

## Privacy Policy

This privacy and cookie policy was last updated November 17<sup>th</sup>, 2017

When you use Travelflex (“company”, “we” or “us”) – owned and operated by WPT Limited, room 2405 Progress Commercial Building, 9 Irving Street, Causeway Bay, Hong Kong - services, you trust us with your information. This Privacy Policy is to inform you how we collect and use the information collected.

### *Information you provide us directly:*

We ask for certain information (“Data”) such as your username, real name, birthdate, address, phone number, e-mail address, location, bank account number, geographical position, usage data or any other (personal) details when you register for a Travelflex account, or if you correspond with us. We may also retain any messages you send through the Website and/or application, and we may collect information you provide in user content you post to the Website and/or application.

### *Processing your information:*

The Data Controller processes your information in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the data may be accessible to certain types of persons in charge, involved with the operation of the site or external parties appointed, if necessary, as Data Processors by the Company. The updated list of these parties may be requested from the Data Controller at any time. The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller. The data is kept for the time necessary to provide the service requested by you, or stated by the purposes outlined in this Privacy Policy, and you can always request that the Data Controller suspend or remove your data.

### *Use of collected data:*

The data concerning you is collected to allow the Company to provide its services, as well as for the following purposes: Analytics, Contacting the User and Location-based interactions. Your information used for each purpose is outlined in the specific sections of this document. Personal Data is collected for the following purposes and using the following services: Google Analytics (Google Inc.) - The services contained in this section enable the Company to monitor and analyze web traffic and can be used to keep track of User behavior. Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of the Travelflex website and its services ("Website"), to prepare reports on its activities and share them with other Google services. Google may use the Data collected to contextualize and personalize the ads of its own advertising network. The Website may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, your location data may be tracked by this Website. This Website may collect, use, and share User location Data in order to provide location-based services. Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application. The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services. You declare to be aware that the Data Controller may be required to reveal personal data upon request of public authorities. In addition to the information contained in this Privacy Policy, this Website may provide you with additional and contextual information concerning particular services or the collection and processing of Data upon request. For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Data (such as IP Address).

*Keeping your information safe:*

Travelflex cares about the security of your information. We take reasonable measures (such as requesting an unique password) to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction, and to verify your identity before granting you access to your account. We will only use your personal information to administer your account and to provide the products and services you have requested from us. However,

you are responsible for maintaining the secrecy of your unique password and/or pin code and account information, and for controlling access to your communications. Travelflex can not ensure or warrant the security of any information you transmit to Travelflex or guarantee that information on the Website and/or application may not be accessed, disclosed, altered or destroyed. Your privacy settings may also be affected by changes to the functionality of third party sites and services that you add to the Travelflex services, such as social networks. Travelflex is not responsible for the functionality or security measures of any third party. These third party sites have separate and independent privacy policies. We have therefore no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Website and/or application and welcome any feedback about these sites.

*Sharing your information:*

We may share information about you:

- With service providers who need access to such information to carry out work on our behalf;
- In response to a request for information if we believe disclosure is in accordance with any applicable law, regulation or legal process, or as otherwise required by any applicable law, rule or regulation;
- If we believe your actions are inconsistent with our Terms and Conditions and/or other agreements or policies, or to protect the rights, property and safety of us or any third party;
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you.

*Account information*

You may update, correct or delete your online account information at any time by logging into your account or by contacting us at [support@Travelflex.org](mailto:support@Travelflex.org). Please note that we may retain

certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

### **Cookies**

Most web browsers are set to accept cookies – a small text file containing a string of alphanumeric characters that uniquely identifies your browser - by default. We may use cookies – or any other tracking tool - to convey information to us about how you use the Website and allow us or our affiliates to track your usage of the Website over time. If you prefer, you can set your browser to remove or reject cookies, but note that doing so does not necessarily affect third party flash cookies used in connection with our Website. If you choose to remove or reject cookies, this could affect the availability and functionality of our Website.

### **Translations**

This Private Policy contains translations of the English version of the Private Policy. These translations are provided to you only as a convenience. In the event of any conflict between the English language version of the Privacy Policy and the translated version of the Privacy Policy, the information on the English language version shall take precedence. If you notice any inconsistency, please report them on/to [support@Travelflex.org](mailto:support@Travelflex.org).

### **Changes to the Terms and Conditions**

We may revise and update these Terms and Conditions at any time, in our sole discretion and without prior notice. All changes are effective immediately upon posting. Your continued use of the Website following the posting of the revised or updated Privacy Policy means that you accept and agree to the changes. Please refer to the header of these Privacy Policy to view the date of the last updated version.