



Privacy Policy

Updated September 19, 2024

Internova Travel Group

Travel Leaders Group Holdings, LLC (d/b/a Internova Travel Group) (“Internova”) and its affiliates (“**Internova**,” “**we**,” “**us**,” “**our**” or the “**Company**”) make up a global travel services company that serves corporate and individual client travel needs through various travel related offerings and services (the “**Services**”). We created this privacy policy (“**Privacy Policy**”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy explains the conditions under which and the purposes for which (i) we collect and use your Personal Data (as defined in section 1, below) in connection with the provision of our Services and through your use of our Company websites (“**Site(s)**”) and (ii) we may share or disclose your Personal Data to third parties, as well the choices and means, if any, we offer you for limiting the use and disclosure of your Personal Data .

This Privacy Policy applies to our brands listed below.

Advisor Division

Luxury



GLOBAL TRAVEL
COLLECTION

IN THE KNOW
EXPERIENCES



TRAVEL GROUP

Agency Division

Consortium



Products



ROADTRIPS

The Ultimate in Sports Travel

Direct Division

Corporate

INTERNOVA
TRAVEL SOLUTIONS



Leisure



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This Privacy Policy does not apply to Personal Data collected by or provided in connection with an individual's application for employment, current or former employment, or independent contractor arrangements with Internova. If you are an Internova employee, independent contractor, or applicant for employment, please see the Internova Employee Privacy Notice(s) or Prospective Employee Privacy Notice(s) for information about how Internova collects, uses, processes, discloses, shares, and retains employment data not covered by this Privacy Policy.

The server(s) that make(s) this Site available may be located outside the country from which you accessed this Site, but we will collect and use Personal Data only in accordance with this Privacy Policy and as required by local law in the places in which we operate. Our European Union and UK Privacy Policy can be found in the [UK & European Union Privacy Policy](#) section of this Privacy Policy. Information about individual rights under U.S. Data Protection Laws can be found in the Notice of Privacy Rights to Residents of Certain U.S. States section of this Privacy Policy.

1. INFORMATION WE COLLECT

We collect information about you when you use our Site(s) or in providing our Services to you. **"Personal Data"** consists of any information that relates to you and/or information from which you can be identified, directly or indirectly. For example, information which identifies you may consist of your name, address, telephone number, photographs, location data, an online identifier (e.g., cookies identifiers and your IP address) or one or more factors specific to your physical, physiological, economic, cultural, or social identity. The laws of some countries have different definitions of personal data or equivalent terms and, in this Privacy Policy, we give this the same meaning as under the data protection laws that apply to our processing of your personal data.

We do not consider Personal Data to include information that has been de-identified so that it does not allow information to be linked to a specific individual or that does not allow a specific individual to be singled out. We may collect non-Personal Data related to your interaction with or use of the Services and/or Sites.

We may collect different types of Personal Data: **"Technical Information"** and **"Personal Information."**



Privacy Policy.

"Personal Information" typically consists of your:

- full legal name,
- email address,
- mailing address,
- telephone number and
- credit card number or other payment information.

We may also collect other Personal Information in order to assist you with your travel plans, including but not limited to:

- passport number,
- driver's license or other government-issued identification number,
- date of birth,
- gender,
- arrival and departure locations and times,
- airline, hotel or car rental frequent loyalty numbers,
- known traveler and global entry number, and
- other related travel information.

Sensitive Data. We may collect or process data that is deemed "Sensitive Data" under certain laws. We may process the following categories of Sensitive Data when you use our Services:

- Information about your location when you use certain of our Services, particularly certain apps. Such apps collect location data to display the real-time risk alerts and personalized assistance notification features, even when the app is closed and not in use. The types of location data we collect depend in part on your device and account settings. You can change this later by going to the device settings.
- Payment information including debit or credit card information in combination with any required security or access code collected for purpose of processing payment for our products or Services.
- Authentication data such as account Personal Data and log in credentials, including unique identifiers such as username, account number, and password.
- Passport number, driver's license, or other government-issued identification number.
- Immigration and citizenship information.
- Health related information.

When required by applicable law, Internova will collect consent prior to processing certain categories of Sensitive Data.



- IP address,
- search terms, and
- site pages you visit while on our Site, whenever you visit our Site, use our services, or view our online advertisements.

You can learn more about how we use cookie data by reviewing our [Cookie Policy](#) [which can be found in section 10 of this Privacy Policy].

We and/or certain service providers operating on our behalf may collect Information about your activity, or activity on devices associated with you over time, on our sites and applications, and across non-affiliated websites or online applications. We may collect this Information by using certain technologies, such as cookies, web beacons, pixels, software developer kits, third party libraries, and other similar technologies. Third-party service providers, advertisers, and/or partners may also view, edit, or set their own cookies or place web beacons. We collect Technical Information when you use our Site, or information that has been made anonymous, such as:

- **Log data:** Our servers automatically record information when you use our Site, such as your IP address, the type of browser you are using and its settings, the third party website you visited immediately prior to accessing our Site, the operating system you are using, the domain name of your Internet service provider, the search terms you use on our Site, the specific Site pages you visit, type of product selected, the brand, order, and product identifications, and the duration of your visits.
- **Cookie data:** A “cookie” is data that a website server stores on your computer. Cookies enable websites to recognize your computer and to “remember” your entries as you move from page to page, or even when you revisit the site from time to time using the same computer.
- **Web Beacons.** Website pages may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related statistics (for example, recording the popularity of certain content and verifying system and server integrity). We also use these technical methods to analyze the traffic patterns, such as the frequency with which our users visit various parts of the Services. These technical methods may involve the transmission of Information either directly to us or to a third party authorized by us to collect Information on our behalf. Our Services use retargeting pixels from Google, Facebook, and other ad networks. We also use web beacons in HTML emails that we send to determine whether the recipients have opened those emails and/or clicked on links in those emails.
- **Analytics.** Analytics are tools we may use, such as Google Analytics to help us gather and analyze information about the areas visited on the Site (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the convenience of the websites. For more information or to opt-out, see [“How Google uses](#)

TECHNOLOGIES

account. This could be in the form of an advertisement on the Google search results page or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to our sites. Any data we collect will be used in accordance with this Privacy Policy, and Google is responsible to abide by its own privacy policy. You can set your preferences for how Google advertises to you using the Google Ad Preferences page:

<https://adssettings.google.com/>

- **Microsoft Clarity.** We improve our products and advertising by using Microsoft Clarity to see how you use our website. By using our site, you agree that we and Microsoft can collect and use this data. You can find their privacy policy here: <https://www.microsoft.com/en-US/privacy/privacystatement>
- **Meta, Pinterest, TikTok, Twitter Pixel.** We use Meta, Pinterest, TikTok, Twitter Pixel Tags to better measure, optimize, and retarget our marketing campaigns. This allows user specific behavior to be tracked after they have been redirected to the advertiser's website by clicking on a social media ad. This enables us to measure the effectiveness of social media ad for statistical and market research purposes. The data collected in this way is anonymous to us, in other words, we do not see the personal information of individual users. This data is stored and processed by the social media entity (i.e., Meta). The social media entity may link this information to your social media account and also use it for its own promotional purposes, for example, in accordance with Meta's Data Usage Policy <https://www.facebook.com/about/privacy/>. For more information on opt-out options, please visit: <https://www.facebook.com/help/568137493302217>
- **Mobile Application Technologies.** If you access our website and Services through a mobile device, we may automatically collect Information about your device, your phone number, and your physical location.

We may also collect information pertinent to the marketing of our products and services. This information may include marketing channels, User Market IDs (CenterPoint, TNMP, etc.), Site brands and product names, contract terms, financial information and other information.

We collect and analyze this Technical Information to measure the number of visitors to the different sections of our Site, to evaluate how visitors use our Site and to provide you with advertisements that are relevant and useful to you, unless you have told us not to. We also use the information we collect to understand customer needs and trends, to carry out targeted promotional activities, and to generally help us make our Site more useful to visitors.

We may use your Site data by itself or aggregate it with similar information we have obtained from others. We may share your Site data with our affiliates and other third parties to achieve these objectives (see section 5 for further information). You may obtain a list of our affiliates and third parties with whom we share your Site data by contacting us [here](#).



C) INFORMATION WE MAY RECEIVE FROM THIRD PARTIES

We may collect additional Information about you from third party websites, social media platforms, and/or sources providing publicly available Information (e.g., from the U.S. postal service) to help us provide Services to you, help prevent fraud, and for marketing and advertising purposes.

This Privacy Policy only applies to Information collected by our Services. We are not responsible for the privacy and security practices of those other websites or Social Media Platforms or the Information they may collect (which may include IP address). You should contact such third parties directly to determine their respective privacy policies. Links to any other websites or content do not constitute or imply an endorsement or recommendation by us of the linked website, Social Media Platform, and/or content.

2. HOW WE USE YOUR PERSONAL DATA

We collect and use your Personal Data for a variety of reasons, including to personalize Services to you. If you are a customer, an agent, the Personal Data we hold, and use is necessary for the performance of the services or other agreement to which you are a party or to perform the services you have otherwise requested.

If you are a prospective customer, the Personal Data we collect and use is necessary for our legitimate interest in providing you with information about the services we offer, and about which you have expressed an interest or that we believe will be of benefit to you. Where appropriate, we will obtain your consent at the time we communicate with you.

In some cases, our purpose for collecting the information is because you have expressly consented to our collection and use of your Personal Data.

You may provide the information to us directly, or through a tool or product provided by us or another company to your employer (in the case of our business clients). We collect your Personal Data, such as name, address, email address, phone number, and credit card information in order to provide the services you have requested. Other examples of Personal Data that we collect include:

- From customers, we or our service provider will collect contact and identification information, such as name, address, telephone number, e-mail address, date and place of birth;
- From travel customers, we may also request information such as your passport and known traveler information, vendor loyalty programs, and other information as deemed necessary by the



We use the Personal Data we have collected to allow us to provide the products and services you have chosen, process payments, or to manage and develop our business and operations, including:

- Establishing, managing and terminating business relations with you;
- Reviewing the products and services that we provide to you;
- Informing you of our products and services other than those that you have specifically requested;
- Informing you of products and services carefully selected third parties may wish to offer you;
- Responding to your comments or requests for information;
- Investigating and preventing fraudulent activities, unauthorized access to the services and other illegal activities;
- Protecting us against error, fraud, theft, and damage to our goods and property;
- Enabling us to comply with applicable law or regulatory requirements;
- For any other purposes about which we notify customers and users; and
- For any other reasonable business purpose to which you consent.

If you send us an email with questions or comments, we may use your email address to respond to your questions or comments, and we may save your questions or comments for future reference.

We may email you when:

- You request information about or from us;
- It relates to purchases you have made from us (e.g., product updates, customer support, etc.);
- You consented to being contacted by email for a particular purpose;
- We are sending you information about our other products and services, offers, promotions and our newsletters, if this is in accordance with your marketing preferences. However, you will always be able to opt-out of such communications at any time (See the **“Your Choices About the Use of Your Personal Data ”** section [below](#)).

3. PREFERENCE-BASED ADVERTISING, ANALYTICS AND SERVICES

For purposes of this Privacy Policy, “sell,” “sold,” or “sale” means the disclosure of Personal Data for monetary or other valuable consideration but does not include, for example, the transfer of Personal Data as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of our business, whereas “sharing” means disclosing or making available Personal Data to a third party for purposes of cross-context behavioral advertising. While we do not disclose Personal Data to third parties in exchange for monetary compensation, we may disclose Personal Data such as identifiers and Internet and network activity Information, to third party advertising networks and analytics providers for purposes of marketing and advertising and to improve and measure our ad campaigns.



third parties to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our products and services, and better understand your online activity. For more information on how this type of advertising works, go to [here](#). Our use of online tracking technologies may be considered a “sale” or “sharing” under certain laws. To the extent that disclosing data to these online tracking technologies is deemed to be a “sale” or “sharing” under certain laws, you can opt out of these online tracking technologies by submitting a request via <https://admin.axeptio.eu/> or by broadcasting an opt-out preference signal, such as the Global Privacy Control (GPC). Please note that some features of our website may not be available to you as a result of these choices.

We do not sell or share sensitive Personal Information, nor do we sell or share Personal Information about individuals we know are under the age of sixteen (16).

4. USE AND DISCLOSURE OF SENSITIVE INFORMATION

We do not collect, use, or disclose Sensitive Information beyond the permitted business purposes under applicable law. Accordingly we only use or disclose Sensitive Information as reasonably necessary: (a) to perform services or provide the goods requested by or reasonably expected by you; (b) to prevent, detect, or investigate security incidents that compromise stored or transferred Information; (c) to detect, prevent, and respond to malicious, deceptive, fraudulent, or illegal actions directed at the Company and to prosecute those responsible for actions; (d) to ensure physical safety of natural persons; (e) for short-term transient use, such as non-personalized advertising shown as part of an individual’s current interactions with the Company; (f) to perform Services; (g) to maintain the quality of Services; and (h) to process Information where the goal is not to draw inferences of characteristics about you.

5. COLLECTION AND USE OF PERSONAL DATA BY THIRD PARTIES

As explained in more detail in this section, we may share your Personal Data with various third parties, and certain third parties may collect Personal Data on our behalf. This includes:

- our business partners to make an initial determination of the services you may desire, or to otherwise facilitate our business operations;
- as necessary, with airlines, hotels and other providers for whose services you have requested our assistance;
- Internova group companies in line with the data uses set out in this Privacy Policy;



A) Third Party Providers

We may use third parties to assist in fulfilling your service requests or providing other important information to you. We also use third parties to support our internal business functions. We require all such service providers to act in compliance with their contractual obligations to protect your Personal Data. We may also share your Personal Data with third parties, including our affiliates, or with employees, agents, consultants and other parties who require the information to assist us to establish, maintain and manage our business relationship with you. Further, we may share your Personal Data with our partners and affiliates to promote other services to you that you might like or to show you ads in which you might be interested, subject to applicable data protection and electronic marketing laws. For a full list of third party providers we may share Personal Data with please refer to the subprocessors list found on <https://trust.internova.com>.

B) Email Communications

Subject to applicable electronic marketing and data protection laws, may share your email contact information with our partners to assist with marketing our products and services. You may unsubscribe at any time from receiving future commercial email communications from us by clicking the "unsubscribe" link included at the bottom of any marketing emails we send, or by contacting us [here](#). However, we will continue to send you transactional emails such as customer service communications in connection with the products or services you have purchased. For security reasons, we do not recommend that you send Personal Data, such as passwords, social security numbers, or bank account information, to us by email.

C) Corporate Transactions

We do not sell or lease Personal Data or provide a list of our customers to third parties. However, as we continue to develop our business, we may sell or purchase assets, restructure our business or obtain investment or be subject to other relevant corporate transactions. If another entity acquires us or all (or substantially all) of our assets, the information we have about you will be transferred to and used by this acquiring entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties. We may also transfer information about you in the context of a prospective corporate transaction.

D) Legal Necessity

Depending on the jurisdiction in which you reside, we may reserve the right in some circumstances to disclose any information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a)



In the event of our insolvency we, or any appointed insolvency practitioner, may disclose your Personal Data to the CAA, and/or ABTA so that they can assess the status of your booking and advise you on the appropriate course of action under any scheme of financial protection.

- [The CAA's General Privacy Notice](#)
- [The ABTA's Privacy Notice](#)

6. YOUR CHOICES ABOUT THE USE OF YOUR PERSONAL DATA

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. You may have additional rights if you reside in the United Kingdom or in the European Union. Please refer to our [Cookie Policy](#) here.
- **Your Contact Information.** If you have previously emailed us and would like us to delete your contact information from our files, please contact us [here](#).
- **Other Information.** If at any point you believe the Personal Data we hold about you is incorrect, you want us to correct or delete that information, or you no longer want us to hold that information or contact you, you can [Contact us](#).

You have additional rights concerning your Personal Data if you reside in the United Kingdom or in the European Union. These can be found in the "[UK & European Union Privacy Notice](#)" section of this Privacy Policy.

A) Accuracy Of Personal Data

It is important that the Personal Information we hold about you is accurate and current. We require you to keep us informed of changes to your Personal Information. If your registration information changes, please contact us [here](#). We take reasonable steps to verify your identity prior to honoring any such requests to help protect your privacy and security.

B) Accessing Your Personal Data

If you want to know what Personal Data we hold about you or wish to change Personal Data that is inaccurate or out of date, or to withdraw your consent to our use of your Personal Data, please contact us [here](#). It may not always be possible to completely remove or modify information in our databases,



Certain browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for preference-based advertising purposes (“DNT Notice”). Some browsers are, by default, set to provide a DNT Notice, whether or not that reflects your preference. Providing DNT Notice is often touted as a means to ensure that cookies, web beacons and similar technology are not used for preference-based advertising purposes – that is, to restrict the collection of information your online activities for advertising purposes. Unfortunately, given how preference-based advertising works, DNT Notices may not effectively accomplish this goal. For this and a variety of other reasons, with respect to our Site, we do not take any particular action based on browser based DNT Notices. However, we do not use third-party advertisers or engage in behavioral marketing data collection for resale.

If you are located in the US, you may have additional rights. Please refer to the Notice of Privacy Rights for Residents of Certain US States section of this Privacy Policy and our [Cookie Policy](#).

If you are located in the United Kingdom or the European Union, you may have additional rights. Please refer to the [UK & European Union Privacy Policy](#) section of this Privacy Policy and our [Cookie Policy](#).

If you are located in Canada, you may have additional rights. Please refer to the Canadian Notice section of this Privacy Policy and our [Cookie Policy](#).

7. NOTICE OF PRIVACY RIGHTS FOR RESIDENTS OF CERTAIN U.S. STATES

Residents of certain U.S. states may have rights and choices regarding their Personal Data. To the extent any data protection law applies to our collection of your data, this supplemental section of our Privacy Policy outlines the individual rights you may be entitled to and how to exercise those rights.

A) Rights Under Applicable Data Protection Laws

Depending on where you live and subject to certain exceptions, you may have some or all of the following rights.

- **Right to Know and Access.** You may have the right to request that we confirm whether we process your Personal Data, and to request information about our collection and use of your data, including whether we sell or share your Personal Data. You also have the right to request access to Personal Data we may process about you.

RIGHTS

- **Right to request correction of inaccurate Data.** TO the extent that we may maintain inaccurate Personal Data, you may have the right to request that we correct such inaccurate data, taking into account the nature of the Personal Data and the purposes of the processing of the Personal Data.
- **Right to Request Deletion:** You may have the right to request that we delete certain Personal Data or records provided by or obtained about you, with certain exceptions and limitations as allowed under law.
- **Right to Opt-Out of the use of Personal Data for Targeted Advertising and Profiling:** You may have the right to opt out of the processing of your Personal Data for purposes of targeted advertising or profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **Right to Limit Use and Disclosure of Sensitive Personal Data.** You may have the right to request that we limit the ways we use and disclose your sensitive Personal Data to uses which are necessary for us to perform the Services, or deliver the goods reasonably expected by you, or and as authorized by law. As noted elsewhere we do not use or disclose your Information other than for the permitted business purposes outlined above.
- **Right to Non-Discrimination:** You may have a right to not be discriminated against in the Services or quality of Services you receive from us for exercising your rights. We will not discriminate against you for exercising any of your rights in this section including denying goods or Services, charging different prices or rates for goods or Services, or providing a different level of quality of goods and Services. However, we may offer a different price, rate, level, quality, or selection of goods or Services, including offering goods or Services for no fee, if you have exercised your right to opt out or the offer is related to your voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program.
- **Right to Disclosure of Direct Marketers.** You may have a right to know the categories and names/addresses of third parties that have received Personal Data for their direct marketing purposes upon simple request, and free of charge.
- **Right to Appeal.** You may have the right to appeal our denial of any request you make under this section. To exercise your right to appeal, please submit an appeal request via the information in the [How to Contact Us](#) section below or using the [Your Privacy Choices](#) page. Within the certain timeframe of receipt of your appeal, as proscribed by the applicable law we will inform you in writing of any action taken or not taken in response to your appeal, including a written explanation of the reasons for the decisions. If we deny your appeal, you may contact the Attorney General or another authority which we will help you identify.

To learn more about whether you are guaranteed certain rights, or to submit a request to exercise your rights, please contact us using any of the methods in the Contact Us section.

or (2) proof of power of attorney pursuant under applicable law. We may deny a request from an authorized agent that does not submit proper verification proof.

C) Exercising Your Data Subject Rights

To exercise any of the rights described above, please submit a verifiable request to us via the methods described below. The verifiable request must:

- Provide sufficient Information that allows us to reasonably verify you are the person about whom we collected Information, or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

To help protect your privacy and maintain security, if you request access to or deletion of your Information, we will take steps and may require you to provide certain Information to verify your identity before granting you access to your Information or complying with your request. In addition, if you ask us to provide you with specific pieces of Information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose Information is the subject of the request. Only you or your authorized agent may make a verifiable request related to your Information. If you designate an authorized agent to make a request on your behalf, we may require you to provide the authorized agent written permission to do so and to verify your own identity directly with us (as described above). You may also make a verifiable consumer request on behalf of your minor child.

You may contact us using our [online form](#).

D) Changes To This Privacy Policy

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will notify you through a notice on our Site.

E) Contact Information

If you have any questions or comments about this Privacy Notice, the ways in which we collect and use your Personal Information, your choices and rights regarding such use, or wish to exercise your rights under applicable data protection law, please do not hesitate to contact us at:

Internova Travel Group

Attn: Privacy Office

1633 Broadway, 35th Floor

New York, NY 10019

United States

<https://dsar.internova.com>



about your physical, physiological, mental, economic, cultural, or social identity (“**Personal Data**”).

This notice describes our practices in connection with Personal Data that we collect from you through the website(s) and / or Services that link to this notice and applies to our processing of Personal Data of UK and EU residents that is covered by the EU General Data Protection Regulation (“**GDPR**”) and the UK General Data Protection Regulation (“**UK GDPR**”) and is a supplement to our Privacy Policy.

A) Who is the controller of your Personal Data

- Internova Travel Group, LLC, a company incorporated and registered in the State of Delaware whose registered office is at 1633 Broadway, 35th Floor, New York, NY 10019;
- And the Affiliates and their addresses listed on <https://internova.com/contact/>.

If you have any questions about which of the above companies is the controller of your Personal Data or their exact controller relationship, please contact us using the following contact details privacy@internova.com.

B) What information does Internova collect and how is this information used?

We collect Personal Data from the sources listed in Section 1 of this Privacy Policy. This includes collecting Personal Data directly from you or automatically from you or your device when you interact with our Sites or Services, from business partners, your employer or travel sponsor, and other sources as detailed in [Section 1 of this Privacy Policy](#).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- Identity data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, gender, employer name, passport number, driver’s license or other government-issued identification number etc.
- Contact data includes billing address, delivery address, email address and telephone numbers.
- Financial data includes bank account and payment card details.
- Travel information includes arrival and departure locations and times, airline, hotel or car rental frequent loyalty numbers, known traveler and global entry number travel preferences, travel dates etc.
- Transaction data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

on to carry out such processing.

Purpose of processing activity	Lawful basis for processing
<p>Use of Services: To allow you to use our Services and Sites, including enabling you to create accounts, collecting your payments, and providing you with customer support.</p>	<ul style="list-style-type: none"> • Necessary for the performance of our contract with you, or to take steps prior to entering into a contract with you.
<p>Communication: To communicate with you about our Services, your orders, and our relationship with you, including providing you with information on your request and updating you about changes to our terms.</p>	<ul style="list-style-type: none"> • Necessary for the performance of our contract with you, or to take steps prior to entering into a contract with you. • Your consent*. • Necessary for our legitimate interests in ensuring that our commercial interests are reasonably protected contractually and to reflect changes in our business.
<p>Business administration: To ensure proper administration of our business, including by keeping appropriate records, processing complaints, managing our business relationships, and in the context of a business reorganisation.</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests in ensuring the functioning and continuity of our Services and business operations. • Necessary to comply with an applicable legal obligation.
<p>Risk alerts and personalized assistance: To display real-time risk alerts and personalized assistance notification features when you use certain of our Services (such as 3rd party Duty of Care tools that customers sign up to).</p>	<ul style="list-style-type: none"> • Your consent*, collected when you engage with our Services.
<p>Security: To ensure the security and ongoing functioning of our Services and Sites, including through troubleshooting, activity monitoring, and system maintenance.</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests in ensuring the security and ongoing functioning of our Services.
<p>Marketing: To send you marketing communications about our Services and business, if this is in accordance with your</p>	<ul style="list-style-type: none"> • Your consent*, collected when you engage with our Services or Sites. • Where permitted by applicable data protection laws, we may rely on our legitimate interests

<p>Advertising: To deliver relevant website content and advertisements to you and to understand the effectiveness of the advertising we serve to you by using tracking technologies.</p>	<p>consent mechanisms.</p> <ul style="list-style-type: none"> • Where permitted by applicable data protection laws, we may rely on our legitimate interests instead of your consent (where our legitimate interests are to pursue business development initiatives and keep you informed of relevant offers). Please see our Cookie Policy for further information.
<p>Analytics: To understand your online activities to improve our Services, offerings and the user experience by using tracking technologies.</p>	<ul style="list-style-type: none"> • Your consent*, collected through our cookie consent mechanisms. • Where permitted by applicable data protection laws, we may rely on our legitimate interests instead of your consent (where our legitimate interests are to improve our Services, offerings and the user experience). Please see our Cookie Policy for further information.
<p>Wrongdoing: To allow us to detect, prevent, investigate and prosecute illegal activity, suspected fraud or other wrongdoing.</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests in detecting, preventing, investigating and prosecuting illegal activity, suspected fraud or other wrongdoing. • Necessary to comply with an applicable legal obligation.
<p>Legal claims: To allow us to establish, exercise or defend legal claims in potential or actual legal proceedings.</p>	<ul style="list-style-type: none"> • Necessary for our legitimate interests in pursuing legal claims. • Necessary for compliance with applicable legal obligations.
<p>Exercise rights: To allow us to exercise or perform any right or obligation which is conferred or imposed on us by applicable law.</p>	<ul style="list-style-type: none"> • Necessary to comply with an applicable legal obligation.
<p>Legal obligations: To allow us to comply with any applicable legal obligation, including obligations to retain your data for a certain period of time.</p>	<ul style="list-style-type: none"> • Necessary to comply with an applicable legal obligation.



it was originally collected, or as otherwise required by applicable legal obligations. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. If we continue to retain your personal data in accordance with a legal obligation, any further processing of your data will be limited to compliance with such legal obligation.

To determine the appropriate retention period for Personal Data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal obligations.

D) Your Rights as a Data Subject

You have important rights that you may exercise to protect your Personal Data. You may access those rights at any time by contacting us [here](#).

Individuals located in UK and the EEA, have certain rights regarding their Personal Data, as set out in more detail below. Some of these rights, e.g., the right to be forgotten or the right to request that we transfer your information to another company, will only apply in certain circumstances. Most rights are also subject to certain exceptions and exemptions that may mean that we are not always legally required to comply with your request in part or in full.

You have the following rights concerning your personal data that we hold and process that you can exercise at any time:

Rights	What does this mean?
The right to be informed	You have the right to be provided with clear, transparent, and easily understandable information about how we use your Personal data and your rights. Therefore, we are providing you with the information in this notice.
The right of access	You have the right to obtain access to your Personal Data (if we are processing it), and certain other supplementary information (like the information provided in this notice). This is so you are aware and can check that we are using your Personal Data in accordance with data protection law.
The right to rectification	You are entitled to have your Personal Data corrected if it is inaccurate or incomplete.

THE RIGHTS

<p>The right to restrict processing</p>	<p>You have rights to block or suppress further use of your Personal Data. When processing is restricted, we can still store your Personal Data, but may not use it further. We keep lists of people who have asked for further use of their Personal Data to be 'blocked' to make sure the restriction is respected in future.</p>
<p>The right to data portability</p>	<p>You have the right to receive your Personal Data in a structured, commonly used and machine-readable format and to request that this data is transmitted to another controller where this is technically feasible. This right only applies to Personal Data you have provided to us yourself (not any other information), that we process by automated means based on your consent or for the performance of a contract with you.</p>
<p>The right to object</p>	<p>You have the right to object to the use of your Personal Data where are processing your Personal Data to pursue our or a third party's legitimate interests for direct marketing or other purposes set out in this Privacy Policy. Where you object, we must stop using your Personal Data for direct marketing purposes. For objections related to processing for other purposes, we will need to stop using your Personal Data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or we need to use the Personal Data to establish, exercise or defend legal claims.</p>
<p>The right not to be subject to a decision based solely on automated processing, including profiling</p>	<p>You have the right not to have your Personal Data used to make solely automated decisions about you that have legal or similarly significant effects on you. For example, you have the right not to have your Personal Data used to create a profile of you that automated decisions are later based on without there being any human involvement in that processing.</p>
<p>The right to withdraw consent at any time</p>	<p>If you have given your consent to anything we do with your Personal Data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your Personal Data with your consent up to that point is unlawful) as per the "Consent" section below. This includes the right to withdraw consent to us using your Personal Data for marketing purposes.</p>



and procedures to minimize the risk of unauthorized access or disclosure.

E) Consent

For certain types of Personal Data, we have asked for your consent to use the data for certain described purposes at the time you provided it. You may withdraw your consent at any time. When you give us your consent, you are giving us permission to process your personal data specifically for the purpose identified in the consent request. Where we ask you for additional personal data, we will obtain your consent to our proposed use of that data where required, and always tell you why and how the information will be used.

You may withdraw consent at any time by contacting us [here](#).

F) Sharing with Third Parties

See Section 4 of our Privacy Policy for details regarding how we share your Personal Data with third parties.. For a complete and up-to-date list of the third parties we are currently using and sharing Personal Data with, please contact us [here](#).

Any third parties that we may share your data with are obliged to keep your details secure, and to use them only for the purposes and to complete the tasks identified by Internova. When they no longer need your data to fulfill this service, they will dispose of the details in line with Internova 's procedures.

G) International Transfer of Personal Data

We may transfer your personal data outside the United Kingdom and European Economic Area, including to other companies in the Internova group, third-party service providers and partners, and we put adequate safeguards in place when we do so. This includes only transferring personal data to countries that have been deemed to provide an adequate level of protection for personal data, or by otherwise using an appropriate safeguard to ensure the ongoing protection of personal data, such as standard contractual clauses approved by the applicable regulatory authority. You may request further information on the safeguards we use by contacting us [here](#).

H) Data Subject Rights and Complaints

If you wish to make a data subject request or raise a complaint on how we handle your Personal Data, you can contact us at <https://dsar.internova.com>

ICO

If you have a query or complaint about how your personal data is being used by Internova that we have been unable to resolve, you can also contact the Information Commissioners Office, the supervisory authority that regulates personal data in the UK, by writing to them at Wycliffe House, Water Lane,



9. CANADIAN NOTICE

This Privacy Notice applies to the processing of Personal Information under applicable Canadian privacy laws and is a supplement to our Privacy Policy.

A) Access and correction

Subject to applicable law, you have the right to access, update and correct inaccuracies in your Personal Information in our custody and control. You may request access, updating and corrections of inaccuracies in your Personal Information in our custody or control by emailing or writing to us at the contact information set out at the bottom of this Privacy Policy.

B) Safeguards and retention

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the Personal Information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. We restrict access to Personal Information on a need-to-know basis to employees and authorized service providers who require access to fulfil their job requirements. We have record retention processes designed to retain Personal Information for no longer than necessary for the purposes set out herein or as otherwise required to meet legal or business requirements.

C) Service providers

Your Personal Information will be transferred (or otherwise made available) to certain third parties that provide services on our behalf. We use service providers to provide services such as collecting travel and other information, hosting the Site, analyzing data, and delivering customer feedback surveys. Our service providers are only provided with the information they need to perform their designated functions and are not authorized to use or disclose Personal Information for their own marketing or other purposes. Our service providers are located in Canada, the U.S. and other foreign jurisdictions.

1. For Quebec Residents

As some of our service providers are located outside of Quebec, your Personal Data may be transferred outside of Quebec.

D) Legal and compliance



the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

E) Third party links

Our Site(s) may contain links to other websites that Internova does not own or operate. We provide links to third party websites (e.g., such as the websites of business partners and other organizations we work with) as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat Personal Information. We encourage you to read the privacy policy of every website you visit.

F) Contact

If you have any questions or comments about this Privacy Policy or the manner in which we or our service providers treat your personal information, or to request access to our collection of your personal information, please contact us using the contact information located at the bottom of this Privacy Policy.

10. COOKIE POLICY

To make this Site work properly, we sometimes place small data files called cookies on your device.

A) What are cookies?

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

B) How do we use cookies?

We use cookies for the following purposes:

- To assist you in navigation of our Sites;
- To help you provide feedback to us;
- To analyze your use of our products, Services or applications.

We use the following cookies and classify cookies in the following categories:



- Session cookies;
- Targeting cookies.

You can opt-out of each cookie category (except strictly necessary cookies).

C) Cookie Privacy Setting

When you visit any web site, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalized web experience. Because we respect your right to privacy, you can choose not to allow some types of cookies. However, blocking some types of cookies may impact your experience of the Site and the Services we are able to offer.

D) Types of Cookies

- **Strictly Necessary Cookies:** These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the Site will then not work. These cookies do not store any personally identifiable information.
- **Advertising Cookies:** Advertising cookies are placed on your computer by advertisers and ad servers in order to display advertisements that are most likely to be of interest to you. These cookies allow advertisers and ad servers to gather information about your visits to the Site and other websites, alternate the ads sent to a specific computer, and track how often an ad has been viewed and by whom. These cookies are linked to a computer and do not gather any Personal Information about you.
- **Analytics Cookies:** Analytics cookies monitor how users reached the Site, and how they interact with and move around once on the Site. These cookies let us know what features on the Site are working the best and what features on the Site can be improved.
- **Personalization Cookies:** Personalization cookies are used to recognize repeat visitors to the Site. We use these cookies to record your browsing history, the pages you have visited, and your settings and preferences each time you visit the Site.
- **Security Cookies:** Security cookies help identify and prevent security risks. We use these cookies to authenticate users and protect user data from unauthorized parties.
- **Site Management Cookies:** Site management cookies are used to maintain your identity or session on the Site so that you are not logged off unexpectedly, and any information you enter is retained from page to page. These cookies cannot be turned off individually, but you can disable all cookies in your browser.
- **Third-Party Cookies:** Third-party cookies may be placed on your computer when you visit the Site by companies that run certain Services we offer. These cookies allow the third parties to gather

COOKIES

cookies we will not know when you have visited our site and will not be able to monitor its performance. For example, a number of our pages use cookies to remember (i) your display preferences, such as contrast color settings or font size; (ii) if you have already replied to a survey pop-up that asks you if the content was helpful or not (so you won't be asked again); or (iii) if you have agreed (or not) to our use of cookies on this Site. Some videos embedded in our pages use a cookie to anonymously gather statistics on how you got there and what videos you visited.

Enabling these cookies is not strictly necessary for the Site to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features of this Site may not work as intended. The cookie-related information is not used to identify you personally and the pattern data is fully under our control. These cookies are not used for any purpose other than those described here.

E) How to control cookies

You can control and/or delete cookies as you wish – for details, click [here](#). You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

11. SAFEGUARDING YOUR PERSONAL INFORMATION

We strive to safeguard Personal Information using methods that are appropriate to the sensitivity of the information. We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the Personal Information under our control. However, we cannot guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your Personal Information. From time to time, we evaluate new technology for protecting information, and when appropriate, we upgrade our information security systems.

12. DATA RETENTION

We will retain your Information for as long as needed to provide you Services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. We will retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our



13. GEOGRAPHIC LOCATION OF DATA STORAGE AND PROCESSING

Our Services are targeted to individuals located inside and outside the United States, and we maintain significant operations in the United States. As such, the Services collect Personal Data and process and store that data in databases located in the United States. If you are visiting the Services from a country outside the United States, you should be aware that you may transfer Personal Data about yourself to the United States, and that the data protection laws of the United States may not be as comprehensive as those in your own country.

14. CHILDREN

Our Site is not directed to children. Our Services do not target children nor do we sell products or services for purchase directly by children. We will not knowingly collect Personal Information from children without explicit parental or guardian consent, in line with applicable legal requirements. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed Personal Data to us, please contact us [here](#). A parent or guardian of a child under the age of 13 may review and request deletion of such child's Personal Data as well as prohibit the use of that information.

If you are based in the UK or the EU, the age threshold for obtaining parental consent varies between 13 and 16 years, depending on the age established in each country. Please contact us [here](#) if you are a parent or a guardian of a child in the UK or the EU and you believe he or she has disclosed Personal Data to us. A parent or guardian may review and request deletion of a child's Personal Data as well as prohibit the use of that information.

15. THIRD PARTY LINKED SITES

Our Services may contain links to other websites or services that are not owned or controlled by us, including links to Social Media Platforms such as Facebook, Instagram, or YouTube, or may redirect you off our website away from our Services. This Privacy Policy does not apply to your use of unaffiliated websites to which our Site is linked. Company is not responsible for the privacy practices or the content on linked sites. We recommend that you carefully read the privacy policies of each site you visit.



17. DIFFICULTY ACCESSING OUR PRIVACY POLICY

Individuals with disabilities who are unable to usefully access our Privacy Policy online may contact us to inquire how they can obtain a copy of our policy in another, more easily readable format.

18. CHANGES TO PRIVACY POLICY

We may from time to time make changes to this Privacy Policy to reflect changes in legal or regulatory obligations or changes in the manner in which we deal with Personal Data . We will post any revised version of this Privacy Policy on our Site. Any changes will be effective on the effective date stated in the revised Privacy Policy. If there are significant changes, we may provide more prominent notice or obtain your consent as required by law. If you do not wish to accept the changes, you should cease using the Site. Your continued use of the Site after we have posted a revised Privacy Policy indicates your agreement to the revisions.

19. CONTACT US

To get more information about our privacy and information security practices, or if you (a) have questions or comments about our Privacy Policy; (b) wish to make corrections to any Personal Information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to withdraw your consent to sharing your Personal Information with others, contact us as follows:

Email us:

privacy@internova.com

Write us:

Attn: Privacy Office
1633 Broadway, 35th Floor
New York, NY 10019
United States



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