

Privacy Policy

(Protection of Personal information Act, No 4 of 2013)

The Travel Management Company Proprietary Limited (registration number 2022/523589/07) ("**TTMC**") is a travel services company specialising in corporate, leisure and public sector travel arrangements. It also has a number of Independent Travel Professionals who make use of the TTMC Booking Platform.

TTMC adheres to the highest standards of protecting your personal information when you use our travel arrangement services via the TTMC Booking Platform and when accessing our website or any of our related blogs, applications or platforms (collectively "**Services**").

We have compiled this Privacy Policy for you to understand how we safeguard your personal information and respect your privacy ("**Policy**"). This Policy applies to all our customers who avail themselves of our Services. It also applies where any person or entity makes enquiries regarding our Services and who may not be a past or existing customer.

In some circumstances, TTMC is the "**responsible party**" as defined in the Protection of Personal Information Act No 4 of 2013 ("**POPIA**") and is responsible for your personal information (collectively and interchangeably referred to as "**we**", "**us**" or "**our**" in this Policy) in instances where we manage the processing operations concerning your personal information.

Sometimes we are also an "**operator**" (as defined in POPIA) processing personal information on behalf of a third-party responsible party, in which

case that responsible party's privacy terms will apply. The terms "**user**", "**you**", "**data subject**" "**customer**" and "**your**" are used interchangeably in this Policy and refer to all persons accessing or utilising our Services for any reason whatsoever.

We have appointed a data representative at TTMC who is responsible for overseeing questions in relation to this Policy. If you have any questions about this Policy, including any requests to exercise your legal rights (as more fully contained in POPIA), please contact the representative using the details set out below.

Full name of legal entity:

The Travel Management Company Proprietary Limited (registration number 2022/523589/07).

Groenkloof Office Forum, 57 George Storrar Drive, Groenkloof, Pretoria 0027.

Name of data representative:

Matthew Kelly (Managing Director).

Postal address:

P O Box 4075, Pretoria 0001.

Telephone number: XXX

Email: XXX

You have the right to make a complaint at any time to the Information Regulator. We would, however, appreciate the chance to deal with your concerns before you approach the regulator, so please contact us in the first instance.

Personal information we collect from you:

Should you decide to engage with us and/or use any of our Services, you thereby expressly consent to, and opt-in to TTMC collecting, collating, processing, and using the following types of information about you (“**personal information**”):

Information provided by the user or from a user’s other authorised responsible party:

TTMC processes personal information (that is information about the user that is personally identifiable like the user’s name, address, date of birth, age, gender, email address, company name, company registration number, contact details, phone number(s) and other unique information such as service preferences and contact preferences that are not otherwise publicly available) which TTMC either processes as its own responsible party, or which is received from another responsible party to whom you have provided your personal information with your permission to be shared with TTMC as the operator.

Information that is collected automatically:

TTMC receives and stores information which is transmitted automatically from the user’s computer when the user browses the internet and accesses TTMC’s services. This information includes information from cookies (which are described below), the user’s Internet Protocol (“IP”) address, browser type, embedded web links, and other commonly used information-gathering tools. These tools collect certain standard information that your browser sends to a website e.g browser type and language, access

times, and the address from which you arrived at the website.

Change of Personal Information:

Should your personal information change, please update it by providing us with updates to your personal information as soon as reasonably possible to enable us to update our records. TTMC will, however, not be able to update any personal information of yours obtained from another responsible party. Where you want to update this personal information, you must approach the relevant responsible party to do so. TTMC is under no obligation to ensure that your personal information or other information supplied by you is correct.

Personal Information of Minor:

We will only process the necessary personal information of children under the age of 18 years where the parents, or guardian, give us express written authority to do so and in such event only for the purposes of providing travel related services in the normal course of our business.

Warranty of correctness of information:

You warrant that the personal information disclosed to TTMC is directly from you as the user in connection with the Services, and all such personal information is lawfully yours to provide. You also warrant that any personal information provided to us from a third-party responsible party, was obtained from you lawfully and provided to us with your express consent to the relevant responsible party to do so.

You may choose to provide additional personal information to us, in which

event you agree to provide accurate and current information, and, generally, not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.

When do we collect your personal information:

We will process your personal information in the following circumstances:

- you submit an enquiry and/or contact us or request that we contact you;
- you visit or browse our internet presence;
- when you contract with us to be a provider of the Services to you;
- you complete a booking document requiring that we provide any of our Services;
- you complete a client information form (or give us your information in any other format) which we require in order to provide you with any of our Services;
- you make use of our Services.

How we use your personal information:

Any processing of your personal information will be for our legitimate business purposes and as a necessary function of your engagement to make use of our Services, and you have expressly consented to this by making use of our Services.

We will not, without your express consent, use your personal information for any purpose **other than as set out below**:

- in relation to the provision to you of the Services;
- to fulfil orders for Services;
- to contact you as requested by you;
- to enable you to provide us with your contracted services;
- for internal record keeping of responsible party third parties and the development of metrics of third-party searches;
- for preparing reports for internal use or for the use of a customer of ours and any customer report will contain personal information solely pertaining to the Services offered to such customer;
- to contact you regarding current or new Services or any other product offered by us;
- to improve our Services; or
- disclose your personal information to a third-party other than as set out below:
 - to our employees and/or third-party service providers whose services and products are required in order for us to provide you with the Services (e.g. airlines, car hire companies, hotels, B & Bs);
 - to other external responsible parties who

already have your express consent to process and/or obtain such personal information;

- to capture personal information in the travel GDS systems (e.g. Amadeus, Travelport and Sabre);
- to our professional services providers (such as our insurers or attorneys) where we believe that it is required under our contractual relationship with our professional services providers to do so;
- to law enforcement, government officials, fraud detection agencies or other third-parties when we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report or support the investigation into suspected illegal activity or the contravention of an applicable law, or to investigate violations of this or to protect and defend our rights or property; and
- to our service providers who help with our business operations (travel services providers, fraud prevention, marketing, technology services, HR consultants etc). However, our contracts

dictate that these service providers may only use your information in connection with the services they perform for us, not for their own benefit and under the same standards as how we operate.

Our legal justification for processing your personal information:

Your use of any of our Services constitutes your explicit opt-in consent to our processing of your personal information. You will have obtained the written consent of each of your employees, and other officials within your organisation who will be making use of the Services. Further, we also rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal information when you place an order for any products and/or Services. Alternatively, in some cases, we rely on our legitimate interests as a business (e.g. to measure user satisfaction and troubleshoot user issues). Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

Subject to the other provisions in this Policy, the following constitutes our reasons for processing your personal information:

To make our products and Services available to you:

- we use personal information to provide you with information, products and Services that you request or purchase from us (i.e. to complete certain tasks,

processes or orders and deliver our products and/or Services to you), and to communicate with you regarding those products or Services that you acquired from us and respond to your questions and comments.

- we may also use your personal information to measure how satisfied our users are and provide user service (including troubleshooting in connection with purchases or your requests for Services or when you ask us questions on social media).
- in order to allow third-parties to make their independent services available to you:
 - you expressly understand and agree that third-party product and/or service providers may have their own privacy policies governing how they process personal data, which you may be compelled to adhere to;
 - we use this information to develop and improve our Services and our customer relationships. Your job role, organisation and some or all of your comments may be publicly displayed on our website as a testimonial. We will do this based on our legitimate interest in explaining our Services.

For administrative and internal business purposes:

We may use your personal information for our internal business purposes, such as administrative fulfilment of orders, administrative fulfilment of invoices, project management and internal and external reporting. We may also use your data to monitor the use of our digital services, where applicable.

For security and legal reasons:

We use your personal information to:

- ensure the personal and financial information you provide us is accurate;
- conduct fraud checks or prevent other illegal activity;
- protect our rights or property (or those of others); and
- fulfil our legal and compliance-related obligations.

In some cases we will use your personal information because it's necessary for us to comply with a legal obligation (such as if we receive a legitimate request from a law enforcement agency). In other cases (such as the detection of fraud) we will rely on our legitimate interests as a business to use your personal information in this way. Where we rely on our legitimate interests, we will always make sure that we balance these interests against your rights.

In regard to your relationship with us:

We use your personal information to personalise your experience with TTMC to:

- provide you with non-marketing correspondence via hand-delivery, SMS, facsimile, post and email;
- contact you when requested by you, or in relation to the Services we are providing to you, via telephone or through any other physical or electronic medium;
- carry out limited automated decision making (segmentation) based on the information you have given us when we segment our customer database to determine which offers that you may be interested in.

Links to Other Websites:

Our website may contain hyperlinks to websites that are not operated by us. These hyperlinks are provided for your reference and convenience only and do not imply any endorsement of the activities of these third-party websites or any association with their operators.

We do not control these websites and are not responsible for their data or privacy practices. We urge you to review any privacy statement posted on any site you visit before using the site or providing any personal information about yourself and others.

Use of Mobile Apps:

When you use a TTMC Mobile App, we collect and use information about you in the same way and for the same purposes as we do when you use our website. In addition to this, we also use some other information that we collect automatically when you use our Mobile Apps. Specifically:

- we collect information about Mobile App functionality that you access and use. This allows us to identify those areas of the Mobile App that are of interest to our customers so that we can refine and continuously improve the Mobile App.
- if you use a the TTMC Mobile App's "find hotels" feature using your "current location," we use information about your current location – provided by your mobile device using GPS or similar technologies – to show nearby facilities. We do not collect location data unless you consent to this by expressly clicking on the "find hotels" feature using "current location" as your destination or you switch on location data collection through your phone settings menu. If you agree to share location information with us through your app or device settings, we may use and share this location information to offer you localised hotel or transportation options, or to provide you with other relevant information or services.
- each TTMC Mobile App will also send us error reporting information in the event that it crashes or hangs. This enables us to investigate the error and to improve the stability of the TTMC Mobile App for future releases. As part of these error reports, the TTMC Mobile App sends us information about the mobile device type and version, your customer ID, the time the error occurred, the feature being used and the state of the application when the error occurred. We do not use this

information for any purpose other than investigating and remedying the error.

- we may send push notifications concerning changes in flight status or other items coming up on your trips. In addition, we may also use push notifications to issue key communications from your travel manager/employer in case of emergency. These permissions can always be managed from your mobile device settings.

Original and updated purposes for processing:

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

International Transfer of personal information:

TTMC stores and processes personal information about Travellers in secure environments in the United States and other countries. In relation to the processing of non-U.S. Traveller data, in order to provide its services, TTMC must transfer your personal information to its affiliates

and/or service providers for processing in the U.S. and potentially other countries outside of your country of residence, whose data protection laws may be different to the laws in your country. TTMC will ensure that your information is protected in accordance with this Privacy Policy and the requirements of applicable data protection law wherever it is processed. We may share your personal information with third-parties outside the borders of the Republic of South Africa in order to supply you with any of the Services you require. This may involve transferring and processing your data outside of South Africa.

Where you require us to provide travel arrangements outside the borders of South Africa, we cannot guarantee the integrity of the privacy policies or laws applicable in the country in which the Services are to be provided to you. Accordingly, we cannot accept any responsibility for the processing of personal information in countries where there is no similar degree of protection afforded in the processing of personal information.

How we treat your personal information and data security:

We will ensure that all of our employees, third-party service providers, divisions and partners (including their employees and third-party service providers) having access to your personal information are bound by

appropriate and legally binding confidentiality obligations and process your personal information at standards equal to or higher than TTMC's in relation to your personal information.

We will:

- treat your personal information as strictly confidential, save where we are entitled to share it as set out in this Policy;
- take appropriate technical, security and organisational measures to ensure that your personal information is kept secure and is protected against unauthorised or unlawful processing, accidental loss, destruction or damage, alteration, disclosure or access;
- provide you with reasonable access to your personal information to view and/or update personal details;
- notify you if we become aware of any unauthorised use, disclosure or processing of your personal information; and
- upon your request, promptly correct, transfer, return or destroy any and all of your personal information in our possession or control, save for that which we are legally obliged or entitled to retain.

We will not retain your personal information longer than the period for which it was originally needed, unless we are required by law to do so, or you consent to us retaining such information for a longer period. In some circumstances, other applicable

laws require us to retain your data beyond your request for its deletion, or beyond your direct engagement with TTMC. As such, we may retain your personal information in adherence with other applicable legislation, notwithstanding your application to have it deleted or amended.

Whilst we will do all things reasonably necessary to protect your rights of privacy, we cannot guarantee or accept any liability whatsoever for unauthorised or unlawful disclosures of your personal information, whilst in our possession, made by third- parties who are not subject to our control, unless such disclosure is as a result of our gross negligence or fraud.

If you disclose your personal information to a third-party, such as an entity which operates a website linked to our website or anyone other than TTMC, TTMC shall not be liable for any loss or damage, howsoever arising, suffered by you as a result of the disclosure of such information to the third-party, including another user. This is because we do not regulate nor control how that third-party uses your personal information. You should always ensure that you read the privacy policy of any third-party.

We are committed to implementing the necessary measures to keep your data secure, where we have implemented current industry-setting standards to keep your data secure.

Customer rights and obligations:

A customer is entitled to request access to any relevant personal information held by TTMC and where such access is necessary for you to exercise and/or protect any customer's rights. For any personal information

held by any third-party responsible party, the customer must approach that responsible party for the realisation of the customer's personal information rights with them, and not with TTMC.

Under POPIA, you have rights in relation to your personal information. Please contact us to find out more about, or manifest, these rights:

- have your data processed in a fair, lawful and transparent way;
- be informed about how your personal information is being used, an example being this Policy;
- access personal information we hold about you;
- require us to correct any mistakes in your personal information;
- require us to delete personal information concerning you in certain situations where there is no good reason for us to continue to process it;
- request that we transfer your personal information to you or another service provider in a simple, structured format;
- object at any time to processing of your personal information for direct marketing purposes;
- object to automated decision making which produces legal effects concerning you or similarly significantly affects you;
- object in certain other situations to our continued processing of

your personal information;
and/or

- otherwise restrict or temporarily stop our processing of your personal information in certain circumstances.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights).

However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We will endeavour to respond to all legitimate requests within 10 (ten) business days. Occasionally, it may take us longer if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Users with citizenships from jurisdictions other than of South Africa, please note that TTMC complies with all South African data protection laws when processing your personal information pursuant to the Services as we are a South African entity operating in the South African market. Should foreign law be applicable in any regard to your use of the Services in any way, including how we may

process your personal information, please contact TTMC at [EMAIL] and we will gladly engage you on its application and your rights.

Users acknowledge that any content provided by users on our website, including via a messaging system, enters an open, public forum, and is not confidential, where the author of which will be liable for that content, and not TTMC.

Users understand that there are risks involved in sharing personal information. By disclosing personal information such as the user's name and email address, users acknowledge and understand that this information may be collected and used by an authorised third-party to communicate with you.

By accepting this Policy, you have opted-in to receive emails from TTMC, where your email address will be used to contact you from time to time and may also use it for security reasons to confirm your identity.

You have the right to opt-out of receiving email communication by following the directions posted on every email communication and asking to not be contacted.

TTMC's rights relating to personal information:

TTMC will disclose the user's personally identifiable information if it reasonably believes that it is required to do so by law, regulation or other government authority or to protect the rights and property of TTMC, its affiliate, third-party suppliers or the public. TTMC may also co-operate with law enforcement in any official investigation and may disclose the user's personally identifiable

information to the relevant agency or authority in doing so.

Circumstances may arise where, whether for strategic or other business reasons, TTMC decides to sell, buy, merge or otherwise reorganize its business. Such a transaction may involve the disclosure of personal information to prospective or actual purchasers, or the receipt of it from sellers. It is TTMC's practice to seek reasonable protection for information in these types of transactions and notify you prior to any disclosure of personal information. Such disclosure will also be subject to this Policy.

TTMC strives to keep the user's personal information accurately recorded. TTMC provides a user with the reasonable ability to review and correct it or ask for anonymization, blockage, transfer or deletion, as applicable.

We also collect, use and share aggregated data or de-identified data such as statistical or demographic data for any purpose. Such de-identified or aggregated data may be derived from your personal information but is not considered personal information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this Privacy Policy.

Request to close account:

You can close your TTMC account by contacting us as described below. Once you close an account, you will not be able to sign in or access any information associated with the account, but you can open a new account at any time. We will send you an e-mail confirming your account closure to the e-mail address contained in your profile.

Feedback:

If you have any questions or complaints about this Privacy Policy or any part of our service, please contact us by e-mailing [[EMAIL](#)].

If you have a complaint about our use of your information, please contact us directly so that we can address your complaint.

Cookies provisions:

Our website may make use of “cookies” to automatically collect information and data through the standard operation of the Internet servers. Cookies are small text files a website can use (and which we may use) to recognise repeat users, facilitate the user’s on-going access to and use of a website and allow a website to track usage behaviour and compile aggregate data that will allow the website operator to improve the functionality of the website and its content, and to display more focused advertising to a user by way of third party tools.

The type of information collected by cookies is not used to personally identify you. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to

deny or accept the cookie feature. Please note that cookies may be necessary to provide you with certain features available on our Website, and thus if you disable the cookies on your browser you may not be able to use those features, and your access to our Website will therefore be limited. If you do not disable “cookies”, you are deemed to consent to our use of any personal information collected using those cookies, subject to the provisions of this Policy and the Website’s other policies.

TTMC automatically collects certain information about your computer when you visit our website. For example, we collect information about your IP address, operating system, and web browser software (such as Firefox, Safari, Edge or Internet Explorer). We also may collect information about your online activity, such as trips viewed and travel booked. Our goals in collecting this automatic information include customising your user experience, increasing convenience as you use our website, and collecting analytics information in order to continually improve our website. We may use cookies to help us recognise your browser as a previous visitor and save and remember any preferences that may have been set while your browser was visiting our site. We also may record your password in a cookie if you checked the box titled “Remember my password on this computer”. Please note that IDs, passwords, and any other account-related data included in such cookies are encrypted for security purposes. TTMC will never store sensitive personal information, such as credit card numbers, in a cookie.

Our website may also use Web beacons (also known as clear gifs, pixel tags or Web bugs), which are tiny

graphics with a unique identifier, similar in function to cookies, that are placed in the code of a Web page. We use Web beacons to monitor the traffic patterns of users from one page within our sites to another, to deliver or communicate with cookies, to understand whether you have come to our website from an online advertisement displayed on a third-party website and to improve website performance. We also may allow our service providers to use Web beacons to help us understand which emails have been opened by recipients and to track the visitor traffic and actions on our website. This helps us measure the effectiveness of our content and other offerings for a better customer experience.

Notification of Changes:

We are continually improving our ways of work and our existing Services. We regularly review and, if appropriate, update our Privacy Policy from time to time, and as our services and use of personal data evolves. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices may also change from time to time. If and when our data protection practices change, we will update this Privacy Policy to describe our new practices.

If we want to make use of your personal data in a way that we have not previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

We will update the version number and date of this document each time it is changed.

For more information regarding your personal information lawfully stored or used by TTMC in rendering the Services, please contact [**EMAIL**] who will gladly assist.

This Policy (version 1.1) was last updated on 6 July 2022.

This Policy is compiled in accordance with the requirements of the Protection of Personal Information Act, No. 4 of 2013 (“POPIA”), as amended.