

## California Consumer Privacy Act Notice

(Last updated: August 24, 2020)

This California Consumer Privacy Act Notice (“Notice”) is provided by TRAVDOCS, LLC, d/b/a Travel Industry Solutions described below. Referred to in this Notice as “we” or “us.”

This Notice explains how we collect, use, and disclose personal information about California residents. The Notice also explains certain rights that California residents have under the California Consumer Privacy Act (“CCPA”). This Notice explains how California residents can exercise their rights under the CCPA to request that we: (1) provide certain personal information that we have collected about them during the past 12 months, along with related information described below, or (2) delete certain personal information that we have collected from them.

The CCPA only applies to information about residents of California. If you are not a resident of California, you may submit a request and we will process it, as described in this Notice, even though the CCPA does not require us to do so. In accepting, processing, and responding to requests by individuals who are not California residents, we will apply all of the same limitations and exceptions under the CCPA to those requests as apply to requests made by California residents. We reserve the right to change or stop the practice of accepting requests from individuals who are not California residents at any time and without prior notice.

Under the CCPA, “personal information” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household. This information is referred to in this Notice as “Personal Data.”

### Categories of Personal Data that We Collect and Disclose

We collect and disclose Personal Data in a variety of contexts. For example, we collect and disclose Personal Data to provide individual and commercial financial products and services, and for our employment and human resource purposes.

The Personal Data that we collect, use, or disclose about a specific California resident will depend on, for example, our relationship or interaction with that individual. During the past 12 months, we have collected the following categories of Personal Data:

1. Personal unique identifiers, such as full name
2. Personal information, including contact details such as telephone number and address
3. Purchase information, such as products and services obtained and transaction histories
4. Internet or online information such as browsing history, and information regarding interaction with our websites, applications, or advertisements

During the past 12 months, we have also disclosed the categories of Personal Data listed above for our business purposes. We have not, however, sold Personal Data that is subject to the CCPA’s sale limitations. The CCPA defines a “sale” as the disclosure of Personal Data for monetary or other valuable consideration.

### Why We Collect Personal Data and How We Use It

The purposes for which we collect and use Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The below lists the purposes for which we collect and use Personal Data in different contexts.

### Purposes for Collection and Use Examples

- Provide and manage products and services
- Establish and process transactions for our products and services
- Support the ongoing management and maintenance of our products and services
- Support our everyday operations, including to meet risk and legal requirements
- Perform accounting, monitoring, and reporting
- Manage, improve, and develop our business
- Market, personalize, develop, as well as improve our products and services
- Conduct research and analysis, including to drive product and services innovation
- Support customer relationship management

### Sources of Personal Data

The sources from which we collect Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of sources from which we collect Personal Data in different contexts.

- From California residents directly, or other individuals acting on their behalf, through physical (e.g., paper application), audible (e.g., phone), or electronic (e.g., website, social media) sources.

### Categories of Third Parties with Whom We Share Personal Data

The categories of third parties with whom we share Personal Data depend on, among other things, our relationship or interaction with a specific California resident. The information below lists the categories of third parties with whom we share Personal Data in different contexts.

### Requests Under the CCPA

A California resident has the right to request that we:

1. Disclose to you the following information covering the 12-month period prior to your request (“Access Request”):
  - a. The categories of Personal Data we collected about you and the categories of sources from which we collected the Personal Data;
  - b. The business or commercial purpose for collecting Personal Data about you;
  - c. The categories of third parties to whom we disclosed Personal Data about you, and the categories of Personal Data disclosed;
  - d. The specific pieces of Personal Data we collected about you; and
2. Delete Personal Data we collected from you (“Deletion Request”).

If you are a California resident, a business may not discriminate against you for exercising your rights under the CCPA.

### Responding to Requests

Privacy and data protection laws, other than the CCPA, apply to much of the Personal Data that we collect, use, and disclose. When these laws apply, Personal Data may be exempt from, or outside the scope of, Access Requests and Deletion Requests. As a result, in some instances, we may decline all or part of an Access Request or Deletion Request related to this Personal Data. This means that we may not provide some or all of this Personal Data when you make an Access Request. Also, we may not delete some or all of this Personal Data when you make a Deletion Request.

As examples, our processing of or response to an Access Request or Deletion Request may not include some or all of the following Personal Data:

- Consumer Accounts. Personal Data connected with consumer accounts used for personal, family, or household purposes. We have other privacy notices describing use and sharing of this data, for example, TRAVDOCS, LLC, d/b/a Travel Industry Solutions, Consumer Privacy Notice, available at [www.travelindustriesolutions.com](http://www.travelindustriesolutions.com)
- Employment. Personal Data about an individual who is a current or former employee (team member) or job applicant, and we use that Personal Data within the context of that individual's role as a current or former employee (team member) or job applicant.
- Business-to-Business Relationships. Certain Personal Data we collect in the course of providing a product or service to another business, or in the course of receiving a product or service from another business.

The types of Personal Data described above are examples. We have not listed all types of Personal Data that may not be included when we respond to or process Access Requests or Deletion Requests.

In addition to the above examples, we may not include Personal Data when we respond to or process Access Requests or Deletion Requests when the CCPA recognizes another exception. For example, we will not provide the Personal Data about another individual where doing so would adversely affect the data privacy rights of that individual. As another example, we will not delete Personal Data when it is necessary to maintain that Personal Data to comply with a legal obligation.

### **How to Make Requests**

If you are a California resident, you can make an Access Request or a Deletion Request by:

1. Contacting us at 833-746-7272; or
2. Submitting your request to [support@travelindustriesolutions.com](mailto:support@travelindustriesolutions.com)

### **Changes to this Notice**

We may change or update this Notice periodically. When we do, we will post the revised Notice on this webpage indicating when the Notice was "Last Updated."

This Notice is provided by TRAVDOCS, LLC, d/b/a Travel Industry Solutions

### **Privacy Notice**

View or download the California Consumer Privacy Act Notice (PDF)