

# BitcoinAsia-Travel Privacy Policy

We recognise the importance of your privacy and take your privacy very seriously. Please read this Privacy Policy carefully, which sets out how we collect, use, store and disclose your data, including how we use cookies.

As a global company, we operate in jurisdictions with varying data privacy laws. In particular, we comply with Regulation No. 2016/679, commonly known as the General Data Protection Regulation ("GDPR").

## 1. Personal Information We Collect

We collect personal information about you in order to provide you with our services, including to facilitate your travel bookings and arrangements, which are accessible at [www.bitcoinasia.travel](http://www.bitcoinasia.travel) (the "Website").

In doing so, we may collect the following types of personal information:

- contact information, including your name, mailing or residential address, email address, telephone number and other contact details;
- passport information, including your passport number, passport expiration date, and date of birth;
- billing or payment information, such as your credit card number, cardholder name, expiration date, authentication code and billing address;
- loyalty program details (such as frequent flyer details);
- information about your health (if disclosed);
- your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the Website, ad data, IP address and standard web log information;
- details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
- any additional information relating to you that you provide to us through your use of our Website, in person or through other websites or accounts from which you permit us to collect information;
- information you provide to us through customer surveys or feedback; or
- any other personal information that may be required in order to facilitate your dealings with us.

## 2. When We Collect Personal Information

We may collect personal information either directly from you, or from third parties, such as when another person makes a travel booking on your behalf (e.g. a family member or friend). We may collect this information when you, or a third party acting on your behalf:

- registers on our Website;
- places an order on our Website;
- communicates with us through correspondence, chats, email, or when you share information with us from other social applications, services or Website; or

- otherwise interacts with our Website, services, content and advertising.

In addition, when you apply for a job or position with us, we may collect certain information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees.

### **3. How We Use Your Information**

We may use the information we collect from you to provide you with our services and improve your experience with us, including to:

- Personalise your experience and to allow us to deliver the type of content and product offerings in which you are most interested;
- Improve our Website in order to better serve you;
- Allow us to better service you in responding to your customer service requests;
- Administer a contest, promotion, survey or other Website feature;
- Quickly process your transactions;
- Ask for ratings and reviews of services or products; and
- Follow up with you after correspondence (live chat, email or phone inquiries).

### **4. Disclosure of Personal Information**

We may disclose personal information for the purposes described in this Privacy Policy to:

- our related bodies corporate and travel service providers that you have booked with (such as airlines, accommodation providers, tour operators and other travel service providers);
- our employees and agents;
- third party suppliers and service providers (including providers for the operation of our Website and/or our business or in connection with providing our products and services to you);
- payment systems operators (eg. merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred, or will potentially be transferred to; or
- other entities, including government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

### **5. Cross-border Disclosure of Personal Information**

We may disclose your personal information to international third parties, including countries outside the European Economic Area (EEA) (collectively “Cross-border Disclosure”), generally to arrange travel with a travel service provider on your behalf. Whenever we perform Cross-border Disclosures, we will do so in accordance with applicable law and ensure that a similar degree of protection is afforded to it by implementing appropriate safeguards.

Cross-border Disclosures outside the EEA will only be made:

- to a country recognised by the European Commission as providing an adequate level of protection; or
- to a country which does not offer adequate protection, but whose transfer has been governed by the standard contractual clauses of the European Commission, or by implementing other appropriate cross-border transfer solutions to provide adequate protection.

## **6. How We Protect Your Personal Information**

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. Your personal information is generally stored in accordance with the applicable law and for the duration of the relevant statutory limitation period. We do not use vulnerability scanning and/or scanning.

We implement a variety of physical, administrative, and technical measures to maintain the safety of your personal information. While we take reasonable steps to protect your personal information from misuse, interference, loss, and unauthorised access, we cannot guarantee the security of your personal information due to inherent risks associated with the transmission of personal information via the internet and where there has been a hardware or software failure, or where other circumstances arise outside of our control.

## **7. Cookies**

We use cookies and similar technologies to help provide, protect, and improve our services. A cookie is a small data file that is transferred to your device (e.g. your phone or your computer). For example, a cookie could allow us to recognise your browser, while another could store your preferences. There are two types of cookies used in connection with our services: (1) “session cookies”, and; (2) “persistent cookies.” Session cookies normally expire when you close your browser, while persistent cookies remain on your device after you close your browser, and can be used again the next time you access our services.

We also use other technologies with similar functionality to cookies, such as web beacons, pixels, mobile identifiers, and tracking URLs, to obtain data. For example, our email messages may contain web beacons and tracking URLs to determine whether you have opened a certain message or accessed a certain link.

We use these technologies for a number of purposes, including:

- To enable you to use and access our services;
- To enable, facilitate and streamline the functioning of and your access to our services;
- To better understand how you navigate through and interact with our services and to improve our services;

- To serve you tailored advertising (on the Website and on third party websites);
- To show you content (e.g. advertisements) that is more relevant to you;
- To monitor and analyse the performance, operation, and effectiveness of our services and advertisements;
- To enforce legal agreements that govern the use of our services;
- For fraud detection and prevention, as well as investigations; and
- For purposes of our own customer support, analytics, research, product development, and regulatory compliance.

We may also allow certain business partners to place these technologies on the Website. These partners use these technologies to (1) help us analyse how you use our Website, such as by noting the third party services from which you arrived, (2) market and advertise our services to you on the Website and third party websites, (3) help us detect or prevent fraud or conduct risk assessments, or (4) collect information about your activities on our Website, other sites, and/or the ads you have clicked on. For example, to help us better understand how people use the Website, we work with a number of analytics partners, including Google Analytics. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-Out Browser by [clicking here](#).

Third parties may also use such tracking technologies to serve ads that they believe are most likely to be of interest to you and measure the effectiveness of their ads both on our Website and on other websites and online services. Targeting and advertising cookies we use may include Google and other advertising networks and services we use from time to time. For more information about targeting and advertising cookies and how you can opt out, you can visit the [Network Advertising Initiative's opt-out page](#), the [Digital Advertising Alliance's opt-out page](#), or <http://youronlinechoices.eu>. To opt out of Google Analytics for display advertising or customize Google display network ads, you can visit the [Google Ads Settings](#) page. To the extent advertising technology is integrated into the Website and you opt-out of tailored advertising, you may still receive advertising content. In that case, the advertising content will not be tailored to your interests. We do not control any of these opt-out links and are not responsible for the availability or accuracy of these mechanisms.

The Website may use social plugins provided and operated by third parties, such as Facebook's login and Google login. As a result of this, you may send to the third party the information that you are viewing on a certain part of our Website. If you are not logged in to your account with the third party, then the third party may not know your identity. If you are not logged in to your account with the third party, then the third party may be able to link information or actions about your interactions with our Website to your account with them. Please refer to the third party's privacy policies to learn more about its data practices.

Most browsers automatically accept cookies. You may choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies, which you can do through your browser settings. Your mobile device may allow you to control cookies through its settings function. Refer to your device manufacturer's instructions for more information. If you turn cookies off, some of the features that make your experience on our Website more efficient may not function properly.

## **8. CAN-SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

**We collect your email address in order to:**

- Send information, respond to inquiries, and/or other requests or questions;
- Process orders and to send information and updates pertaining to orders;
- Send you additional information related to your product and/or service; and
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

**In accordance with the CAN-SPAM Act, we agree to do the following:**

- Not use false or misleading subjects or email addresses;
- Identify the message as an advertisement in some reasonable way;
- Include the physical address of our business or site headquarters;
- Monitor third-party email marketing services for compliance, if one is used;
- Allow users to unsubscribe by using the link at the bottom of each email; and
- Honour opt-out/unsubscribe requests quickly.

**9. Changes to this Privacy Policy**

We reserve the right to update this Privacy Policy at any time. If we believe that any changes to this Privacy Policy are material, we will update the Privacy Policy on the Website and notify you by sending you an email about the changes and/or placing a notice on the Website informing you that changes have been made to the Privacy Policy.

**10. Your Personal Information Rights**

Under applicable law, including the GDPR, you have certain rights in relation to your personal information. These include:

- Requesting access to the personal information that you have provided to us through your use of our services, including the provision of a copy of that personal information;
- Requesting that we add, update, or correct any personal information associated with your account;
- Requesting the deletion of your personal information;
- Restricting the processing of your personal information;
- Objecting to the processing of your personal information; and
- Requesting that we transmit your personal information to a third party.

Personal information provided by you must not be false or misleading. We assume that the information you provide us is accurate and will be updated when the relevant personal information changes. You may choose not to provide certain information to us. Please be aware that, in doing so, your ability to use some parts of our services may be hindered. If you choose to deactivate your account, some of the

information associated with your account may be retained for internal purposes, including to backup data, to assist in investigations, and to comply with applicable law.

We reserve the right to deny you access for any reason permitted under applicable law. If we deny access or amendment, we will provide you with written reasons for such denial unless it is unreasonable to do so and, where required by local data protection laws, will note your request and the denial of the same in our records.

We will respond to any privacy-related requests within a reasonable time. Please note that we may need to verify your identity when you request to access your personal information.

If you would like to make a privacy-related request, please [Contact Us](#).