

# Privacy Policy

TripCenter Privacy Policy was updated on May 21, 2018 and complies with European Union Data Protection Law.

We value your privacy at TripCenter. So we've developed a Privacy Policy that covers how we collect, use, disclose, transfer, and store your information. Please take a moment to familiarize yourself with our privacy practices and [let us know](#) if you have any questions.

## Collection and Use of Personal Information

Personal information is data that can be used to identify or contact a single person or a group of people.

You may be asked to provide your personal information anytime you are in contact with TripCenter or a TripCenter affiliated company. TripCenter and its affiliates may share this personal information with each other and use it consistent with this privacy policy. They may also combine it with other information to provide and improve our products, services, content, and advertising. You are not required to provide the personal information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have.

Here are some examples of the types of personal information TripCenter may collect and how we may use it:

## What Personal Information We Collect

- When you create a TripCenter ID, make a booking, purchase a service, download a software update, register for a workshop or webinar with TripCenter, contact us or participate in an online survey, we may collect a variety of information, including your name, mailing address, phone number, email address, contact preferences, and credit card information.
- When you share your content with other associates using TripCenter platform and tools, or invite others to participate in TripCenter services or forums or workshop and webinars, TripCenter may collect the information you provide about those people such as name, mailing address, email address, and phone number. TripCenter will use such information to fulfil your requests, provide the relevant product or service, or for anti-fraud purposes.
- In certain jurisdictions, we may ask for a government issued ID in limited circumstances including when setting up an account and activating your account, for the purpose of extending commercial credit, managing reservations, or as required by law.

## How We Use Your Personal Information

- The personal information we collect allows us to keep you posted on TripCenter's latest product announcements, software updates, and upcoming events.
- We also use personal information to help us create, develop, operate, deliver, and improve our products, services, content and advertising, and for loss prevention and anti-fraud purposes.
- We may use your personal information, including date of birth, to verify identity, assist with identification of users, and to determine appropriate services. For example, we may use date of birth to determine the age of TripCenter account holders.
- From time to time, we may use your personal information to send important notices, such as communications about purchases and changes to our terms, conditions, and policies. Because this information is important to your interaction with TripCenter, you may not opt out of receiving these communications.
- We may also use personal information for internal purposes such as auditing, data analysis, and research to improve TripCenter's products, services, and customer communications.
- If you enter into promotion or contest, we may use the information you provide to administer those programs.

## Collection and Use of Non-Personal Information

We also collect data in a form that does not, on its own, permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal information for any purpose. The following are some examples of non-personal information that we collect and how we may use it:

- We may collect information such as occupation, language, zip code, area code, unique device identifier, referrer URL, location, and the time zone where TripCenter service is used so that we can better understand user behaviour and improve our products, services, and advertising.
- We may collect information regarding customer activities on our website, our app and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest. Aggregated data is considered non-personal information for the purposes of this Privacy Policy.
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our

services. Except in limited instances to ensure quality of our services over the Internet, such information will not be associated with your IP address.

If we do combine non-personal information with personal information the combined information will be treated as personal information for as long as it remains combined.

## Cookies and Other Technologies

TripCenter's websites including online services, apps, interactive maps, email messages, and advertisements may use "[cookies](#)" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behaviour, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

Ads that are delivered on TripCenter platform may appear in TripCenter app, affiliated and remarketing campaigns. If you do not wish to receive ads targeted to your interests on TripCenter platform, you can choose to enable Limit Ad Tracking, which shall opt your TripCenter ID out of receiving such ads. If you enable Limit Ad Tracking on your mobile device, third-party apps cannot use the Advertising Identifier, a non-personal device identifier, to serve you targeted ads. You may still see ads or News based on context like your search query or the channel you are reading. In third-party apps, you may see ads based on other information.

TripCenter and our partners also use cookies and other technologies to remember personal information when you use our website, online services, and applications. Our goal in these cases is to make your experience with TripCenter more convenient and personal. For example, knowing your first name lets us welcome you the next time you visit the TripCenter website or the application. Knowing your country and language helps us provide a customized and more useful shopping experience. Knowing someone using your computer or device has shopped for a certain product or used a particular service helps us make our advertising and email communications more relevant to your interests. And knowing your contact information, hardware identifiers, and information about your computer or device helps us to personalize your experience, and provide you with better customer service.

If you want to disable cookies, visit your browser preferences and then to the privacy pane to manage your preferences. On your mobile device, go to Settings, then find your way to the Privacy & Security section, and tap on "Block Cookies" to manage your preferences. If you are uncertain, check with your provider to find out how to disable cookies. Please note that many features of TripCenter website will not be available once cookies are disabled.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data.

We use this information to understand and analyse trends, to administer the site, to learn about user behaviour on the site, to improve our product and services, and to gather demographic information about our user base as a whole. TripCenter may use this information in our marketing and advertising services.

In some of our email messages, we use a “click-through URL” linked to content on TripCenter website. When customers click one of these URLs, they pass through a separate web server before arriving at the destination page on our website. We track this click-through data to help us determine interest in particular topics and measure the effectiveness of our customer communications. If you prefer not to be tracked in this way, you should not click text or graphic links in the email messages.

Pixel tags enable us to send email messages in a format customers can read, and they tell us whether mail has been opened. We may use this information to reduce or eliminate messages sent to customers.

## **Disclosure to Third Parties**

At times TripCenter may make certain personal information available to strategic partners that work with TripCenter to provide products and services, or that help TripCenter market to customers. For example, when you book a service, you authorize TripCenter to exchange the information you provide during the booking process to carry out service. If you are approved for using TripCenter platform, your account will be governed by TripCenter and its strategic partners privacy policies. Personal information will only be shared by TripCenter to provide or improve our products, services and advertising; it will not be shared with third parties for their marketing purposes.

## **Service Providers**

TripCenter shares personal information with companies or individuals who provide services such as information processing, extending credit, fulfilling customer orders, delivering products and services to you, managing and enhancing customer data, providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys. These companies are obligated to protect your information and may be located wherever TripCenter operates.

## **Others**

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for TripCenter to disclose your personal information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all personal information we collect to the relevant third party.

## **Protection of Personal Information**

TripCenter takes the security of your personal information very seriously. TripCenter online services protect your personal information during transit using encryption such as Transport Layer Security (TLS). When your personal data is stored by TripCenter, we use computer systems with limited access housed in facilities using physical security measures. Data is stored in encrypted form including when we utilize third-party storage.

When you use some TripCenter products, services, applications, or post a review of a service you booked, or on a TripCenter forum, chat room, or social networking service, the personal information and content you share is visible to other users and can be read, collected, or used by them. You are responsible for the personal information you choose to share or submit in these instances. For example, if you list your name and email address in a forum posting, that information is public. Please take care when using these features.

If you or anyone else uses TripCenter platform on to a device that is owned by a third party, any information shared within your account including bookings, account management, and purchases — may be downloaded on to that third-party device thereby disclosing any such shared information.

## **Integrity and Retention of Personal Information**

TripCenter makes it easy for you to keep your personal information accurate, complete, and up to date. We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

## **Access to Personal Information**

You can help ensure that your contact information and preferences are accurate, complete, and up to date by logging in to your account at <https://www.tripcenter.net/>. For other personal information we hold, we will provide you with access for any purpose including to request that we correct the data if it is inaccurate or delete the data if TripCenter is not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Access, correction, or deletion requests can be made through the [Privacy Contact Form](#).

## **Location-Based Services**

To provide location-based services on TripCenter platform, TripCenter and our partners and licensees may collect, use, and share precise location data, including the real-time geographic location of your computer or device. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you and is used by TripCenter and our partners and licensees to provide and improve location-based products and services. For example, your device may share its geographic location with application providers when you opt in to their location services.

## **Third-Party Sites and Services**

TripCenter websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services use or offer products or services from third parties.

Information collected by third parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

## **Our Companywide Commitment to Your Privacy**

To make sure your personal information is secure, we communicate our privacy and security guidelines to TripCenter employees and strictly enforce privacy safeguards with the company.

## **Privacy Questions**

If you have any questions or concerns about TripCenter's Privacy Policy or data processing or if you would like to make a complaint about a possible breach of local privacy laws, [please contact us](#) . You can always contact us by phone.

All such communications are examined and replies issues where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator in your jurisdiction. If you ask us, we will endeavour to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

TripCenter may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated privacy policy or by other means, such as email. Your continued use of the Services after such notice constitutes your consent to the changes. We encourage you to periodically review our Privacy Policy for the latest information.

## Your Data Controller

TripCenter.NET Ltd, 3rd Floor, Middlesex House, 130 College Road, Harrow-on-the-Hill, London, HA1 1BQ, UK.

The answers to frequently asked questions concerning GDPR may be found at <https://ico.org.uk/for-organisations/business/guide-to-the-general-data-protection-regulation-gdpr-faqs/>