

PRIVACY STATEMENT

The Mastercard Travel & Lifestyle Services program (the “Program”), including the Program website (the “Site”) is provided by Ten Lifestyle Group Plc (“Ten”). No travel bookings are being made by Mastercard International Incorporated or its affiliates (“Mastercard”), nor is Mastercard acting as a travel agency or providing any travel consultation or advice, in connection with the Program.

Ten is committed to protecting your privacy. This Privacy Statement explains how and for what purposes we use the information collected about you via this Program. This Privacy Statement applies to users of the Program and any of the services made available through this Site, including offers from local travel agencies, suppliers of air, hotel, car and other travel-related products and services (“Suppliers”).

If you do not agree to the collection and use of your information as described in this Privacy Statement, you will not be able to use the Site or Program.

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1. INTRODUCTION.

- This Privacy Statement describes our data collection, use and sharing practices so that we can provide our Program to you, allow Suppliers to provide Services to you, run our business, further develop the most popular elements of the Service, contact you and comply with the law.
- We may act as data controller in relation to the Program and:
 - where you have requested Services from a Supplier, we may disclose your information to such Supplier(s) who will process your data for their own purposes as data controllers in relation to providing the Services to you;
 - where you have accessed the Program via your issuing bank, we may disclose your information to Mastercard or the issuing bank and those organizations may process your data for their own purposes as data controllers in relation to the provision of the Program, for example, to allow individuals within those organizations to understand your level of engagement with the service, to recommend things that may be of interest to you, or arrange Services on behalf of you; and
 - in certain instances, the Supplier, Mastercard and the issuing bank will act as a data controller for the limited purposes described in the “How We May Share Your Personal Data” section below..

2. HOW WE COLLECT YOUR PERSONAL DATA

- We may collect and process the following information in accordance with applicable data protection laws:
 - your contact information, such as name, email address, and phone number, provided by you if you register as a Member to use Mastercard Travel & Lifestyle Services;
 - any information you provide to us, including when you contact us via the online form submission or via email with an enquiry, when you use the Site or Program, through any telephone conversation with our representatives, or in response to a communication from us, we may be provided with certain personal data such as name, email address and information contained in the correspondence (which could tell us something about the individual's preferences). The individual contacting us is in control of the personal data and other information that they share with us. We need this information to be able to respond to the enquiry and to administer the program.
 - details of registration, preferences, and travel or transactions you carry out in relation to the program, including but not limited to name, order information, billing information, address, hashed payment details, including whether payments have been accepted or declined. We need this information to be able to deliver the Program; and
 - information provided when individuals visit our Site. We capture access data such as IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, date and time of the access, requests made, the amount of data transmitted and the requesting provider. This information does not allow us to identify you. We may also capture other information about visits to our Site such as site usage and traffic patterns. Whereas we may be able to identify an individual device and therefore an individual from this information, the purpose of collecting information is to administer, maintain and improve our Site and not to analyse individual visits to our Site (please see the ["How We May Use Your Personal Data"](#) section below for further details). Please be aware that we do not respond to Do Not Track signals on the site.
- Where you provide us with information about other people, you confirm that you have the authority to pass this information to us.
- We are required to comply with certain legal and regulatory requirements, and may process your personal data for compliance with such legal or regulatory obligations, to which we or regulators or law enforcement agencies are subject.
- Note that if any of your personal details change during your use of our Site, you are responsible for updating them by accessing the relevant section of our Site, or by contacting us as set out below.

3. HOW WE MAY USE YOUR PERSONAL DATA

Any personal data we process will be used in accordance with applicable data protection laws. We have described below our purposes for processing personal data.

- We may use information you give us or that we collect from you:
 - to provide the Service, allow Suppliers to provide Services to you, administer membership accounts and run our organization. We have a legitimate interest to process the personal data of our Members in order to provide the Service

and allow Suppliers to provide Services to you, administer membership accounts and run our organization.

- to inform individuals about changes to our Program, promotions and Services available: we may use personal data to inform individuals of information, promotions, suggestions, recommendations, products and services that may be of interest where they are similar to those that you have already purchased or inquired about (unless you opt-out) or which may be of interest based on the learnings from other similar groups of customers with similar preferences and behaviour, we are legally permitted to do so or where an individual has consented to receiving direct marketing from us (or an organization similar to us). Individuals may be contacted by post, email, telephone or such other means as we regard as appropriate and as legally permitted we have a legitimate interest to process the personal data of our Members for direct marketing purposes to provide the Program and allow Suppliers to offer Services to the individual and to run our business and rely on consent from the Member as a basis for direct marketing where we are legally required to do so; and we will only contact you by e-mail with information about products and services similar to those which you have previously shown an interest in or which there is a strong likelihood that you will be interested in
- to communicate with you. We have a legitimate interest to process this personal data in order to respond to enquiries, requests, complaints or comments that users submit to us;
- to administer, maintain and improve our Site:
 - we use “cookies” to monitor site user traffic patterns and site usage. This helps us to understand how our Members and potential Members use our Site so that we can develop and improve the design, layout and functionality of our Site. Cookies make it easier for you to log on to and use the Site during future visits. A cookie is a piece of information that is stored on your computer’s hard drive and which records your navigation of a website so that, when you revisit that website, it can present tailored options to you based upon the stored information about your last visit. You can normally alter the settings of your browser to prevent acceptance of cookies. If you do not want us to deploy cookies in your browser, you can set your browser to reject cookies or to notify you when a website tries to put a cookie on your computer. However, rejecting cookies may affect your ability to use some of the products and/or services at our Site. You can also choose to disable Cookies on the site by changing your preferences in the Cookie pop up banner at the bottom of your browser the first time you login to the Site. For more information about what cookies are and how they work, visit: <http://www.allaboutcookies.org>; and
- to notify you about functionality changes to our Program or the Site, or changes to our [Terms and Conditions](#). This processing is necessary for the performance of our contract with you;
- to invite you to participate in surveys and/or provide feedback about your use of our Program or the Site. Your survey responses will be used for quality management and product improvement purposes. In some circumstances, if you requested to be contacted in connection with a survey, Ten or Mastercard may follow up with you about your survey feedback.
- for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. We have a legitimate interest to process the personal data of our users for our internal operations;

- to allow you to participate in interactive features of our Program. This processing is necessary for the performance of our contract with you;
- to enforce our [Terms and Conditions](#);
- in other ways for which we provide specific notice (and obtain consent as may be required by law) at the time of such collection and/or use;
- as part of our security efforts. We have a legitimate interest to process the personal data of our users to keep our Site and Program safe and secure; and
- to comply with any legal or regulatory obligations to which we or regulators or law enforcement agencies are subject. This processing is necessary for compliance with a legal obligation to which we, our users or the regulator/law enforcement agency are subject.
- If you have any questions about how we use your data, you may email us at: mastercard.en-us@tengroup.com; or write to us at:

Privacy Team
 Ten Lifestyle Group Plc
 25 Broadway, Suite 10073
 New York, NY 10004
 USA

4. HOW WE MAY SHARE YOUR PERSONAL DATA

- We may share your information with selected third parties including:
 - Suppliers and other third parties for the performance of any contract you enter into with them or otherwise required to provide the Program to you;
 - Suppliers, Mastercard and the issuing bank and other third parties for the provision of the Program or your membership, for example, to allow registered individuals within these organizations to understand your level of engagement with the Program, to recommend things that may be of interest to you, or arrange Services on your behalf and other Members from your organization;
 - Ten may also disclose certain personal data with Mastercard and Mastercard may act as a data controller with respect to such data, in order for Mastercard to use the data for business purposes such as quality management and product improvement and development purposes, to provide reports to your issuing bank about your use of the Program, and to generate aggregated and anonymized reports, and insights to third parties such as financial institutions. If you have signed up to receive email marketing communications from Mastercard, Mastercard may send you email marketing communications about products, offers, or services, including materials based on your use of the Program. If you reside in Europe, Mastercard Europe SA is the data controller for the processing of your personal data to send such email communications. You can at any time unsubscribe from receiving such communications from Mastercard by clicking on the unsubscribe link within the marketing e-mails. For more information on Mastercard's privacy practices, please see [Mastercard's Global Privacy Notice](#).
 - Mastercard, our affiliates, financial institutions that issue payment cards or process payment card transactions, entities that assist with payment card fraud prevention, and merchants who accept payment cards to perform payment card transactions and other actions you request through the Program, including reserving and booking travel related services. For example, we provide financial institutions with information about cardholder

transactions that Mastercard processes. We also may share aggregated, anonymized information with participating financial institutions and their customers. For example, we may share this information to show trends about the general use of the Program;

- service providers such as support service providers, survey providers and similar third parties to be able to operate and facilitate our Program and systems.
- We may also disclose your personal information to third parties:
 - in the event that we sell any part of our business, in which case we may disclose your personal data to the prospective buyer of that part of our business to the extent that such disclosure is directly relevant to the sale; and
 - if we are under a duty to or permitted to disclose or share your personal data in order to comply with any legal or regulatory obligations, or in order to enforce or apply this Privacy Statement and other agreements; or to allow a Supplier to enforce or apply its contract with you. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. DATA TRANSFERS

- We may transfer or disclose personal data to recipients in countries outside of your country, including the United States. These countries may not have the same data protection laws as the country where you initially provided the information. When we transfer or disclose your information, we will protect that information as described in this Privacy Statement
- Where we transfer your personal data outside of the country in which you are based, we will rely on appropriate safeguards to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses adopted by the European Commission, or where applicable, relying on a Privacy Shield certification where the transfer concerns a US entity.

6. HOW WE PROTECT YOUR PERSONAL DATA

- We take appropriate measures to ensure that any personal data is kept secure. We will store your personal data for the duration of your use of our Program.
- If you delete your account, we will continue to store your personal data for a period of time in line with legal, regulatory, financial and business requirements. We also keep a record of correspondence in line with legal, regulatory, financial and business requirements.

7. YOUR RIGHTS AND CHOICES

- As a result of us collecting and processing your information, you have the following legal rights:
 - to access personal data held about you;
 - to request us to make any changes to your personal data if it is inaccurate or incomplete;
 - to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances;

- to receive your personal data provided to us as a data controller in a usable way in certain circumstances;
- to object to, or restrict, our processing of your personal data in certain circumstances;
- to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you;
- where our processing of your personal data is based on your consent you have the right to withdraw consent at any time by contacting us; and
- to lodge a complaint with a data protection supervisory authority.

8. FEATURES AND LINKS TO OTHER WEBSITES

- In the course of using the Program and our Site, you may choose to use certain features provided by our Suppliers or other entities, or click on links to other websites for your convenience and information. These features, which may include but are not limited to social networking and geographic location tools, and other websites, may operate independently from Ten. They may have their own privacy notices or policies, which we strongly suggest you review. To the extent any features or linked websites you visit are not owned or operated by Ten, we are not responsible for the sites' content, any use of the sites, or the privacy practices of the sites.

9. HOW TO CONTACT US

- To exercise any of your rights as set out above, you may email us at: mastercard.en-us@tengroup.com; or write to us at:

Privacy Team
 Ten Lifestyle Group Plc
 25 Broadway, Suite 10073
 New York, NY 10004
 USA