



PRIVACY NOTICE

Thank you for choosing to be part of our community at easy to travel (hereinafter as "Company", "we", "us", "our"). We are committed to protecting your personal data and your right to privacy. If you have any questions or concerns about this privacy notice or our practices with respect to your personal data, please contact us at support@easyto.travel

This privacy notice describes how we may use your information if you:

- download and use ETT Platform
- interact with us through our website <http://easyto.travel>

The purpose of this privacy notice is to explain to you as clearly as possible what information we collect, how we use it, and what rights you have with respect to it. If there are any terms in this privacy notice and/or ETTPP with which you do not agree, stop using ETT Platform and /or website <http://easyto.travel> immediately.

PLEASE READ THIS PRIVACY NOTICE AND THE ATTACHED EASY TO TRAVEL PRIVACY POLICY (ETTPP) CAREFULLY AS IT WILL HELP YOU UNDERSTAND WHAT WE DO WITH THE DATA WE COLLECT.

EASY TO TRAVEL PRIVACY POLICY (ETTPP)

We are ETT SOLUTIONS DMCC, doing business as **easy to travel** (hereinafter as "Company", "we", "us", "our"), a company registered in United Arab Emirates, Office 1701 Prime Tower, Business Bay, Dubai. We are operating the website <https://www.easyto.travel/>, Web services, including API and the mobile application easy to travel (hereinafter as "App" or "ETT App"), as well as any other related products and online cloud services that refer or link to the easy to travel privacy policy (hereinafter as "ETTPP") (collectively as "online cloud service" or "ETT Platform").

Account means the part of ETT Platform available to the authorized User, with individual access to detail and history of orders, to obtain additional information about the Airport Facilities, unique offers, and discounts for which the User has issued/accepted an order, or to change their contact information. Creating an Account is a prerequisite for registering with the ETT Platform and accessing certain Airport Facilities offered on ETT Platform.

Applicable Data Protection Law - means all applicable worldwide legislation and regulation relating to data protection and privacy including without limitation UK and the GDPR, the CCPA, the UAE DPP, etc.

Airport Facilities refer to various airport services (e.g., VIP lounge, VIP terminal, business lounge and similar Airport Services) or any other services provided by Service Providers, which you can book using ETT Platform.

Booking means transaction to order and purchase an Airport Facilities on the ETT Platform.

Cookie means a small piece of data (text files) containing letters and numbers sent by a web server to your computer, smartphone, tablet, or other Internet-enabled device used to consume ETT Platform.

Cookie Notice means a document explaining to data subject what Cookies is collect how ETT Platform will process it (Page 10)

Controller means a person(s) or company who decides how Personal Data will be processed.

Content means images and other data provided to the User, which may include text, audio, video, graphics, photographs, illustrations and/or similar materials, including trade names, logos, trademarks, and related copyrights.

Customer or User (You and/or Your) the person(s) (passenger(s)) who purchase Airport Facilities bookable on ETT Platform through b2b / b2c online services, ETT App or in physical office.

Data Processor means third parties that collects and processes Personal Data on behalf of a Controller. We undertake activity as both a Controller, and a Processor.

ETT Platform is an online b2b/b2c booking system developed for the interaction of market participants in the tourism industry, integrated by a single ecosystem, for consolidation, management and distribution of travel content through API, Web services, ETT App and web site (<https://www.easyto.travel/>)

ETT App means the mobile application that provides Users access to online cloud services for searching, Booking, and purchasing Airport Facilities through mobile devices.

Passenger means the traveler, person, or group of people to whom the Airport Facilities are delivered.

Payment card means an identification card that allows the cardholder (cardholder) to make a payment by electronic funds transfer. It is used to pay for goods and services, including via the Internet, using contactless transfer technology, as well as to withdraw cash.

Personal Data - Information relating to an identifiable person, who can be directly or indirectly identified by reference to an identifier.

Services means online cloud services on ETT Platform which allows the User to purchase Airport Facilities.

Service Provider(s) – an Airport Facilities provider(s).

Signup or Authorization means voluntary procedure when the visitor of ETT Platform fills the form for User Account generation, uniquely identified by pair login (user ID) and password.

Social media means a digital technology that facilitates the sharing of text and multimedia through virtual networks and communities.

Social Media Account means an account registration with a social media platform, such as "Microsoft", "Apple", "Google", "Meta" and other available on ETT Platform and includes handle names.

Third party software means software and/or services of different vendors/licensors/subcontractors integrated into ETT Platform to support the functionality and improve our Services.

You can contact us by e-mail at support@easyto.travel, or by mail to Office 1701 Prime Tower, Business Bay Dubai UAE.

1. WHAT DATA WE COLLECT

1.1. Personal data you disclose to us

We collect personal data that you voluntarily provide to us when you sign up with ETT Platform, express interest in learning about us or our products and services, when you engage in activities with ETT Platform, or otherwise contact us.

The personal data we collect depends on the context of your interaction with us and ETT Platform, the choices you make, and the Services you use. The personal information we collect may include the following:

Personal data. We collect names; phone numbers; email address; mailing addresses; contact or authentication information (first name, last name etc.); billing addresses; and other similar information.

Payment Data. We may collect data necessary to process your payments if you make purchases, such as your Payment card number and the security code associated with your Payment card. All payment data is stored by Emirates Islamic Bank. You can find a link to their privacy notice here: <https://www.emiratesislamic.ae/en>

Social Media Account information. We may enable you to sign up with us using your existing Social Media Account information, such as "Microsoft", "Apple", "Google", "Meta" and other methods available on ETT Platform. If you choose to sign up in this way, we will collect the information described in Section **"WHAT WE DO WITH YOUR LOGINS FROM SOCIAL MEDIA ACCOUNTS"**

All personal data you provide to us must be truthful, complete, and accurate, and you must notify us of any changes to such personal data.

1.2. Automatically Collected Data

Some data, such as your IP address and/or browser and device characteristics, is collected automatically when you use ETT Platform.

We automatically collect certain data when you use ETT Platform. This data does not reveal your specific identity (such as your name or contact information), but may include information about your device, such as your IP address, browser and device features, operating system, language settings, referring URLs, device name, country, location, and information about how and when you use ETT Platform. This information is primarily required for the security and operation of ETT Platform and for our internal analytics and reporting.

Like many corporations, we also collect data using cookies and similar technologies. You can learn more about this in our Cookie notice on page 10.

The data we collect covers:

Log and Usage Data. Log and usage data is data about services, diagnostics, usage, and performance that our servers automatically collect when you access or ETT Platform, which we record in log files. Depending on how you interact with us, this log data may include your IP address, device information, browser type and settings, and information about your activity on ETT Platform (such as date and time stamps associated with your use, pages and files viewed, searches and other actions you take, such as which features you use), information about device

events (such as system activity, error reports (sometimes called "crash dumps"), and hardware settings).

Device Data. We collect device data such as information about your computer, phone, tablet, or other device that you use to access ETT Platform. Depending on the device you use, this data may include information such as your IP address (or proxy server), device and app ID numbers, location, browser type, and hardware model. Your Internet service provider and/or service provider, operating system, and system configuration.

Location data. We collect location data, such as location information about your device, which may or may not be accurate. The scope of the data we collect depends on the type and settings of the device you use to access ETT Platform. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You may choose not to collect this data by denying access to it or by disabling the location setting on your device. Please note, however, that if you choose to opt out, you will not be able to use certain features of our Services.

1.3. Data collected through the ETT App

If you use the ETT App, we also collect the following data:

Geolocation Information. We may always request access or permission and track location data from your device or while you are using ETT Platform to provide certain location-based services. If you want to change our access or permissions, you can do so in your device settings.

Access from devices. We can request access or permission for certain features from your device, including Bluetooth, calendar, camera, contacts, microphone, reminders, sensors, text messages, Social Media Accounts, storage space, and others. If you want to change our access or permissions, you can do so in your device settings.

Device Data. We automatically collect device information (such as your device ID, model, and manufacturer), operating system, version information and system configuration information, device and application ID numbers, browser type and version, hardware model, Internet service provider and/or mobile carrier, and IP address (or proxy server), among others.

Push notifications. We may request to send push notifications regarding your Account or certain ETT Platform features. If you wish to opt out of receiving such messages, you can turn them off in your device settings.

All the above data is primarily required for the security and operation of ETT Platform, for troubleshooting purposes, and for the purposes of our internal analytics and reporting.

1.4. Data collected from other sources

To enhance our ability to provide you with relevant Content, offers, services, and updates, we may receive information about you from other sources, such as publicly available databases, Service Providers, data providers, online platforms, social media, and other third parties. This information includes mailing addresses, job titles, email addresses, phone numbers, intentions (or user behavior data), Internet Protocol (IP) addresses, Social Media Accounts, social media URLs and user profiles for purposes of targeted advertising and event promotion. If you interact with us through an online platform and/or Social media using your account we receive personal data about you, such as your name, email address and gender. Any personal information we collect from your Social Media Account is subject to the privacy settings of your Social Media Account.

2. HOW WE USE YOUR DATA

We use Personal data collected through ETT Platform for various business purposes described below. We process your Personal data for these purposes in accordance with our legitimate business interests with your consent and/or to comply with our legal obligations. We indicate the specific grounds for processing that we rely on next to each purpose listed below.

We use the data we collect or receive:

To facilitate the process of creating an Account and logging into ETT Platform. If you choose to link your Account with us to a third party account (such as your Google or Microsoft

account), we will use the information you allow us to collect from those third parties to facilitate the process of creating an Account and logging into ETT Platform. See section below “WHAT WE DO WITH YOUR LOGINS FROM SOCIAL MEDIA ACCOUNTS”

Posting reviews and feedback. We post reviews and feedback on ETT Platform which may contain Personal data. We will obtain your consent to use your name and the content of the review before posting the review or feedback. If you would like to update or delete your review or feedback, please contact us at support@easyto.travel and be sure to include your name, location, and contact information.

Requesting Feedback. We may use your data to request feedback and contact you about your use of ETT Platform.

To provide communication between Users. We may use your data to provide communications between Users with each User's consent.

To manage User Accounts. We may use your data to manage and maintain your Account.

Checkout, fulfillment, and management of orders. We may use your data to process, fulfill, and manage your orders, payments, refunds, and other activities performed at ETT Platform.

Arranging giveaways and contests (events). We may use your data to conduct giveaways and contests when you choose to participate in our events.

To facilitate the provision of Services to the User. We may use your information to provide you with an Online cloud service.

To respond to User requests / offer support to Users. We may use your data to respond to your requests and address any potential problems you may encounter when using ETT Platform.

To send you marketing and promotional messages. We and/or our Service Providers may use the personal data you send us for our marketing purposes if it is consistent with your marketing preferences. For example, when you express an interest in receiving information about us or ETT Platform by subscribing to a marketing newsletter or otherwise contacting us, we will collect Personal data from you. You can opt out of receiving our marketing emails at any time (see section “WHAT PRIVACY RIGHTS DO YOU HAVE”).

Providing you with targeted advertising. We may use your data to develop and display personalized Content and advertising (and work with third parties who do so) tailored to your interests and/or location, and to measure their effectiveness. For more information, see our Cookie notice on page 10.

For other business purposes. We may use your data for other business purposes, such as analyzing data, determining usage trends, determining the effectiveness of our advertising campaigns, and evaluating and improving ETT Platform, the software, marketing, and your experience. We may use and store this information in an aggregated and anonymous form so that it is not linked to individual Users and does not include Personal data. We will not use identifiable Personal data without your consent.

3. WHETHER YOUR DATA WILL BE SHARED WITH ANYONE

We only share data with your consent to comply with laws, provide you with services, protect your rights or fulfill our obligations.

We may process or transfer your data that we hold on to the following legal grounds:

Consent. We may process your information if you have given us consent to use your Personal data for a specific purpose.

Legitimate Interests. We may process your data when reasonably necessary to further our legitimate business interests.

Compliance with b2b and/or b2c terms. We may process your personal information to comply with the b2b and/or b2c terms and conditions.

Legal Commitments. We may disclose your data where legally required to do so to comply with Applicable Data Protection Law, in response to requests from public authorities, in litigation or legal proceedings, including in response to requests from public authorities to comply with national security or law enforcement requirements.

Critical interests. We may disclose your data if we believe it is necessary to investigate, prevent or act regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activity, or as evidence in a lawsuit in which we are involved. Specifically, we may need to process your data or share your Personal data in the following instances:

Business Transfers. We may share or transfer your data in connection with or during negotiations of any merger, sale of corporate assets, financing or acquisition of all or part of our business by another corporation.

API. We may share your data with certain APIs of Third party software, such as, e.g. the Google Maps API (Google Maps API, Place API). To learn more about Google's Privacy Policy, go to this link <https://policies.google.com/privacy>. We receive and store information about your location on your device ("cache"). You can withdraw your consent at any time by contacting us at the contact information listed at the end of this document.

Service Providers, Vendors, Consultants and other third party vendors, subcontractors, licensors. We may share your data with Service Providers, third party vendors, service providers, subcontractors, Agents, or licensors who perform services for us or on our behalf and require access to such information to perform that work. Examples include payment processing, data analytics, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology within ETT Platform, which will allow them to collect data on our behalf about how you interact with ETT Platform. This information may be used, among other things, to analyze and track data, to determine the popularity of certain Content, pages, or features, and to better understand online activity. Except as described in this notice, we do not share, sell, rent, or trade your data with third parties for promotional purposes. We have contracts with our Data Processors and Controller that are designed to help protect your Personal data. This means that they cannot do anything with your Personal data unless we instruct them to do so. They will also not share your personal data with any organization other than us. They also agree to protect the data they keep on our behalf and to keep it for a period that we specify.

Affiliates. We may share your data with our affiliates, in which case we will require those affiliates to comply with this ETTTP. Affiliates include our parent company and any subsidiaries or other companies that we control or that are under common control with us.

Business Partners. We may share your data with our business partners to offer you certain services or promotions.

Users. When you share Personal data (for example, by posting reviews on ETT Platform) or otherwise interact with the public and open part of ETT Platform, such personal information may be viewed by all Users and may be publicly available outside of ETT Platform in perpetuity.

4. TO WHOM YOUR DATA WILL BE TRANSMITTED

We share and disclose your data and information only to the following third parties:

- Cloud Computing Services
- Data Analytics Services
- Data storage service providers
- Financial and accounting tools
- Order fulfillment service providers
- Banks and Payment Systems
- Sales and marketing tools
- User account registration and authentication services
- Service Providers
- Airports

If we have processed your data based on your consent and you wish to withdraw your consent, please contact us using the contact information below.

5. WHETHER WE USE COOKIES OR OTHER TECHNOLOGIES

We may use cookies and similar tracking technologies (such as web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can opt out of certain cookies.

Cookies and similar technologies. Most web browsers accept cookies by default. If you prefer, you can usually set your browser to delete cookies and reject cookies. If you choose to delete cookies or reject cookies, certain ETT Platform features or services may be affected. To opt out of advertising based on advertisers' interests in ETT Platform, visit, for example, <http://www.aboutads.info/choices/>. For more information, see our Cookie notice on page 10.

6. WHAT WE DO WITH YOUR LOGINS FROM SOCIAL MEDIA

ETT Platform offers you the opportunity to register and log in to ETT Platform using your Social Media Account on third-party Service provider (Social Media Provider). If you choose to do so, we will receive certain information about your profile from your Social Media Provider. The profile information that we receive may vary depending on the Social Media Provider, but will often include your name, email address, friend list, profile picture, and other information that You choose to make publicly available on such Social media platform.

We will only use the information we receive for the purposes described in this ETTTPP or as otherwise explained to you by ETT Platform. Please note that we do not control and are not responsible for other uses of your Personal data by a Social Media Provider. We encourage you to review their privacy notice to understand how they collect, use, and share your Personal data, as well as how you can set your privacy settings on their websites and apps.

7. WHAT IS OUR STANDING ON THIRD PARTY ADVERTISEMENT

ETT Platform may contain advertisements from third parties that are not affiliated with us and that may link to other websites, online services, or mobile applications. We cannot guarantee the security and privacy of the data you provide to third parties. The ETTTPP does not apply to data collected by third parties. We are not responsible for the content or privacy and security policies or those of third parties, including other websites, services or applications that may be linked to ETT Platform. You should review the policies of such third parties and contact them directly to answer your questions. We are also not responsible for the security of any information you transmit to third party vendors that promote ETT Platform but are not affiliated with it.

8. HOW LONG WE KEEP YOUR DATA

We will only retain your Personal data for as long as necessary for the purposes set forth in the ETTTPP, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in the ETTTPP requires us to retain your personal information longer than the period that Users have an ETT Platform Account.

When we have no ongoing legitimate need to process your Personal data, we will either delete or encrypt and anonymize such information, or, if that is not possible (for example, because your personal data has been stored in backup archives), we will securely store your Personal data and isolate it from further processing until such time as it can be deleted.

9. HOW WE KEEP YOUR DATA SECURE

We are committed to protecting your Personal data through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect any information we process. However, despite our security measures and efforts to protect your data, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers, cyber criminals or other unauthorized third parties will not compromise our security and improperly collect, access, steal or alter your data. Although we will do our best to protect your Personal data. The transfer of Personal data to ETT Platform is entirely at your own risk. You should only access ETT Platform in a secure environment.

10. WHAT PRIVACY RIGHTS DO YOU HAVE

In some regions, such as the European Economic Area (EEA) and the United Kingdom (UK), you have rights that allow you to expand access to and control your Personal data. You can view, change, or close your Account at any time.

In some regions (such as the EEA and the United Kingdom), you have certain rights under Applicable Data Protection Law. These may include the right (i) to request access to and obtain a copy of your Personal data (information); (ii) to request correction or deletion; (iii) to restrict the processing of your Personal data (information); and (iv) if applicable, to transfer data. In certain circumstances, you may also have the right to object to the processing of your Personal data (information). To make such a request, use the contact information below. We will consider and respond to any request in accordance with Applicable Data Protection Law.

If we rely on your consent to process your Personal data, you have the right to withdraw your consent at any time. Please note, however, that this will not affect the lawfulness of the processing prior to revocation, nor will it affect the processing of your personal data carried out on lawful grounds of processing other than consent.

If you are a resident of the EEA or the UK and believe that we are processing your Personal data (information) illegally, you also have the right to complain to your local data protection supervisory authority. You can find their contact information here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you live in Switzerland, the contact details of the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

For example, if you use GDPR, you are generally entitled to the following rights: Right to rectification (Article 16); Right to erasure ("right to be forgotten") (Article 17); Right to restriction of processing (Article 18); Right to notification - obligation to notify in connection with the rectification or erasure of personal data or the restriction of processing (Article 19); Right to data portability (Article 20); Right to object (Article 21); Right not to be subject to a decision based solely on automated processing - including profiling (Article 22). If you believe that the processing of your data violates data protection law or your data protection rights have otherwise been violated in any way, you can contact the Federal Commissioner for Data Protection and Freedom of Information (BfDI) <https://gdpr-info.eu/>

Account Information. If you want to view or change information in your Account or close it at any time, you can login into your Account settings and update it.

Upon your request to terminate your Account, we will deactivate or delete your Account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, and/or comply with Applicable Data Protection Law.

Unsubscribe from email marketing. You may unsubscribe from our email newsletter at any time by clicking the unsubscribe link in the emails we send you or by contacting us using the contact information below. You will then be removed from the marketing mailing list, but we may still communicate with you, such as to send you emails related to services you need to administer and use your Account, to respond to requests for service, or for other non-marketing purposes. To opt out otherwise, you can login to your Account settings and update your preferences.

If you have questions or comments about your privacy rights, you can email us at support@easyto.travel

11. MANAGE NON-TRACKING CAPABILITIES

Most web browsers as well as some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting that you can activate to signal your privacy preferences so that data about your online activities is not tracked or collected. At this stage, a common technology standard for recognizing and implementing DNT signals has not yet been developed. Thus, we do not currently respond to DNT browser signals or any other mechanism that automatically reports your choice not to be tracked online. If an online tracking standard is adopted that we must follow in the future, we will inform you of such practices in a new version of the ETTPP.

12. DO WE MAKE UPDATES TO THE PRIVACY POLICY

We may update the ETTPP from time to time. An updated version will be marked with an updated date, and the updated version will take effect as soon as it becomes available.

We will mark the updating ETTPP by label the "Last updated". It is your responsibility to periodically review ETTPP to stay informed of updates. You will be subject to and will be deemed to have been made aware of and to have accepted, the changes in any revised ETTPP by your continued use of the ETT Platform after the date such revised ETTPP is posted.

13. HOW YOU CAN CHECK, UPDATE OR DELETE THE DATA WE COLLECT FROM YOU

Under Applicable Data Protection Law, you may have the right to request access to Personal data we receive from you, to modify that information, or to delete it under certain circumstances. To request to review, update or delete your personal data, please send a request to support@easyto.travel

14. HOW YOU CAN CONTACT US

If you have any questions or comments about the ETTPP you may contact our Data Protection Officer (DPO) at e-mail at ab@easyto.travel, or by mail to in United Arab Emirates Office 1701 Prime Tower, Business Bay, Dubai.

15. ETTPP EFFECTIVE VERSION

This effective version of the ETTPP shall enter into force on December 1, 2024

COOKIE NOTICE

A cookie is a small piece of data (text files) containing letters and numbers sent by a web server to your computer, smartphone, tablet, or other Internet-enabled device used to consume our services.

We use cookie technology to:

- (i) Understand and store user preferences for future visits.
- (ii) To keep track of advertisements.
- (iii) To collect aggregate data about visits and interactions with ETT Platform to offer better services in ETT Platform in the future.

ETT Platform use the following categories of cookies:

Mandatory cookies. These cookies are required to use ETT Platform. Without them you will not be able to use features such as remembering your username and password or saving Airport Facilities in your shopping basket.

Operational cookies. These cookies collect anonymous information about your actions on ETT Platform. For example, we use Google Analytics cookies to better understand how customers find and use ETT Platform and to further improve ETT Platform's navigation, shopping experience and marketing efforts. The data obtained through these cookies does not contain any personalized information by which your identity could be determined. You may refuse the use of cookies by changing your browser settings.

Functionality cookies. These cookies remember your preferences for country, language, and search options such as size, color, or product/service line to keep your use of ETT Platform simple and convenient. The information these cookies collect is anonymous and will not be shared with any Third party software. You have the right to refuse the use of cookies by changing your browser settings.

Targeting or advertising cookies. These cookies collect information about your online behavior and habits to provide you with advertisements that match your interests and needs. They are also used to limit the number of times that advertisements appear and to measure their effectiveness. These cookies are usually provided by third party advertising networks. They remember the sites you have visited and share this information with third parties such as advertising companies. You may opt out of these cookies by changing your browser settings.

Social cookies. These cookies allow you to share information on Social media. For more information about ETTTPP and use of cookies in this case, please visit Social Media Provider websites.

If you wish to delete all cookies from your computer or device, please contact your Internet browser support for further instructions. Information about deleting and controlling cookies is available at <https://www.aboutcookies.org/>. Please note that deleting cookies or refusing further use will result in the inability to use some ETT Platform services.

Please note that refusing to use cookies does not mean you will not continue to receive online advertisements. Refusing cookies means that the company or companies from whom you have withdrawn your consent to use cookies will provide you with non-personalized advertising. Therefore, you may receive even more advertisements that are not relevant to your interests and needs.