

Last Modified: November 12, 2020

Curated Planet, LLC ("Curated Planet") respects the privacy of users of our mobile and tablet applications (collectively, the "App") and recognizes your need for appropriate protection and management of the personally identifiable information you share with us. **If you do not agree to the policies discussed here, you should not download or use the App.**

This Privacy Policy sets forth Curated Planet's practices regarding the collection, use and disclosure of personally identifiable information or data that you may provide through the App ("Personal Information"). The terms "we", "us" and "our" refers to Curated Planet, and "you" and "your" refers to you, the user of the App. Please read this entire privacy policy before using the App or submitting information to Curated Planet through the App. By using the App or submitting information through the App to Curated Planet, you agree with the terms written below as well as the End User License Agreement ("EULA"), available at <https://legal.curatedplanet.com/terms-of-use-whitelabel.pdf>.

Privacy Policy

Data Collection: When using the App, we may collect the following information from you, some of which may be Personal Information.

- **Personal Information:** Curated Planet collects Personal Information when you voluntarily submit it to Curated Planet through the App. This will occur during the process to become a registered user ("Registered User"), when we will collect information including your name, telephone number, and email address. If you provide Personal Information of someone else through the App, you should obtain consent of such person before providing it through the App. We may also request additional information, such as travel preferences or booking confirmation details. You can choose not to provide this information, but in general certain information is required in order to ask us a question or initiate other transactions on the App. We also collect any information you may provide through our assistant chat service, survey responses, or email.
- **Information from other sources:** We may also periodically obtain personal and non-personal information about you from affiliated entities, business partners, and other independent third-party sources and add it to our account information. Examples of information include: booking confirmations or reservations, such as for a flight, hotel or restaurant.
- **Automatic Information:** This information may include IP address, carrier, wireframe records, operating system and settings, access times, data that identifies your device, or location. When you use the App, you can choose to allow access to your current location – provided by your mobile device using GPS or similar technologies – in order to identify nearby services. If you choose to allow access, this location data may be collected as part of

search requests logged by our servers. We may use your location information to process and personalize your requests. Such data is collected during the 72-hour period before and after an active tour. We may also use location information for internal support, to develop new features, to provide a better user experience, and to improve the overall quality of the App. You can switch off the App's access to your location at any time through your phone settings menu.

- **Special Categories of Personal Information:** We generally do not collect or require special categories of Personal Information (such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health information, biometric data, or sexual orientation) in order to access our App or utilize the services. In the event we may need to collect such information to provide a specific service to you, we will obtain your consent as required by law. In certain circumstances, subject to applicable law, we may process or otherwise disclose special categories of Personal Information without consent, such as to protect the vital interests of you or of another person.

Use of the Information Collected: The Information collected as described above will be used as set out in further detail below

- **For our legitimate Interests.** To operate our business and provide the user services, other than in performing our contractual obligations to you, for our "legitimate interests" for the purposes of applicable law, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data. Legitimate interests may include:
 - enable your travel experience with Tour Operators;
 - create or register an account with us;
 - provide details about your reservations;
 - to address and respond to your requests, inquiries, and complaints;
 - for fraud, loss, and other crime prevention purposes;
 - subscribe you to our marketing communications;
 - notify you of surveys available from Tour Operators;
 - to maintain the App and provide a connection to Tour Operators, including for technical support;
 - correspond regarding reservations using your phone number or email address;
 - to assist in the investigation of suspected illegal or wrongful activity, and to protect and defend our rights and property, or the rights or safety of third parties;
 - to enforce our EULA, this Privacy Notice, or agreements with third parties; or
 - Subject to applicable contractual or legal restrictions, in connection with a contemplated reorganization or an actual reorganization of our business, in connection with financing, a sale or other

transaction involving the disposal of all or part of our business or assets, including for the purpose of permitting the due diligence required to decide whether to proceed with a transaction.

- **For the performance of a contract.** To perform our contractual obligations to you, including to fulfil your request for services, to contact you in relation to any issues with our services, where we need to provide your Personal Information to our service providers, or to take steps in response to information or inquiries you may submit prior to entering into a contract or partnership with us.
- **To comply with legal obligations.** comply with laws, regulators, court orders or other legal obligations pursuant to legal process;
- **To protect data subjects' vital interests.** To protect the vital interests of you or another person.

This information may be used by Curated Planet personnel as a means to contact you to obtain more information, to improve the App, or to provide you with information that you have requested or additional information which Curated Planet believes may be of interest to you.

In some cases where we are not already authorized to process your Personal Information under applicable law, we may ask for your consent to process your Personal Information.

Sharing of the Information

Curated Planet may share your information with the following entities:

- **Tour Operators.** Tour Operators are the entities who provide certain travel services, including but not limited to reservations, tours, packages, travel insurance, excursions, cruises or other travel-related activities (collectively, "**Travel Services**"). By downloading the App, you are authorizing us to disclose to Tour Operators the information required to complete the booking and make any appropriate reservations. The Tour Operators are not controlled by Curated Planet and Personal Information disclosed to them is subject to the applicable Tour Operator's privacy policy and security practices. We encourage you to review the privacy policies of any Tour Operator whose Travel Services you purchase through the App.
- **Third Party Vendors.** Third Party Vendors are vendors who provide services or functions available on the App, including credit card processing, business analytics, customer service, or marketing. With the exception of Tour Operators, Third Party Vendors have access to and may collect information only as needed to perform their function and are not permitted to share or use the information for any other purpose. The information we provide to Third Party Vendors is protected by

confidentiality agreements and is to be used solely for the purpose(s) permitted by such agreements.

We may also disclose Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant, or other lawful request for information we receive, or as otherwise pursuant to legal process. We may also use and disclose Personal Information to establish or exercise our legal rights, to enforce our End User License Agreement, this Privacy Policy, or agreements with third parties, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

Subject to applicable law, Curated Planet reserves the right to sell or transfer Personal Information in the event that Curated Planet is acquired by or merged with another company or in connection with the potential sale or transfer of some or all of the business assets of the App or Curated Planet, including for the purpose of permitting the due diligence required to decide whether to proceed with a transaction. If the sale occurs, the purchaser will be entitled to use and disclose the Personal Information collected by us, and the purchaser will assume the rights and obligations regarding Personal Information as described in this Privacy Policy.

We may also share aggregate or anonymous information with third parties, including current and potential business partners. Such information will not contain Personal Information and will be used to develop products and services that enhance the App and benefit its users.

Storage of Personal Information: If you are a Registered User, we store your Personal Information locally in the App and on servers hosted by Amazon Web Services. You may access your information from the “My Account” section of our App (“Profile”). Profile contains your name, email address, and phone number. We may store other information you have elected to provide us, such as gender, disability status, activities, and lifestyle and other travel preferences.

Curated Planet also records copies of your correspondence with us (including emails and chat logs) and details of any transactions conducted through the App.

Curated Planet may maintain the data collected in an electronic database of voluntarily submitted Personal Information. Curated Planet and its agents may exchange such information with each other or with you over the Internet or intranet systems for the purposes of carrying out the activities described above.

While Curated Planet makes every reasonable effort to protect the information collected through the App, please be aware that there is always some risk involved when submitting data over the Internet. We cannot guarantee that the

App is 100% safe from illegal tampering or "hacking." Any data transmitted over the Internet may be at risk; however, once it is received at Curated Planet and entered into its database, it has the same protection that Curated Planet extends to its own confidential information.

Updating Your Information: If at any time you wish to stop receiving emails or other communications from us, or if you have submitted Personal Information through our App and would like to have that information deleted from our records, please notify us at support@curatedplanet.com. You may also request access to personal data about you that Curated Planet holds and you may have the opportunity to request a correction or amendment to your personal data by contacting us at support@curatedplanet.com.

De-Identified or Anonymous Data. We may create de-identified or anonymous data from Personal Information by removing data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you or through obfuscation or through other means. Our use of anonymized data is not subject to this Privacy Policy.

Links to Third Party Websites: As a convenience to our visitors, our App may contain links to the Curated Planet website and other non-Curated Planet websites that we believe may offer useful information. Those websites have their own privacy policies and the privacy policy presented here does not apply to those websites. You should contact these websites directly for information on their privacy policies, confidentiality agreements and data collection/distribution procedures.

Children's Policy: We are committed to protecting the privacy of children. Our App is not intended for or designed to be accessed by persons under the age of 18. As noted above, we do not collect Personal Information unless you provide it to us – including an individual's age.

Data Subject Rights. Data subjects in the European Economic Area and certain other jurisdictions may have certain rights under applicable data protection law, including the right to request confirmation from us as to whether or not we are processing your Personal Information. Where we are processing your Personal Information, subject to applicable law, you also have the right to:

- Request access to, modification or rectification, or deletion. You may have the right to request access to, modification of, or deletion of your Personal Information we maintain.
- Request restriction of processing. You may have the right to request that we restrict processing of your Personal Information in certain circumstances, such as where you believe that the Personal Information we hold about you is inaccurate or our processing is unlawful.

- Object to processing. In certain circumstances, you may have the right to request that we stop processing your Personal Information, such as a request to stop sending you direct marketing communications. To opt-out of direct marketing communications, please see the instructions in the “Withdrawing Your Consent” section of this Privacy Policy.
- Data portability. In certain circumstances, you may have the right to receive the Personal Information concerning you that you provided to us or to request that we transmit your Personal Information to another data controller.
- Lodge a Complaint. You have the right to lodge a complaint with a supervisory authority.

To exercise your rights, you may contact us as at support@curatedplanet.com. As permitted by law, certain data elements may not be subject to access, modification, portability, restriction, and/or deletion. Furthermore, where permissible, we may charge for this service. We will respond to reasonable requests as soon as practicable and as required by law. To protect your privacy and security, we may take steps to verify your identity in order to respond to your request.

Withdrawing your Consent. In most cases, we need to process certain of your Personal Information in order to fulfil our contractual obligations to you and for our legitimate interests. Where the basis of processing is legitimate interests, you have a right to object to the processing of your Personal Information. Please note that, subject to applicable law, we may continue to process your Personal Information even where you object if there are compelling legitimate grounds for processing that override your interests and rights, or where processing is necessary to establish, exercise, or defend legal claims.

Where consent is the basis of processing, you may at any time withdraw the consent you provided for the processing of your Personal Information for the purposes set forth in this Privacy Policy by contacting us at support@curatedplanet.com, provided that we are not required by applicable law or professional standards to retain such information.

If you would like to stop receiving newsletters or other marketing or promotional messages, notifications, or updates, you may do so by following the unsubscribe instructions that appear in these e-mail communications. Alternatively, you may contact us at support@curatedplanet.com to opt-out of direct marketing. Please be advised that you may not be able to opt-out of receiving certain service or transactional messages from us, including legal notices and certain communications related to the provision of the services.

Please note that if you do not provide consent, if you withdraw your consent or object to processing, or if you choose not to provide certain Personal Information, we may be unable to provide you some or all of the services.

Transfer of Data. Please note that if you are using the App from outside of the United States, your information may be transferred to, stored, and/or processed in this country. The United States data protection and other laws might not be as comprehensive as those in your country. If you are located outside of the United States, the transfer of Personal Information is necessary to provide you with the requested information and services and/or to perform any requested transaction. By using the App, you acknowledge and consent to the transfer of your information to our facilities in the United States.

Data Retention. We will retain your Personal Information for as long as is necessary to provide the services, or for such longer period as may be required or permitted by applicable law. We will also retain your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

California Privacy Rights. Under Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of personal information (as defined by California law) the business shares with third parties for those third parties' direct marketing purposes, and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To exercise your rights, you may make one request each year by emailing us at support@curatedplanet.com with "Request for California Privacy Information" in the subject line and in the body of your message. Be sure to provide in the request sufficient information to properly identify you and/or the members of your family.

Privacy Policy Updates: Curated Planet may, at any time, revise this privacy policy by updating this posting. Data will be handled in accordance with the policy in effect at the time the data is collected.

If you have any questions about this privacy statement, the practices of the App, or your dealings with the App, please contact our webmaster at support@curatedplanet.com.