

**HAPPYTRAVELDOTCOM Travel and Tourism LLC**  
**ONLINE BOOKING PLATFORM PRIVACY NOTICE**

HappyTravelDotCom Travel and Tourism LLC (“**Happy Travel**”, “**our**”, “**us**” or “**we**”) is committed to protecting the privacy of your personal data.

Throughout this privacy notice, the terms “**you**” and “**your**” refer to (i) employees and representatives of travel companies (such as travel agents, tour operators and other wholesalers or airlines providing ground services to customers; each a “**Travel Business**”) that wish to purchase one or more travel components (such as accommodation, transfers, sightseeing tours, excursions or meals out; together “**Travel Components**”), and (ii) end users of Travel Components (whose personal data may be provided to us indirectly, as further described below).

This notice describes how HappyTravel “processes” (e.g., collects, stores, uses, transmits) and protects your personal data that we collect and receive through our online booking platform. This notice also explains your various legal rights in connection with our processing of your personal data.

## **1. WHO WE ARE**

HappyTravel is responsible for processing your personal data in connection with our online booking platform and is the “data controller” of the processing described in this notice.

Please contact us if you have any questions about the contents of this privacy notice, including requests to exercise your legal rights.

## **2. PERSONAL DATA WE COLLECT**

Personal data is information relating to an individual, from which that person can be identified.

We may process different types of your personal data, such as:

- **Identity Data** includes name, title, marital status, date of birth, gender, telephone number, email address, location, postal address, information contained in government-issued identification documents such as passports, national ID cards and driver licenses (including nationality, identification numbers, social security numbers and your photograph).
- **Financial Data** includes bank account and credit card details.
- **Transaction Data** includes details about Travel Components or other products and services purchased.
- **Usage Data** includes information about how you use our website, such as internet protocol (IP) address, mouse tracking, links clicked, 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, your interests, preferences, and feedback responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing information from us and our partners.

We may also process **Aggregated** or **Anonymised Data** (i.e., data that can no longer be used to identify you), for any purpose.

**Special Categories of Personal Data** include information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, sexual orientation, genetic data, biometric data and data concerning health.

In certain limited circumstances, we may process Special Categories of Personal Data (for example, a religious meal preference). We will process such Special Categories of Personal Data only as permitted under applicable laws and regulations and where we have a basis for doing so. For instance, it may be possible for us to process Special Categories of Personal Data where it is necessary for the establishment, exercise or defense of legal claims, or for reasons of substantial public interest. We may also seek consent to process Special Categories of Personal Data, in which case we will provide you with further information about our data processing activities, as necessary.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you, including:

- a. **Direct interactions.** You may give us your Identity, Financial, Transaction, Profile and Marketing and Communications Data directly, including when you:
  - Enquire about or purchase one or more Travel Components.
  - Create an account on our online platform.
  - Provide feedback.
  - Subscribe to updates, marketing and promotional information.
  - Correspond with us, whether by post, phone or electronic mail (including email).
- b. **Indirect interactions.** We may receive your personal data indirectly, including from:
  - Travel Businesses.
  - Travel Component providers.
  - Credit reference agencies and payment service providers.
  - Professional advisers, such as legal, regulatory, tax and information technology advisers.
  - Marketing and advertising partners.
  - Market research providers.
  - Customer support service providers.
  - Fraud detection agencies.
  - Cookies or similar technologies, in the event that such are utilised on our online booking platform.

### 4. HOW WE USE YOUR PERSONAL DATA

#### Purposes of Processing

We process your personal data for one or more of the purposes listed below (or in ways that are not incompatible with the purposes listed below).

- a. To **provide our services**, including to:
  - Communicate with Travel Businesses and providers of Travel Components to enquire about and complete your reservation.
  - Administer your purchase/reservation of Travel Components.
  - Send confirmation, modification and reminder communications to you and to Travel Businesses and providers of Travel Components.
  - Process payments.

- b. To **communicate with you**, including to:
- Remind you to continue and confirm your reservation (where a reservation has not been finalised).
  - Handle and respond to your enquiries and requests.
  - Solicit and receive feedback and reviews about your experience.
  - Send security alerts or travel updates.
  - Invite you to interact with our online platform forum.
  - Request your participation in market research initiatives.
- c. For **business administration** purposes, including to:
- Create your user profile.
  - Authenticate and verify your identity.
  - Record your enquiries and requests, and our responses.
  - Conduct financial worthiness assessments.
  - Operate our online platform and its profiles.
  - Maintain our Travel Business and Travel Component provider contact database.
  - Manage our relationship with Travel Businesses and/or providers of Travel Components.
  - Undertake business planning, strategy and/or organisation (including to evaluate, enter into agreements for and complete corporate transactions such as partnerships, joint ventures, mergers, disposals, acquisitions or reorganisations of corporations or businesses, whether actual or contemplated).
- d. To **improve and secure our online platform**, including to:
- Test and troubleshoot the features of our online platform.
  - Enhance the functionality, security and quality of our online platform.
  - Complete statistical and trend analysis.
  - Undertake system management.
- e. For **legal** purposes, including to:
- Pursue, defend, handle and resolve legal disputes.
  - Assist with regulatory investigations.
  - Comply with lawful requests from law enforcement agencies.
  - Detect and prevent fraud, crime, money laundering and other illegal or unwanted activity.
  - Adhere to audit and reporting requirements.

### **Basis for Processing**

Processing for purpose (a) is undertaken because it is necessary for the performance of a contract. Personal data may be processed for purposes (b), (c) and (d) on the basis of our legitimate interests to provide, promote and improve our services. Your personal data may be processed for purpose (e) on the basis that it may be necessary for compliance with a legal obligation, for performance of a task

carried out in the public interest and for our legitimate interests in defending HappyTravel's business interest and complying with all legal and regulatory requirements to which we are subject.

When processing personal data to serve our legitimate interests, we always balance your interests and fundamental rights and freedoms to ensure they are never overridden.

Generally, we do not rely on consent as a legal basis for processing your personal data. In limited circumstances, we ask for your consent for specific activities, for example, sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent at any time by contacting us using the information in the Contact Details section below.

### **Marketing**

We will only send you marketing information where we can do so lawfully. We may send you marketing communications where you have requested information from us or previously purchased Travel Components through our online platform, and have not opted out of receiving such marketing material. We may also be able to send you marketing information where you have consented to receiving such material. You can choose not to receive marketing communications at any time.

### **Failure to Provide Personal Data**

Where we need to collect personal data by law, under the terms of a contract we have or are trying to enter with a Travel Business or provider of Travel Components, or otherwise in connection with our services, your failure to provide that personal data when requested may mean we are unable to provide our services to you.

## **5. DISCLOSURES OF YOUR PERSONAL DATA**

We may share your personal data (for the purposes listed above) with the following categories of third parties:

- a. Travel Businesses and Providers of Travel Components.
- b. Professional advisors such as legal, regulatory, tax and information technology advisers.
- c. Affiliates of HappyTravel.
- d. Third party service providers / business partners (who provide us with support services including customer support, marketing and advertising, market research, fraud detection, payment and credit reference services and IT support).
- e. Law enforcement agencies, regulatory or tax authorities and other governmental or public agencies.
- f. Counterparties in the context of corporate transactions, including actual or potential acquirers of, or investors in, our business.

## **6. LOCATION / INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA**

HappyTravel's business is located in Dubai. In order to provide our services, we use external service providers (including for web hosting), whose servers are located in jurisdictions outside Dubai (including within the European Union). When you provide personal data to us, it may be electronically routed through servers in such other jurisdictions and subsequently access by us in Dubai. We access your personal data in compliance with applicable data protection laws. Please contact us for further information.

## 7. DATA SECURITY

We have put in place appropriate technical and organisational security measures to prevent accidental or intentional manipulation, partial or complete loss or destruction of, or unauthorized access to personal data by third parties.

We limit access to your personal data to the employees, agents, contractors and other third parties who have a business need.

We have implemented procedures to deal with any suspected personal data breach. We will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. DATA RETENTION

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. 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 connection with which the personal data would be relevant.

In order 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 any applicable legal, regulatory, tax, accounting or other requirements.

We may anonymise or aggregate your personal data in such a way that it can no longer be associated with you. Where such data is no longer your personal data, we may retain it for a longer period of time.

In some circumstances you have the right to request that your personal data is deleted (further information is set out below).

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you may have the following rights under data protection laws in relation to your personal data:

- **Access** – the right to request confirmation of whether we process personal data relating to you and, if so, to request a copy of that personal data.
- **Correction** – the right to request that we rectify or update your personal data that is inaccurate, incomplete or outdated.
- **Erase** – the right to request that we erase your personal data in certain circumstances, such as where we collected personal data on the basis of your consent and you withdraw your consent.
- **Restriction of processing** – the right to request that we restrict the use of your personal data in certain circumstances, such as while we consider another request that you have submitted, for example, a request that we update your personal data.
- **Withdraw consent** – where our processing of your personal data is based on your consent, the right to withdraw your consent; however withdrawal of consent (i) does not invalidate the consent-based processing that occurred prior to such withdrawal, or processing that is not based on consent, and (ii) means that we will no longer be able to perform such consent-based processing activities, which may result in us being unable to provide certain services to you.

- **Portability** – the right to request a copy of your personal data that we process in a structured, commonly used and machine readable format and to have that data transmitted to an alternative data controller.
- **Objection to processing** – the right to object to certain data processing, such as for direct marketing purposes or where we rely on legitimate interests to which you object based on your particular circumstances.

If you wish to exercise any of these rights, please contact us using the information provided in the Contact Details section below. We try to respond to all legitimate requests within one month. It can take us longer than a month to respond if your request is particularly complex or if you make a number of requests. In this case, we will notify you and keep you updated.

## **10. CONTACT DETAILS AND IMPORTANT INFORMATION**

### **Contact Information**

HappyTravelDotCom Travel and Tourism LLC  
B106, Saraya Avenue Building  
Garhoud, Deira  
P.O. Box 36366  
Dubai, United Arab Emirates

Email: [info@happytravel.com](mailto:info@happytravel.com)

Telephone: +971-4-2999080

You can also contact us if you have a complaint in connection with our processing of your personal data. We would like the opportunity to address your concerns in the first instance, however, you may also have a right to complain at any time to your relevant data protection supervisory authority.

### **Changes to the Privacy Notice / Your Personal Data**

We regularly review our privacy notice. The most recent update was in [February 2020]. Please check from time to time for any updates to this notice.

To ensure the personal data we hold about you is accurate and current, please inform us if your personal data changes during your relationship with us.

### **Third Party Links**

Our website may include links to third-party websites, plug-ins and applications. HappyTravel does not control such third party websites and is not responsible for their privacy notices. Clicking on these links or allowing these connections may enable third-parties to collect or share your data. When you leave our website, we encourage you to read the privacy notice of each website you visit.