managed internally (in Belgium).

IP TRAVEL uses appropriate technical and organizational security measures to protect the personal data IP TRAVEL holds on its network and systems from unauthorized access, disclosure, destruction, and alteration. We conduct periodic reviews of our data collection, storage, processing, and security measures to verify we are only collecting, storing, and processing personal

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data that is required for our Services and to fulfill our contractual obligations. While we make every effort to protect the integrity and security of our network and systems, we cannot guarantee, ensure, or warrant that our security measures will prevent illegal or unauthorized activity related to your personal data. When using our Services, you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect your personal data, we do not warrant the security of any data and information that you transmit to us over the Internet and you do so at your own risk.

In order to protect your personal data, we kindly ask you to not send us credit card information or other similar sensitive personal data, including special categories of personal data, to us via email. We also encourage you to keep your password confidential and not disclose it to any other person. If you are sharing a computer with anyone you should log out before leaving a website or service to protect access to your password and personal data from subsequent users.

Please alert us immediately if you believe your password or any of your personal data has been misused while using IP TRAVEL Services and applications. Please note, we will never ask you to disclose your password of your credit card in an unsolicited phone call or email.

How long does IP TRAVEL keep my personal data?

IP TRAVEL retains personal data for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by applicable law. When determining how long to retain personal data, we take into account the necessity of the personal data for the provision of our Services, applicable laws and regulations, including data protection laws, and our legal obligations. We may retain records to investigate or defend against potential legal claims. When retention of the personal data is no longer necessary, the data will be deleted or anonymized.

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What are my rights with respect to my personal data?

You may choose what personal data (if any) you wish to provide to us. However, if you choose not to provide certain details, your experience with some or all of our Services may be affected.

To the extent required by applicable law, you have the ability to exercise various rights with regard to your personal data (i.e. access, correction, erasure, restriction, objection, portability, etc.). IP TRAVEL will handle such requests in accordance with applicable law, including in the time specified by applicable law, and where permitted by applicable law, may charge a reasonable administrative fee to cover the costs of responding to any such request. Where processing is based on consent, you have the right to withdraw consent at any time if required by applicable law, without affecting the lawfulness of processing based on your consent before your withdrawal. In some jurisdictions, in addition to you agreeing to this Policy, data privacy or protection laws may require us to obtain a separate express consent for processing of your personal data. Your consent may also be implied in some circumstances, as permitted by applicable law, such as when communications are required to fulfill your requests.

How can I exercise my rights or make complaints?

If you wish to exercise any of your rights as described in this Policy, you (or, in accordance with applicable law, someone on your behalf), can submit your request by clicking [here](#).

If you have any questions about this Policy, you can contact IP TRAVEL's Data Protection Officer as follows:

- IP Travel – info@iptravel.be – att of Legal Department

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IP TRAVEL will respond to your request via the email address you use to exercise your request, the phone number that you have registered with us or we otherwise have on file for you, or any other suitable method. Depending on your request, we may review the request with you and/or your Company to assist in resolving and responding to the request.

We are committed to working with you to obtain a fair resolution of any complaint or concern you may have about our use of your personal data. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to make a complaint to the data protection authority in your country (if one exists in your country).

How are changes to this Policy handled?

IP TRAVEL reserves the right to revise, amend, or modify this Policy at any time and in any manner. When we post changes to this Policy, we will update the "last updated" date at the top of this Policy and we encourage you to regularly check this Policy for changes.

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