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Privacy Policy

Thank you for choosing to be part of our community at getyourtrip Inc. ("Company," "we," "us," or "our"). We are committed to protecting your personal information and your right to privacy. This Privacy Policy describes how we collect, use, process and share personal information. It applies to visitors and users (individually, “you” of getyourtrip's websites(our "Services")).

1. WHAT INFORMATION DO WE COLLECT?

We collect personal information that you voluntarily provide to us when you register on the express an interest in obtaining information about us or our products and Services, when you participate in activities on the or otherwise when you contact us. The personal information that we collect depends on the context of your interactions with us and the , the choices you make and the products and features you use. The personal information we collect may include the following:

- Personal Information Provided by You. We collect names; phone numbers; email addresses; mailing addresses; usernames; passwords; debit/credit card numbers; billing addresses; and other similar information.
- Payment Data. We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by Paypal. You may find their privacy notice link(s) here: [PayPal Personal Data](#)
- All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

2. HOW DO WE USE YOUR INFORMATION?

We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- To facilitate account creation and logon process.If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- To post testimonials.If you choose to link your account with us to a third-party account (such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and logon process for the performance of the contract.
- Request feedback.We may use your information to request feedback and to contact you about your use of our Service .
- To enable user-to-user communications.We may use your information in order to enable user-to-user communications with each user's consent.
- To send administrative information to you.We may use your information for the purposes of managing our account and keeping it in working order.
- To protect our Services.We may use your information as part of our efforts to keep our safe and secure (for example, for fraud monitoring and prevention).
- To enforce our terms, conditions and policies for business purposes, to comply with legal and regulatory requirements or in connection with our contract.
- To respond to legal requests and prevent harm.If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.

- Fulfill and manage your orders. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the .
- Administer prize draws and competitions. We may use your information to administer prize draws and competitions when you elect to participate in our competitions.
- To deliver and facilitate delivery of services to the user. We may use your information to provide you with the requested service.
- To respond to user inquiries/offer support to users. We may use your information to respond to your inquiries and solve any potential issues you might have with the use of our Services.

3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfill business obligations. We may process or share your data that we hold based on the following legal basis:

- Consent: We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- Legitimate Interests: We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a Contract: Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- Legal Obligations: We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

- Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- Business Transfers. We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

5. HOW LONG DO WE KEEP YOUR INFORMATION?

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

6. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using the Service, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the . If we learn that personal information

from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at privacy@getyourtrip.com.

7. WHAT ARE YOUR PRIVACY RIGHTS?

In some regions (like the EEA and UK), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you are a resident in the EEA or UK and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [European Data Protection](#)

If you are a resident in Switzerland, the contact details for the data protection authorities are available [Switzerland Data Protection](#)

If you have questions or comments about your privacy rights, you may email us at privacy@getyourtrip.com.

- Account Information If you would at any time like to review or change the information in your account or terminate your account, you can: Log in to your account settings and update your user account. Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, we may retain

some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

- Cookies and similar technologies: Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services.
- Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list — however, we may still communicate with you, for example to send you service-related emails that are necessary for the administration and use of your account, to respond to service requests, or for other non-marketing purposes. To otherwise opt-out, you may: Contact us using the contact information provided.

8. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy policy.

9. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information. California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a

year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with , you have the right to request removal of unwanted data that you publicly post on the . To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the , but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g. backups, etc.).

10.DO WE MAKE UPDATES TO THIS POLICY?

Yes, we may update this privacy policy from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a policy of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

11.HOW CAN YOU CONTACT US ABOUT THIS POLICY?

If you have questions or comments about this policy, you may email us at privacy@getyourtrip.com or by post to:

- getyourtrip Inc.
- 360 Huntington Ave
- Boston, MA 02155

- United States

12. HOW CAN YOU REVIEW, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please visit: [Edit profile](#)

Privacy Policy Justification Worksheet

1. Briefly describe the website you are building (its purpose/functionality/etc.)
 - We provide an online platform which connects flight tickets buyer(aka. Buyer in our project) and tickets providers which could be airplane companies or individuals who are selling tickets(aka. Agent in our project).
2. Identify the stakeholders (direct and indirect) whose interests are relevant to your website.
 - ticket buyers
 - ticket sellers
 - admins
3. What data will you have access to, and what might this data reveal about its subjects?

- Personal information provided by users. We collect names; phone numbers; email addresses; mailing addresses; usernames; passwords; debit/credit card numbers; billing addresses; and payment information.
4. What values are relevant to your website and its privacy policy? (Note that the relevant values will depend in part on the kind of website you are building).
- Autonomy
 - Meaningful information
 - Timeness
 - Transparency
5. What counts as “success” for the website you are building?
- Basic functionalities are working as expected.
 - Bring friendly user experiences
 - Solve users' problems effectively
 - The layout and color are pleasant
6. Describe how you took the relevant values into account in writing your privacy policy (e.g. what decisions and tradeoffs were made, and why).
- Meaningful information and Transparency
 - As a flight tickets platform, our users come from all over the world, so we have to consider different data protection policies enacted in different areas. In our privacy policy, we inform users about these differences and point them to websites where more information is provided.

- Appropriate flow of information. We applied this idea in Contextual Integrity invented by Dr. Helen Nissenbaum.
- Our website doesn't have social plug-ins that allow buyers and sellers to share transactions to social media platforms. We implemented it in this way due to two reasons:
 - The first one is that we support the idea of appropriate flow of information. In an offline transaction context, the flow of travel information or transaction information starts from a buyer and ends at the seller's side. If the buyer wants to share the transaction to his friends, he will do it by himself. He doesn't need the seller to help him to tell the transaction to his friends. This flow of information is considered as an appropriate flow of information. On our website, we play two roles: a seller and a buyer, interchangeably. When we're involved in a transaction with a buyer, we are playing seller's role . The transaction information should, like in the offline context, end at our side rather than publishing it through our website. The same logic applies to the transaction between a seller and us.
 - The second reason is that in this stage of our business, we are not ready to incorporate these social plug-ins to our websites.
- Autonomy
 - Our privacy policy page informs users how to request access, change, delete information we collect from them.
- Timeness.
 - We implemented a function which automatically updates the modified date on our privacy page just in case our employee forgets to update the date and time after he has modified the page.
- Transparency

- Our privacy policy page informs users what information we collect, how we use their information, and how long we keep their information. We also informs users their privacy rights.
- Meaningful information
 - When we were writing our privacy policy, we don't use obscure languages and legal terms because we were striving to make information readable, understandable and meaningful for our users. We designed our privacy policy page in Q&A format, which is easier to read and more specific.