



# FROSCH International Travel Privacy Notice

FROSCH International Travel, Inc. respects your privacy and is committed to honoring the confidence our clients, business partners and our workforce place in us. We have created this Privacy Notice to demonstrate our firm commitment to data protection and compliance with global privacy laws. This Privacy Notice outlines how we handle data that can be used to directly or indirectly identify an individual (“Personal Data”).

## Who we are

FROSCH International Travel, Inc. and its Affiliates (FT Global, LLC and FT Travel, Inc.), (collectively known as “FROSCH International Travel”, “FROSCH”, “we” or “us”) is a global travel services company that serves corporate and individual client travel needs and other travel related services. Our FROSCH International headquarters are located at One Greenway Plaza, Suite 800 Houston, TX 77046 in the USA, and we have offices in 40+ countries around the globe.

In this Privacy Policy (the “Policy” or “Notice):

“third party” means someone who is not you or us

“FROSCH International Travel” means FROSCH International Travel, Inc. and any company or other organization in which FROSCH owns more than 15% of the company

- FROSCH International is the Data Processor within the meaning of the General Data Protection Regulation (“GDPR”) for global Corporate Travel Management services on behalf of its clients
- FROSCH International is the Data Controller within the meaning of the General Data Protection Regulation (“GDPR”) for frosch.com and related travel websites; Workforce Administration (including Recruitment) and Leisure related Travel services
- FROSCH UK Ltd. is the EU Data Controller within the meaning of the General Data Protection Regulation (“GDPR”) for EU Workforce Administration (including Recruitment) and EU Leisure Travel services

FROSCH’s data protection officer is Veronika Tonry who can be contacted at [DPO@frosch.com](mailto:DPO@frosch.com).

## Personal Data We Collect

We collect your Personal Data for a variety of reasons. You may provide the data to us directly, or through a tool or product provided by us or another organization, or to your employer in the case of our business clients.

## Corporate Business Travel Services

We collect your Personal Data, and that of your travel companions, either directly from you or through your employer or travel sponsor, in order to provide you with the travel-related services. In most cases, it consists of

- Full Legal Name
- Email address
- Postal address
- Phone number
- Credit card number or other payment information

We may collect other information to assist you with your travel plans including but not limited to, passport number, driver's license or other government-issued identification number, date of birth, gender, arrival and departure locations and times, airline and accommodations, hotel or car rental frequent loyalty numbers, TSA Known Redress Number and global entry number, Ticket/Document number and other related travel information.

We may receive Personal Data from your employer or travel sponsor, such as your name, job title, employer name, employee identification number/employee ID, email address, work address, and your phone number.

## Leisure Travel Services

We collect your Personal Data, and that of your travel companions, directly from you or through a tool or product provided by us or another organization, in order for us to deliver the travel-related services you have requested. In most cases, it consists of

- Full Legal Name
- Email address
- Postal address
- Phone number
- Credit card number or other payment information

We may collect other information to assist you with your travel plans including but not limited to, passport number, driver's license or other government-issued identification number, date of birth, gender, arrival and departure locations and times, airline and hotel accommodations, hotel or car rental frequent loyalty numbers, TSA Known Redress Number and global entry number, Insurance details,

relevant medical data and any special, dietary, religious or disability requests, Ticket/Document number and other related travel information.

## Website Data Collection

On our Website through contact forms, job applications or marketing events, we may collect the following information from you that may constitute Personal Data:

- Name
- Job title
- Company name
- Type of Industry
- Phone number
- Email address
- Your account login details, such as your username and the password you chose
- Details about your travel interests and comments that may include Personal Data
- Individual public testimonials
- Job Applications: Information included in your job application including, but not limited to, information included in your resume.

## Information We Collect Through Automatic Data Collection Technologies

Whenever you visit our Site, use our services, or view our online advertisements, the website software automatically collects the following information, some of which may be considered Personal Data:

- Website use event data, such as: which links or buttons you have clicked, search terms and the pages you have viewed
- Travel and Social preferences, interests and activities
- The type of device you are using to access the Website
- The IP address from which you access the Website
- The name and version of the device operating system
- The logging technology used on the Website automatically collects the URL of the site from which you came and the site to which you are going when you leave the Website
- Cookie Data: A “cookie” is data that a website server stores on your computer. Cookies enable websites to recognize your computer and to “remember” your entries as you move from page to page, or even when you revisit the site from time to time using the same computer
- Google Analytics: By using cookies, Google Analytics collects and stores data such as time of visit, pages visited, time spent on each page of the website, the IP address, and the type of operating system used in the devices used to access the Website. By using a browser plugin provided by Google, you can opt out of Google Analytics

You can learn more about how we use cookie data by reviewing our Cookie Policy which can be found in the “**Cookie Policy**” section of this document.

# Other sources of Personal Data

- We may use Personal Data from other sources, such as affiliates and 3<sup>rd</sup> parties that supply information, retail partners and public registers
- Your insurance company, their agents and medical staff may exchange relevant Personal Data and special categories of Personal Data with us in circumstances where we/they need to act on your behalf or in the interest of other customers or in an emergency.
- If you log-in using your social network credentials to connect to our platforms and online services e.g. Facebook, Google+ and Twitter, you will agree to share your user details with us. For example, your name, email address, date of birth, location and any other information you choose to share with us.

## How we use Personal Data

### We use Personal Data for the following purposes

- Travel Services & Products: To provide, operate, develop, and improve our travel products and services
- Processing of Payment for Travel or travel related services
- Customer Service: To operate and improve Client and traveler customer service
- Engagement: To communicate with you, including responding to your comments or requests for information
- Corporate Travel: Establishing, managing and terminating business relations with Client
- Website Management to:
  - Operate, develop, improve, and protect the Website
  - Audit and analyze the Website
  - Content Management and Personalize user experience
  - Ensure the technical functionality and security of the Website
- For market research and electronic direct marketing, in accordance with applicable law;
- For recruiting and hiring purposes
- To prevent and investigate fraud and other misuses
- Legal Compliance: Enabling FROSCHE to comply with laws, regulations, or legal requests for the Personal Data
- To protect FROSCHE, its employees, affiliates and other clients against error, fraud, theft, and damage to our goods and property
- To protect our rights and/or our property
- For any other reasonable business purposes about which we notify you and to which you consent

## Legal Basis for Personal Data

We will only collect and use your Personal Data, if at least one of the following conditions applies:

- A **contract** is in place with you, such as for travel management. We need to process your Personal Data so that we can manage your account or booking, provide you with the products and services you want to buy, and help you with any bookings, cancellations and refunds.

- FROSCH has **legitimate business interests**, for example: fraud prevention, maintaining the security of our network and services, and the improvement of our services. If you are a prospective customer, the Personal Data we collect, and use is necessary for our legitimate interest in providing you with information about the services we offer, and about which you have expressed an interest or that we believe will be of benefit to you. Where appropriate, we will obtain your consent at the time we communicate with you. Whenever we rely on this lawful basis to process your data, we assess our business interests to make sure they do not override your rights. Additionally, in some cases you have the right to object to this processing. For more information, visit the **'Your rights'** section of this policy
- Compliance with a mandatory **legal obligation**, for example, sharing Personal Data with regulatory authorities so you can travel. It may be mandatory (as required by government authorities, such as US secure flight data) to disclose and process your Personal Data for immigration, border control, security and anti-terrorism purposes.
- It is necessary to protect your **vital interests** or those of another individual, for example: in an emergency your insurance company or medical staff may exchange relevant Personal Data and Special categories of Personal Data with us in circumstances where we/they need to act on your behalf.
- We have your **consent**. For instance, you give us permission to process your Personal Data when you register for a customer account. When you give us your consent, you will be given details on how to change your mind or visit the **'Your rights'** section of this policy for more information.

## How we share Personal Data

We may disclose the Personal Data we collect to the following:

- The global distribution systems ("GDS"), a software-based service for making travel reservations;
- Service providers such as Travel Suppliers or other third-party service providers necessary to the operation of our business. We require all such service providers to act in compliance with this Privacy Policy
- Other third parties, including our affiliates, or with employees, agents, consultants and other parties who require the information to assist us to establish, maintain and manage our business relationship with you.
- Our clients that request the data relating to travel services utilized by their employees;
- Our corporate clients as part of their operational and financial corporate travel management
- Subcontractors such as travel support service providers
- Industry reporting authorities and other entities necessary in providing travel services;
- To public authorities, such as law enforcement, if we are legally required to do so or need to protect our rights or the rights of third parties.
- Affiliates or Acquired Companies: As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or we acquire another company, the information we have about you will be transferred to and used by the acquiring entity.
- We may disclose information to third parties in an aggregate format that does not constitute Personal Data and does not allow for the direct identification of individual users of the Website or individual travelers.

We do not sell or share information with third parties so that they can independently market their own products or services directly to you.

# Sharing Personal Data with FROSCH affiliates

Our Privacy Notice applies to services offered by FROSCH International Travel but excludes services or affiliates that have separate privacy notices. We may share the minimum Personal Data necessary with other companies affiliated with FROSCH, for example, to provide the products and services you request; to manage and improve our products, services and day-to-day operations; where appropriate, to make contact and interact with you; and, if allowed and appropriate, for marketing or market research purposes.

We may also share Personal Data with an organization we sell or transfer (or enter into negotiations to sell or transfer) any of our businesses or any of our rights or obligations under any agreement we may have with you. If the transfer or sale goes ahead, the organization receiving your Personal Data can use your data in the same way as us.

## Linked Sites

This Policy does not apply to your use of unaffiliated websites to which our Site is linked. Company is not responsible for the privacy practices or the content on linked sites. We recommend that you carefully read the privacy policies of each site you visit.

## Social media features

Our websites or mobile apps may contain social media features such as Facebook, Twitter, LinkedIn and Instagram that have their own privacy notices. Please make sure you read their terms and conditions and privacy notice carefully before providing any Personal Data as we do not accept any responsibility or liability for these features. When we use social plug-ins on our websites from social networks such as Facebook, Twitter, LinkedIn and Instagram, we integrate them as follows:

- When you visit our websites, the social plug-ins are deactivated, i.e. no data is transmitted to the operators of these networks. If you want to use one of the networks, click on the respective social plug-in to establish a direct connection to the server of the respective network
- If you have a user account on the network and are logged in when you activate the social plug-in, the network can associate your visit to our websites with your user account. If you want to avoid this, please log out of the network before activating the social plug-in.
- When you activate a social plug-in, the network transfers the content that becomes available directly to your browser, which integrates it into our websites. In this situation, data transmissions can also take place that are initiated and controlled by the respective social network. Your connection to a social network, the data transfers taking place between the network and your system, and your interactions on that platform are governed solely by the privacy policies of that network.
- The social plug-in remains active until you deactivate it or delete your cookies.

# Safeguarding Personal Data

We use adequate technical and organizational security measures to protect your data managed by us against manipulation, loss, destruction and against access by unauthorized persons. We are constantly improving our security measures in line with technological developments. Although FROSCH makes every effort to ensure the protection, integrity and security of FROSCH's network and systems, FROSCH cannot guarantee or warrant that the security measures will protect all Personal Data.

The security of your data also depends on you. For example, where you have chosen a password for access to certain services, you are responsible for keeping this password confidential.

## Data Retention

We will retain your Personal Data for only as long as it is necessary for the uses set out in this Privacy Notice and/or to meet legal and regulatory requirements. After this period, we will securely erase Personal Data. If data is needed after this period for analytical, historical or other legitimate business purposes, we will take appropriate measures to anonymize or destroy this data.

## Your Rights and Choices

### Marketing Communications

If you receive marketing email from us, you may unsubscribe at any time by following the instructions contained within the email. You may also opt-out from receiving commercial email from us, and any other promotional communications that we may send to you from time to time, by sending your request by email to [privacy@frosch.com](mailto:privacy@frosch.com).

Please be aware that if you opt-out of receiving commercial email from us or otherwise modify the nature or frequency of promotional communications you receive from us, it may take up to ten business days for us to process your request, and you may receive promotional communications from us that you have opted-out from during that period. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages regarding travel services.

# Information Collected by Automated Means

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of our Site.

Please note that there is currently no uniform way in which to respond to Do Not Track signals, and at this time we do not respond to such signals.

## Your European Privacy Rights and Choices

If you live in the EU or Switzerland, you have specific rights for your Personal Data under the European General Data Protection Regulation (GDPR). At FROSCH we address your rights for:

- **Data Access:** You have a right to ask for a copy of the Personal Data we hold about you. You can write to us asking for a copy of other Personal Data we hold about you. Please include any details to help us identify and locate your Personal Data. Where we can provide data access, we will do so free of charge except where further copies are requested, in which case we may charge a reasonable fee based on administrative costs.
- **Data Correction and Deletion:** We want to make sure that the Personal Data we hold about you is accurate and up to date. If any of the details we hold appear to be incorrect, please let us know. We will update or erase your data, unless we have to keep it for legitimate business or legal purposes.
- **Data portability:** You have the right to be able to take with you the Personal Data you provided to us in certain circumstances.
- **Right to object to use of Personal Data:** You have the right, in certain circumstances, to object to FROSCH processing your Personal Data.
- **To opt out of marketing messages:** If you no longer want to receive marketing messages from FROSCH, you can choose to opt out at any time. If you've previously opted in to receive personalized content based on how and where you use our network, you can also opt out at any time.

FROSCH will offer EU and Swiss individuals whose personal information has been transferred to us the opportunity to choose whether the personal information it has received is to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. An individual may opt-out of such uses of their personal information by contacting us at [privacy@frosch.com](mailto:privacy@frosch.com). If we intend to disclose it to a third party acting as a controller not previously identified, we will offer you the opportunity to opt-out of such uses and/or disclosures where it involves non-sensitive data or opt-in where Sensitive Personal Data is involved...

If we intend to use your Personal Data for a purpose that is materially different from the purposes listed in this Notice, or if we intend to disclose it to a third party acting as a controller not previously identified, we will offer you the opportunity to opt-out of



such uses and/or disclosures where it involves non-sensitive data or opt-in where Sensitive Personal Data is involved.

**Please note:**

- **We will not be able to delete information that is required to maintain our business purpose or that is required to facilitate your contract with us or to perform the services you have otherwise requested from us.**
- We may **ask you to verify your identity** before we can act on your request or complaint. We may also ask you for more information to help ensure that you are authorized to make such a request or complaint when you contact us on behalf of someone else.

For more information or to exercise your rights, please submit a request via post or email to FROSCH. We will respond to inquiries directed to us within thirty (30) calendar days. If the request pertains to data that was provided to us by your employer, please contact your employer (i.e. our client).

By post: FROSCH UK Ltd.

Attn: Data Protection Officer

The Eastcheap Estate: 39 Eastcheap, 4th Floor

London EC3M 1DE

United Kingdom

By email: [Privacy@FROSCH.com](mailto:Privacy@FROSCH.com)

You can also contact us, if you have a complaint about how we collect, store or use your Personal Data. Please submit any complaints in writing to the Data Protection Officer:

By email: [DPO@FROSCH.com](mailto:DPO@FROSCH.com) Subject: DPO Complaint

By post: Veronika Tonry FROSCH DPO

Stresemannstr. 59

10963 Berlin

Germany

If you would like more information about data protection and your Personal Data rights in general, please visit the European Data Protection Supervisor's site at <https://edps.europa.eu/data-protection/>

If you are not happy with our response to your requests, you may lodge a complaint with the data protection authority in your country.

# Your California Privacy Rights

If you live in California, you have specific rights for your Personal Data under the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice. This section describes your CCPA rights and explains how to exercise those rights.

## Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal data over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal data we collected about you.
- The categories of sources for the personal data we collected about you.
- Our business or commercial purpose for collecting or selling that personal data.
- The categories of third parties with whom we share that personal data.
- The specific pieces of personal data we collected about you (also called a data portability request).
- If we sold or disclosed your personal data for a business purpose, two separate lists disclosing:
  - sales, identifying the personal data categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal data categories that each category of recipient obtained.

In the preceding twelve (12) months, we have not sold any personal data.

## Deletion Request Rights

You have the right to request that we delete any of your personal data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and request our service providers to delete) your personal data from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected the personal data, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and fix errors that impair existing intended functionality.
- Exercise free speech ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.

- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Access, Data Portability, and Information Deletion Rights**

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at [privacy@FROSCH.com](mailto:privacy@FROSCH.com)
- Writing to us at FROSCH International Travel Attn: Data Privacy; One Greenway Plaza, Suite 800 in Houston, TX 77046 USA

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal data. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request and confirm the personal data relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal data provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### **Response Time**

We try to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal data that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

## Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

## Do Not Track

The California Online Privacy Protection Act (“CalOPPA”) requires FROSCH to disclose how it responds to Do Not Track Signals in your web browser. FROSCH does not interpret or respond to Do Not Track Signals. You may set your web browser to not accept new cookies or web beacons or disable cookies altogether. Please note that doing so may hinder your experience on the Website. Please see the Help section of your browser for instructions on managing security preferences.

# Privacy of Children’s Information

Our Site is not directed to children. We do not sell products or services for purchase by children. We will not knowingly collect Personal Data from children. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us, please contact us at this email address: [privacy@frosch.com](mailto:privacy@frosch.com). A parent or guardian of a child under the age of 13 may review and request deletion of such child’s Personal Data, as well as prohibit the use of that information.

## How to Contact us

Please contact us with any questions or comments about this Policy, your Personal Data, our privacy and information security practices, your consent choices or if you would like to exercise your rights.

Email at [privacy@frosch.com](mailto:privacy@frosch.com)

Data Protection Officer by email at [DPO@frosch.com](mailto:DPO@frosch.com)

You may also write to us at:

FROSCH International Travel  
One Greenway Plaza, Suite 800  
Houston, TX 77046 USA

# Changes to This Policy and Definitions

## Policy Changes

This Notice replaces all previous versions. We may change the Notice at any time, so please check it regularly on our website(s) for any updates. You can tell when

changes have been made to the Privacy Policy by referring to the “Last Updated” legend on top of this page. Any changes will be effective on the effective date stated in the revised Privacy Policy. Your continued use of the Site after we have posted a revised Privacy Policy indicates your agreement to the revisions.

## Definitions

For purposes of this Policy, the following definitions shall apply:

“Affiliate” means any partner that FROSCH has 15% or more ownership in.

“Agent” or “Processor” means any third party that collects or uses Personal Data under the instructions of, and solely for, FROSCH International Travel or to which FROSCH International Travel discloses Personal Data for use on FROSCH International Travel’s behalf.

“CCPA” or “California Consumer Privacy Act” also known as AB-375, is a bill intended to enhance privacy rights and consumer protection for residents of California, United States.

“FROSCH International Travel” means FROSCH International Travel, its affiliates under common control, predecessors, successors, subsidiaries, divisions and groups in the United States.

“GDPR” or “General Data Protection Regulation”, also known as Regulation (EU) 2016/679, is a European Union law drafted on April 27, 2016 and instituted on May 25, 2018 on data protection and privacy for all individual citizens of the European Union and the European Economic Area.

“Personal Data” means any information or set of information that identifies or could be used by or on behalf of FROSCH International Travel to identify an individual. Personal Data does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public Personal Data.

“Sensitive Personal Data” or “Special Categories of Personal Data” This are categories of personal data revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data, biometric data for the purpose of uniquely identifying a natural person; health data; and data concerning a natural person’s sex life or sexual orientation. In addition, FROSCH International Travel will treat as sensitive Personal Data any information received from a third party where that third party treats and identifies the information as sensitive.

“Data Controller”: The data controller determines the purpose and manner in which personal data is used.

“Data Processor”: Processes Personal Data as instructed on behalf of a data controller

“European Economic Area (EEA)” consist of EU Member States plus Norway, Iceland and Lichtenstein.

“Online advertising” refer to Marketing messages that you may see on the internet.

“US Secure Flight Data”: The Transportation Security Administration (TSA) requires you to provide your full name, date of birth and gender for the purpose of watch list screening. You may also provide your Redress Number, if available. Failure to provide details may result in denial of transport or denial of authority to enter the boarding area. TSA may share information you provide with law enforcement or intelligence agencies or others under its published system of records notice. Please see the TSA website for more details.

## Privacy Shield

We may transfer your Personal Data to countries other than the country where you are located, including to the United States where we are headquartered.

The EU-U.S. and Swiss-U.S. Privacy Shield Frameworks were designed by the U.S. Department of Commerce, and the European Commission and Swiss Administration, respectively, to provide companies on both sides of the Atlantic with a mechanism to comply with data protection requirements when transferring Personal Data from the European Union and Switzerland to the United States in support of transatlantic commerce.

FROSCH International Travel, Inc. complies with the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred from the European Union and Switzerland to the United States. FROSCH International Travel, Inc. has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability. If there is any conflict between the terms of this Privacy Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

**Dispute Resolution:** In compliance with the Privacy Shield Principles, FROSCH International, Inc. commits to resolve complaints about our collection or use of your Personal Data. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact FROSCH at: FROSCH International Travel, Inc.

c/o Veronika Tonry, DPO

One Greenway Plaza, Suite 800

Houston, TX 77046

or via email at [DPO@FROSCH.com](mailto:DPO@FROSCH.com)

FROSCH has further committed to refer unresolved privacy complaints under the EU-U.S. and Swiss-U.S. Privacy Shield Principles to an independent dispute resolution mechanism:

- for disputes involving all Personal Data received by our company from Switzerland, our company has agreed to cooperate with the Swiss FDPIC: <https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/links/data-protection—international.html>
- for disputes involving all Personal Data received by our company from EU countries, we commit to refer unresolved complaints under the Privacy Shield Principles to an independent dispute resolution panel established by European Union Data Protection Authorities. Please contact the Data Protection Authority in your country for your complaint:

[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

Under certain limited conditions, an individual may be able to invoke binding arbitration as provided under the Privacy Shield to address an otherwise unresolved complaint. For more details about this process, visit the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>. FROSCH International Travel, Inc. is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) and under certain conditions, individuals may invoke binding arbitration as well as learn more about our liability in cases of onward transfers to third parties at: <https://www.privacyshield.gov/EU-US-Framework>.

## International Transfers of Personal Data

Personal data, including data collected in the European Economic Area (“EEA”) or Switzerland, may be transferred, stored, and processed by us and our services providers, partners, and affiliates in the United States and potentially other countries whose data protection laws may be different to the laws of your country.

We will not transfer Personal Data originating in the EU or Switzerland to third parties unless such third parties have entered into an agreement in writing with us requiring them to provide at least the same level of privacy protection to your Personal Data as required by the Principles of the EU-US Privacy Shield Framework or the Swiss-US Privacy Shield Framework. We will only transfer data to our agents, affiliates, or third-party service providers (such as accountants, attorneys, consultants, and other service providers) who need the information in order to provide services to or perform activities on behalf of FROSCH; including in connection with the delivery of services, FROSCH's management, administration, or legal responsibilities. We shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless we prove that we are not responsible for the event giving rise to the damage.

## Cookie Policy

We use or may use the data collected through cookies, log files, device identifiers, and clear GIFs to (a) remember information so in subsequent visits a user will not have to re-enter it; (b) provide custom, personalized content, and information; (c) monitor the effectiveness of our Services; (d) monitor aggregate metrics such as total number of visitors, traffic, and usage on our website and our Services; (e) diagnose or fix technology problems; and (f) help users efficiently access information after signing in.

Clear GIFs, pixel tags, and other technologies: Clear GIFs (also known as web beacons, web bugs or pixel tags) are tiny graphics with a unique identifier, similar in function to cookies. In contrast to cookies, which are stored on your computer's hard drive, clear GIFs are embedded invisibly on web pages. We may use clear GIFs, in connection with Services to, among other things, track the activities of visitors, help us manage content, and compile statistics about site usage. We and our third-party service providers also use clear GIFs in HTML emails to our customers to help us track e-mail response rates, identify when our e-mails are viewed, and track whether our e-mails are forwarded.

Third-Party Analytics: We use automated devices, applications, and other means, such as Google Analytics to evaluate usage of our FROSCH websites and Services. We use these tools to help us improve our Services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services. Third-party advertising networks are never allowed to collect information about the users of our websites or Services.

Effective Date: January 2020