



Privacy Shield Policy

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CONFIDENTIAL INFORMATION

This document is the property of Atlas Travel and Technology Group (ATTG) and is applicable to all companies receiving management services by ATTG. Dissemination, distribution, copying or use of this document in whole or in part by anyone other than a Client of ATTG is strictly prohibited without prior written permission of ATTG.

Atlas Travel & Technology Group (“ATTG”) has adopted this Privacy Shield Policy (“Policy”) to establish and maintain an adequate level of Personal Data privacy protection. This Policy applies to the processing of Personal Data that ATTG obtains from Customers located in the European Union and Switzerland.

ATTG complies with the US-EU Privacy Shield Framework and Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Individual Customers in the European Union member countries and Switzerland. ATTG has certified that it adheres to the Privacy Shield Privacy 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 Privacy Principles, the Privacy Shield Privacy Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov>.

The Federal Trade Commission (FTC) has jurisdiction over ATTG's compliance with the Privacy Shield.

All ATTG employees who handle Personal Data from Europe and Switzerland are required to comply with the Principles stated in this Policy.

Capitalized terms are defined in Section 14 of this Policy.

I. SCOPE

This Policy applies to the processing of Individual Customer Personal Data that ATTG receives in the United States concerning Individual Customers who reside in the European Union and Switzerland. ATTG provides products and services to businesses and consumers.

This Policy does not cover data from which individual persons cannot be identified or situations in which pseudonyms are used. (The use of pseudonyms involves the replacement of names or other identifiers with substitutes so that identification of individual persons is not possible.)

II. RESPONSIBILITIES AND MANAGEMENT

ATTG has designated the Information Security (IS) Department to oversee its information security program, including its compliance with the EU and Swiss Privacy Shield program. The IS Department shall review and approve any material changes to this program as necessary. Any questions, concerns, or comments regarding this Policy also may be directed to privacyshield@atlasttg.com.

ATTG will maintain, monitor, test, and upgrade information security policies, practices, and systems to assist in protecting the Personal Data that it collects. ATTG personnel will receive training, as applicable, to effectively implement this Policy. Please refer to Section 7 for a discussion of the steps that ATTG has undertaken to protect Personal Data.

III. RENEWAL / VERIFICATION

ATTG will renew its US-EU Privacy Shield and Swiss-US Privacy Shield certifications annually, unless it subsequently determines that it no longer needs such certification or if it employs a different adequacy mechanism.

Prior to the re-certification, ATTG will conduct an in-house verification to ensure that its attestations and assertions about its treatment of Individual Customer Personal Data are accurate and that the company has appropriately implemented these practices. Specifically, as part of the verification process, ATTG will undertake the following:

- A. Review this Privacy Shield policy and its publicly posted website privacy policy to ensure that these policies accurately describe the practices regarding the collection of Individual Customer Personal Data
- B. Ensure that the publicly posted privacy policy informs Individual Customers of ATTG's participation in the US EU Privacy Shield and US Swiss Privacy Shield programs and where to obtain a copy of additional information (e.g., a copy of this Policy)
- C. Ensure that this Policy continues to comply with the Privacy Shield principles
- D. Confirm that Individual Customers are made aware of the process for addressing complaints and any independent dispute resolution process (ATTG may do so through its publicly posted website, Individual Customer contract, or both)
- E. Review its processes and procedures for training Employees about ATTG's participation in the Privacy Shield programs and the appropriate handling of Individual's Personal Data

ATTG will prepare an internal verification statement on an annual basis.

IV. COLLECTION AND USE OF PERSONAL DATA

ATTG provides various solutions to its Individual Customers who purchase its products. ATTG collects Personal Data from Individual Customers when they purchase its products, register with our website, log-in to their account, complete surveys, request information or otherwise communicate with us. For example, ATTG individual customers may choose to seek live support or post to a message board.

The Personal Data that we collect may vary based on the Individual Customer's interaction with our website and request for our services. As a general matter, ATTG collects the following types of Personal Data from its Individual Customers: contact information, including, a contact person's name, work email address, work mailing address, work telephone number, title, and company name, as well as payment information (which might include credit card and/or bank account information). Individual customers have the option to log into their accounts online and to request service online, including through a live support option; we will collect information that they choose to provide to us through these portals.

When Individual Customers use our services online, we will collect their IP address and browser type. We may associate IP address and browser type with a specific customer. We also may collect Personal Data from persons who contact us through our website to request additional information; in such a situation, we would collect contact information (as discussed above) and any other information that the person chooses to submit through our website.

The information that we collect from Individual Customers is used for selling the products and services they buy from us, managing transactions, reporting, invoicing, renewals, other operations related to providing services and products to the Individual Customer.

For certain products, ATTG serves as a service provider. In our capacity as a service provider, we will receive, store, and/or process Personal Data. In such cases, we are acting as a data processor and will process the personal information on behalf of and under the direction of our partners and/or agents. The information that we collect from our Individual Customers in this capacity is used for managing transactions, reporting, invoicing, renewals, other operations related to providing services to the Individual Customer, and as otherwise requested by our partner and/or agent.

ATTG uses Personal Data that it collects directly from its Individual Customers and for its partners indirectly in its role as a service provider for the following business purposes, without limitation:

1. maintaining and supporting its products, delivering and providing the requested products/services, and complying with its contractual obligations related thereto (including managing transactions, reporting, invoices, renewals, and other operations related to providing services to a Individual Customer);
2. satisfying governmental reporting, tax, and other requirements (e.g., import/export);
3. storing and processing data, including Personal Data, in computer databases and servers located in the United States;
4. verifying identity (e.g., for online access to accounts);
5. as requested by the Individual Customer;

6. for other business-related purposes permitted or required under applicable local law and regulation;
7. and as otherwise required by law.

ATTG does not disclose personal information to third parties for purposes that are materially different than what it was originally collected for. Should this change in the future, we will provide individuals with the option to opt-out.

V. DISCLOSURES / ONWARD TRANSFERS OF PERSONAL DATA

Except as otherwise provided herein, ATTG discloses Personal Data only to Third Parties who reasonably need to know such data only for the scope of the initial transaction and not for other purposes. Such recipients must agree to abide by confidentiality obligations.

ATTG may provide Personal Data to Third Parties that act as agents, consultants, and contractors to perform tasks on behalf of and under our instructions. For example, ATTG may store such Personal Data in the facilities operated by Third Parties. Such Third Parties must agree to use such Personal Data only for the purposes for which they have been engaged by ATTG and they must either:

1. comply with the Privacy Shield principles or another mechanism permitted by the applicable EU & Swiss data protection law(s) for transfers and processing of Personal Data;
2. or agree to provide adequate protections for the Personal Data that are no less protective than those set out in this Policy;

ATTG also may disclose Personal Data for other purposes or to other Third Parties when a Data Subject has consented to or requested such disclosure. Please be aware that ATTG may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements. ATTG is liable for appropriate onward transfers of personal data to third parties.

VI. SENSITIVE DATA

ATTG does not collect Sensitive Data from its Individual Customers.

VII. DATA INTEGRITY AND SECURITY

ATTG uses reasonable efforts to maintain the accuracy and integrity of Personal Data and to update it as appropriate. ATTG has implemented physical and technical safeguards to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. For example, electronically stored Personal Data is stored on a secure network with firewall protection, and access to ATTG's

electronic information systems requires user authentication via password or similar means. ATTG also employs access restrictions, limiting the scope of employees who have access to Individual Customer Personal Data.

Further, ATTG uses secure encryption technology to protect certain categories of personal data. Despite these precautions, no data security safeguards guarantee 100% security all of the time.

VIII. NOTIFICATION

ATTG notifies Individual Customers about its adherence to the EU-US Privacy Shield and Swiss-US Privacy Shield principles through its publicly posted website privacy policy, available at: <http://www.atlastravel.com/privacy-policy.php> and take Individual customers approval and adherence to the current policy when they provide their information to us in the transactional process.

IX. ACCESSING PERSONAL DATA

ATTG personnel may access and use Personal Data only if they are authorized to do so and only for the purpose for which they are authorized.

X. RIGHT TO ACCESS, CHANGE OR DELETE PERSONAL DATA

- A. Right to Access. Individual Customers have the right to know what Personal Data about them is included in the databases and to ensure that such Personal Data is accurate and relevant for the purposes for which ATTG collected it. Individual Customers may review their own Personal Data stored in the databases and correct, erase, or block any data that is incorrect, as permitted by applicable law and ATTG policies. Upon reasonable request and as required by the Privacy Shield principles, ATTG allows Individual Customers access to their Personal Data, in order to correct or amend such data where inaccurate. Individual Customers may edit their Personal Data by logging into their account profile or by contacting ATTG by phone or email. In making modifications to their Personal Data, Data Subjects must provide only truthful, complete, and accurate information. To request erasure of Personal Data, Individual Customers should submit a written request to local ATTG office.
- B. Requests for Personal Data. ATTG will track each of the following and will provide notice to the appropriate parties under law and contract when either of the following circumstances arise: (a) legally binding request for disclosure of the Personal Data by a law enforcement authority unless prohibited by law or regulation; or (b) requests received from the Data Subject. If ATTG receives a request for access to his/her Personal Data from an Individual Customer, then, unless otherwise

required under law or by contract with such Individual Customer, ATTG will refer such Data Subject to the Individual Customer.

- C. Satisfying Requests for Access, Modifications, and Corrections. ATTG will endeavor to respond in a timely manner to all reasonable written requests to view, modify, or inactivate Personal Data.

XI. CHANGES TO THIS POLICY

This Policy may be amended from time to time, consistent with the Privacy Shield Principles and applicable data protection and privacy laws and principles. We will make employees available of changes to this policy either by posting to our intranet, through email, or other means. We will notify Customers if we make changes that materially affect the way we handle Personal Data previously collected, and we will allow them to choose whether their Personal Data may be used in any materially different manner.

XII. QUESTIONS OR COMPLAINTS

EU and Swiss Individual customers may contact ATTG with questions or complaints concerning this Policy at the following address:

privacyshield@atlasttg.com

XIII. ENFORCEMENT AND DISPUTE RESOLUTION

In compliance with the US-EU and Swiss-US Privacy Shield Principles, ATTG commits to resolve complaints about your privacy and our collection or use of your personal information. EU and Swiss individuals with questions or concerns about the use of their Personal Data should contact us at: privacyshield@atlasttg.com.

If a Customer's question or concern cannot be satisfied through this process ATTG has further committed to refer unresolved privacy complaints under US-EU Privacy Shield and Swiss-US Privacy Shield to an independent dispute resolution mechanism operated by the International Centre for Dispute Resolution/American Arbitration Association (ICDR/AAA).

If you do not receive timely acknowledgement of your complaint, or if your complaint is not satisfactorily addressed by ATTG, EU and Swiss individuals may bring a complaint before the ICDR/AAA EU and Swiss Privacy Shield program (free of charge) and can be found at: <http://go.adr.org/privacyshield.html>. Finally, as a last resort and in limited situations, EU and Swiss individuals may seek redress from the Privacy Shield Panel, a binding arbitration mechanism. For more information on binding arbitration, see US Department of Commerce's Privacy Shield Framework: Annex I (Binding Arbitration), available at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

ATTG commits to cooperate with EU and Swiss data protection authorities (DPAs) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

XIV. DEFINED TERMS

Capitalized terms in this Privacy Policy have the following meanings:

"Individual Customer" means an Individual customer or client of ATTG from EU or Switzerland. The term also shall include any individual agent, representative, of an individual customer of ATTG and all employee of ATTG where ATTG has obtained his or her Personal Data from such Individual Customer as part of its business relationship with ATTG.

"Data Subject" means an identified or identifiable natural living person. An identifiable person is one who can be identified, directly or indirectly, by reference to a name, or to one or more factors unique to his or her personal physical, psychological, mental, economic, cultural or social characteristics. For Customers residing in Switzerland, a Data Subject also may include a legal entity.

"Employee" means an employee (whether temporary, permanent, part-time, or contract), former employee, independent contractor, or job applicant of ATTG or any of its affiliates or subsidiaries, who is also a resident of a country within the European Economic Area.

"Europe" or "European" refers to a country in the European Union.

"Personal Data" as defined under the European Union Directive 95/46/EC means data that personally identifies or may be used to personally identify a person, including an individual's name in combination with country of birth, marital status, emergency contact, salary information, terms of employment, job qualifications (such as educational degrees earned), address, phone number, e-mail address, user ID, password, and identification numbers. Personal Data does not include data that is de-identified, anonymous, or publicly available. For Switzerland, the term "person" includes both a natural person and a legal entity, regardless of the form of the legal entity.

"Sensitive Data" means Personal Data that discloses a Data Subject's medical or health condition, race or ethnicity, political, religious or philosophical affiliations or opinions, sexual orientation, or trade union membership.

"Third Party" means any individual or entity that is neither ATTG nor an ATTG employee, agent, contractor, or representative.