

Tour East Group of Companies Privacy Notice

Tour East Holdings Pte Ltd which has its registered office at 79 Anson Road #12-01 Singapore 079906 (the “TE”) offers travel and destination management services and other related services worldwide through its group of companies (“TE Group”) and affiliates (TE Group and affiliates collectively referred to as “JTB Group”). This Privacy Notice is issued to you, Data Subject, to inform you of our collection, access, use and process your personal data in the way described below.

1. Categories of personal data

We hereby inform you that we collect, use and process the following categories of your personal data:

Name

Passport details

Flight details

Credit card details

E-mail addresses

Mailing addresses

Contact numbers

Photographs and Images

Food allergy (only if necessary and subject to Article 5 or 7 below as the case may be)

In addition to the above, we use Google Analytics to enhance user experience of our websites, therefore your IP addresses may also be collected by Google. In no way we are disclosed your IP addresses by Google.

For Tour East Smartphone Application users, Google may also collect, use and process your location data to provide you with our services. When you are in Singapore, Tour East Singapore (1996) Pte Ltd may collect, use and process your location data so as to provide you with our services such as providing you with information about places of interest around you, showing you the distance between current location and destination and some options to navigate to the attraction or the landmark you have chosen.

The Tour East Smartphone Application does not collect, use and process your data when you are still in the country of embarkation. Should you wish not to disclose your location when you are in Singapore to us, you may choose to dis-able the location sharing function within the Tour East Smartphone Application.

Kindly refer to Google’s privacy policy at <https://policies.google.com/privacy?hl=en> as may be updated and amended from time to time by Google, in which we have no control over.

2. Legal basis and purpose:

As per Article 6(1)(f) General Data Protection Regulation (“GDPR”) (if applicable) and any applicable local personal data protection laws, we hereby inform you that we use your personal data for the purpose of providing you following services:

- Making accommodation or hotel arrangements
- Making transportation arrangements
- Making restaurant arrangements or other food arrangements
- Making other services arrangements
- Supporting you with the tours or with preparations for the tours
- Managing the itinerary or the preparation of the itinerary
- Considering, entering into, or performing contracts or other relationship
- Responding to your queries or requirements
- Maintaining our relations with you
- Satisfaction surveys that you would complete
- Re-establishing our relationships
- Selling our or other person’s products or services
- Marketing/ Providing information regarding our or other person’s products, services or events or campaigns

In addition, your personal data may be converted into statistical or aggregated data which cannot be used to identify you and then used to produce statistical research and reports. This aggregated data may be shared and used in the ways described above.

TE Group processes your personal data in its interest as well as your interest, so TE Group provides and you receive the travel related services that you have requested and other related services specified in the above.

3. Retention periods

We keep your personal data as long as there is a statutory or legal requirement to do so or in order to provide the aforementioned services to you. For accounting or auditing purposes we may retain your personal data for a period of time after our direct business dealings have ended.

4. Data storage and transfer

Furthermore, we may share your personal data with JTB Group as well as with other companies who may be located within or outside the EEA such as hotels, accommodations, transportations, restaurants, tour operators, travel agencies, other service providers (including service providers for JTB Group). Where a company is located outside the EEA, we will arrange adequate safeguards such as Binding Corporate Rules or Standard Contract Clause arrangement or transfer your personal data based on appropriate legal basis, if required by GDPR.

5. Prior consent

Where GDPR is applicable and we require access to your Personal Data that GDPR considers Sensitive, we will seek separate explicit consent from you prior to obtaining that data.

6. Your rights

As a customer you have a number of rights among them: the right to request access to your personal data, to have it corrected or deleted, and the right to object to our processing of your personal data. For further information on these rights please refer to our Privacy Policies as follows:

- A) **For bookings within European Economic Area only** (ie. Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, UK, Iceland, Liechtenstein and Norway):

Online link to Privacy Policy: http://toureast.net/wp-content/uploads/2018/02/GDPR-Privacy-Policies_TEG.pdf

- B) **For bookings occurring outside the European Economic Area:**

Online link to Privacy Policy: http://www.toureast.net/wp-content/uploads/2018/02/PDPA_Website_TEHD-V2.pdf

7. For bookings within and outside the European Economic Area

Notwithstanding the foregoing, by providing us with the personal data in accordance with Article 1 above, you consent to us collecting, using and processing the personal data for the purpose mentioned in Article 2.

You warrant and represent the following:

- a) that the personal data provided by you belong to you;
- b) in the event that you have provided personal data of third parties for us to fulfil the purposes mentioned in Article 2 above, that you have obtained the consent of the third parties in question for us to collect, use and process their personal data for the purposes mentioned in Article 2 above.
- c) that the personal data are accurate as at the time of provision. If there is any changes to the personal data, please notify us at farah@toureast.net

8. Assistance

- A) **For bookings within the European Economic Area only:**

If you require assistance or further information about how your personal data is used by us then contact our Data Protection Team via email: private@jtb.com

If you are not completely satisfied with how personal data request was handled then you may contact your local Data Protection Supervisory Authority.

- B) **For bookings outside the European Economic Area:**

If you require assistance or further information about how your personal data is used by us then contact our Regional Data Protection Team via email: dpo.hq@jtbap.com

9. Applicability of provisions

The following provisions are applicable

A) For bookings within the European Economic Area:

Articles 1 (Categories of personal data), 2 (Legal basis and purpose), 3 (Retention periods), 4 (Data storage and transfer), 5 (Prior consent), 6(A) Yours rights for bookings within European Economic Area, 7 (For bookings within and outside the European Economic Area), 8(A) Assistance for bookings within the European Economic Area and this 9(A).

B) For bookings outside the European Economic Area:

Articles 1 (Categories of personal data), 2 (Legal basis and purpose), 3 (Retention periods), 4 (Data storage and transfer), 6(B) Yours rights for bookings outside the European Economic Area, 7 (For bookings within and outside the European Economic Area), 8(B) Assistance for bookings outside the European Economic Area and this 9(B).