

# Privacy Policy – Website & Mobile App

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Travel Password SAS 13 Casa Pittichi Tozza 20111 Calcatoggio, France

Please read our Privacy Policy carefully as it explains the following:

- What personal information we collect from you and for which purpose (Section 3 and 4)
- The measures to safeguard the access to and the security of your Personal Data (Section 5)
- Your rights to access, rectify, erase your Personal Data and object to the processing of your Personal Data (Section 8).

**In order to use the Products, you must first acknowledge and agree to our Privacy Policy. You cannot use the Products without first accepting our Privacy Policy.**

## 1. General

Travel Password SAS provides the TravelPassword, a set of tools and applications for people who travel. The Travel Password consists of the Travel Password Mobile Application (defined hereinafter and collectively the "Application"). The Mobile Application interacts with the user to capture and display data in Application.

The Results (as defined hereinafter) are not transferred to any type of external services. Data are kept only inside the mobile application.

Travel Password SAS ("TravelPassword ", "we", "us") recognizes and understands the importance of the privacy of its users ("users", "You") and wants to respect their desire to store and access personal information in a private and secure manner. This Privacy Policy applies to our Application and our Website (collectively the "Products") and describes how Travel Password SAS manages, stores and utilizes your Personal Data through its Products.

In order to use our Products, we require you to consent to the collection and processing of your Personal Data before you start using the Products. If you do not agree with the terms of this Privacy Policy, you may not use in any manner the Products.

Travel Password SAS is committed to protecting the privacy of all of its users Personal Data and providing a secure, user-controlled environment for the use of the Products in accordance with the Privacy Act of 8 December 1992 and . At the same time, you also share responsibility for maintaining privacy and security for example, by not allowing any third party to use your personal account on the Travel Password Mobile Application. Travel Password SAS asks all users to be responsible for safeguarding any authentication information and to immediately notify Travel Password SAS of any unauthorized use of your personal Account.

Please read this Privacy Policy carefully (which is also available on our Website: [www.travelpassword.eu](http://www.travelpassword.eu)) so that you fully understand how we obtain and process your Personal Data. By accepting this Privacy Policy, you acknowledge and agree that you were adequately informed of the functioning and objectives of the Application.

## 2. Definitions

- "Account" means your account registered through the registration process on the Travel Password SAS Mobile Application
- "Application" means the (i) Travel Password SAS Mobile Application and (iii)
- "Travel Password SAS Mobile Application" means the mobile application (i) which the user has to download on its mobile device and (ii) is intended to record, display, store and transmit your travel data
- Depending on the user profile different application functions can be made available
- "Products" means the Application
- "Results" means the raw data and the results of the analysis stored by user inside Application
- "Insights" means the data collected via the application
- "Third Parties" means any natural or legal person or entity other than Travel Password SAS
- "Website" means the website available at [www.travelpassword.eu](http://www.travelpassword.eu)

## 3. Information we collect

We may collect several types of personal information from the users of our Products, and store it on your mobile device such as:

- Contact information (e.g. your name, postal address, e-mail address, and mobile or other telephone number)
- The profile data provided by you on your account such as your name and profile picture
- Travelers demographics such as date of birth and gender
- Information about your device, such as its model, unique device identifier and operating system version
- Information collected by manual input by the Application
- Web behavior information such as information related to how the users use the Products (e.g. browser type, domains, page views) collected through cookies and other automated technology (cfr. Section 6 "Cookies").

Hereinafter collectively "Personal Data".

We do not store your Personal Data on our servers.

## 4. How do we use your Personal Data

Travel Password SAS (i) collects, (ii) uses, (iii) maintains your Personal Data provided by you for all purposes necessary to ensure the proper functioning and operation of the User accounts and/or the proper functioning of the Products. These purposes may include (collectively the "Purpose"):

- Creating and managing your Account to use the Application;
- Providing information and allowing the Users access to the Products;
- Diagnosing technical problems and managing technical support and processing inquiries concerning the Products;
- Contacting the Users by phone, email, text message or push notifications (if they are enabled) to

(i) verify your account (ii) for information and operational purposes such as account

management, instructions, alerts, reminders, customer service, system maintenance and others

- Commercializing the Application;
- Protecting against, identify and prevent fraud and other unlawful activity, claims and other liabilities;
- Complying with and enforcing any applicable legal obligations with respect to our Terms of Use and Privacy Policy.

Furthermore, you agree that Travel Password SAS is free to access, retain, and disclose Personal Data in the following events:

- In order to be in compliance with any applicable legislation or regulations;
- If a law enforcement authority or other government official requests so;
- To enforce the Travel Password SAS Terms of Use or Privacy Policy
- The investigation of any suspected or actual fraudulent or illegal activity and
- To protect your or our safety and/or rights.

By using the Application, you acknowledge and explicitly agree that we may disclose certain information to vendors and service providers who help us provide the Products. Examples of these vendors and service providers include entities that process credit or debit card payments and provide analytics and web hosting services.

By using the Application, you acknowledge and explicitly agree that we may disclose certain information to providers that build profiles to improve the diagnostic capabilities of the Application. We will not share your information without your permission.

You furthermore understand and agree that the technical processing and transmission of the Products, including your Personal Data, may involve (i) transmissions over various networks; and (ii) modifications to conform and adapt to technical requirements of connecting networks.

## **5. Security**

Travel Password SAS shall take appropriate administrative, technical and organizational measures against unauthorized or unlawful processing of any Personal Data or its accidental loss, destruction or damage, access, disclosure or use.

In the event of and following discovery or notification of a breach of the security of the Personal Data, or access by an unauthorized person, Travel Password SAS is required by law to notify the user if the breach is likely to affect your privacy.

## **6. Cookies**

When using the Products, we may collect certain information by automated means, such as cookies (small text files stored in your browser) and similar technologies, including mobile application identifiers, to improve your experience of the Products, increase security, measure use and effectiveness of the Products, identify and resolve issues and marketing purposes. We may also use cookies and other automated means for purposes such as management our Products and other aspects of the commercialization of our business.

The information we collect in this manner includes IP address, browser characteristics, device characteristics, operating system version, information on actions taken on our Products (such as usage, activity logs an click-throughs), and dates and times of visits. Log data is deleted on a regular basis.

You can control cookies through your browser settings and other tools. Your device may offer you control over the use of cookies or other technologies when you use the Products. For example, you may be able to set your device or browser to disable, clear, reset or block the use of cookies or similar technologies. Please note, however, that without cookies the Products may not work properly or you may not be able to use all of their features.

**By continuing to use our Products, you consent to the placement of cookies and other automated means in your browser and device in accordance with this Privacy Policy.**

## **7. Disclosure to Third Parties**

We do not authorize Third Party service providers to use or disclose your Personal Data except as strictly necessary to perform any services under our supervision or to comply with applicable legislation. We seek to provide any such Third Party service provider with only the Personal Data they need to perform their specific function.

In any event, such Third Party service providers shall be obliged to treat your Personal Data in accordance with this Privacy Policy. However Travel Password SAS cannot be held liable for any damages, whether direct or indirect, that may result from the misuse of your Personal Data by such Third Party service providers.

## **8. Your rights**

**Right of access** If you are concerned or have any questions about your Personal Data, you have the right to request access to the Personal Data which we hold or process about you. We will then provide you with information about the data that are being processed and on the source of those data.

**Right of rectification and right of erasure** You have the right to request us free of charge to correct, erase or block any inaccuracies in your Personal Data if such Personal Data would be incomplete, inaccurate or processed unlawfully.

**Right to not be subject to automatated individual decision making** You have the right to request us not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

**Right to object to data processing** Without prejudice to the termination provisions of the Terms of Use, you may withdraw at any time your consent to the processing of your Personal Data by Travel Password SAS by permanently removing the Application and notifying us in writing thereof via [office@travelpassword.eu](mailto:office@travelpassword.eu). Upon receipt of this notification, Trgi shall promptly stop any processing of your Personal Data. You may also ask us to stop using your Personal Data for direct marketing purposes.

To exercise your abovementioned rights or any other questions concerning this Privacy Policy, please contact us by e-mail or in writing on the address below. You should add a copy of your identity card or other proof of your identity to your request. Travel Password SAS will undertake the necessary action without undue delay and provide information on action taken (or the absence of any such action) within 30 days.

You may also lodge a complaint with a supervisory authority in case of breach of the applicable privacy laws by Travel Password SAS.

## **9. Data retention and deletion**

We may retain information regarding you and your use of the Products, including Personal Data, for as long as reasonably needed to provide you with the Products and the uses described in this Privacy Policy.

Please note that we retain your Personal Data even if you temporarily stop using the Application until you permanently delete the Application on your mobile device and notify us thereof. Upon notification, we may retain and continue to use and disclosure your Personal Data to Third Parties exclusively on a fully anonymized basis for 1 year maximum.

## **10. Third Party websites or applications**

You acknowledge and agree that certain content or services provided by Third Parties may be made available to you through the Products. You agree that such linked content or services may have their own privacy policies for which Travel Password SAS cannot be held responsible. Travel Password SAS does not in any way review or endorse the privacy practices of such Third Parties.

## **11. Updates or changes to our Privacy Policy**

Occasionally, we may change or update this Privacy Policy to allow us to use or share your previously collected Personal Data for other purposes. If Travel Password SAS would use your Personal Data in a manner materially different from that stated at the time of the collection, we will provide you with a notice on our Website and in our Travel Password SAS Mobile Application indicating that the Privacy Policy has been changed or updated and request you to agree with the updated or changed Privacy Policy.

### **Controller**

TravelPassword

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