



TRUE ADVENTURES LLC

TRUE ADVENTURES PRIVACY POLICY

Effective: January 23, 2020

TRUE ADVENTURES is committed to protecting your personal information. We want you to understand our Privacy Policy and what it means to you. If you have any questions about our Privacy Policy, you can contact our Privacy Officer at privacy@trueadventures.org or through the contact information posted below.

The Privacy Policy describes the privacy practices of TRUE ADVENTURES' global group of companies (collectively, "TRUE ADVENTURES").

What is personal information and how do we use or disclose it?

Personal information is information about an identifiable individual, and includes your name, contact information, travel itinerary and other information described below.

Booking Travel

TRUE ADVENTURES may collect, use or disclose your personal information, either directly or through our agency and booking partners, for the purposes of offering or booking travel services on your behalf, such as your name, age, address, phone number, e-mail address, emergency contact information, passport information, travel medical information (where required), insurance details, ISIC information (where applicable), nationality, residency, nutrition preferences, trip evaluations, travel and accommodation preferences, comments you provide us, trip destination information, and payment-related information. This personal information enables us provide you with trip information, book flights, accommodations, process payments, and provide similar travel services.

If you book a TRUE ADVENTURES trip, TRUE ADVENTURES may rely on local service providers. Please be aware that TRUE ADVENTURES may be required to provide certain personal information to our service providers for the purposes of delivering your experience. For

example, if you book flights through TRUE ADVENTURES, we will be required to provide certain personal information to the airline for the purposes of securing your ticket. When you book travel services with us, you consent to collection, use and disclosure of your personal information by TRUE ADVENTURES—and the corresponding collection and use by the relevant travel partners or suppliers—for the purposes of administering and delivering the travel services you requested.

Your personal information may also be used for the purposes of:

- Enabling us to better understand your needs as a customer and determine eligibility for our products and services;
- Informing you about our products and services, or those of our partners that we believe may be of interest to you (provided that we have received valid consent from you, if such consent is required);
- Providing ongoing service and support, including resolution of any issues with the services or products you request from TRUE ADVENTURES;
- Ensuring the safety and security of our passengers and products;
- Carrying out internal accounting and administration of our business;
- Complying with laws, regulations, and immigration requirements.

Travel Agents and Agencies

TRUE ADVENTURES collects personal information (as described above) from agents and agencies as required to book TRUE ADVENTURES' trips and be properly credited for such booking. If you are an agent travelling with TRUE ADVENTURES, TRUE ADVENTURES may also collect employment-related information to confirm your eligibility for travel-industry promotions.

Contests and Newsletters

We may also collect personal information, including contact information such as name, address, and phone number or email address if you elect to enter a contest or sweepstakes with us, subscribe to our newsletter, or request a brochure. We use this personal information for the purposes of administering the contests/sweepstakes or delivering the information you request.

Employment

TRUE ADVENTURES collects personal information from those individuals applying for employment or similar positions at TRUE ADVENTURES to the extent necessary to (i) identify the individual and (ii) evaluate their suitability for the applied-for position. This information may include name, contact information, educational and employment background, criminal record verification, residency and/or citizenship information, and other information necessary for us to screen potential employees and staff.

Service Provider Arrangements

In addition to the third party travel suppliers outlined above, TRUE ADVENTURES may transfer your personal information to third parties who provide services on our behalf. For example, we may use service providers to authorize and process payments, host our customer service operations, serve advertisements on our website, send email or other communications, or run our contests and promotions. Your personal information may be maintained and processed by our service providers in the US or other jurisdictions. For information about the policies or practices of our service providers, please contact us at the email address above. Our service providers are given the information they need to perform their designated functions, and we do not authorize them to use or disclose your personal information for their own purposes.

European Residents: Transfers of Data Outside Europe

Please note that if you are resident in the UK, European Union or European Economic Area (“EEA”) we may hold your personal information outside of the EEA. For instance, your personal information may be held by us in Canada (which has been recognized by the European Commission as having an adequate level of privacy protection).

We may also need to transfer your personal information to travel suppliers and other third parties outside of the EEA, for instance where a supplier is based outside of the EEA. Countries outside of the EEA may not have the same level of privacy laws as exist in the UK, Canada and the EEA. We will take reasonable steps to ensure that your privacy rights are protected.

Sale of Business

We may transfer any information we have about you as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of TRUE ADVENTURES or as part of a corporate reorganization or other change in corporate control.

Legal and Compliance

TRUE ADVENTURES and our service providers may provide your personal information in response to a search warrant or other legally valid inquiry or order, to an investigative body

in the case of a breach of an agreement or contravention of law, or as otherwise required or permitted by applicable law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspect loss or harm to persons or property.

How is your personal information protected?

We have implemented measures designed to help protect personal information in our custody and control. We maintain reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information in our custody and control. Unfortunately, no collection or transmission of information over the Internet or other publicly accessible communications networks can be guaranteed to be 100% secure, and therefore, we cannot ensure or warrant the security of any such information. We have personal information retention processes designed to retain personal information of our customers for no longer than necessary for the purposes stated above or to otherwise meet legal requirements.

Can I access my information and whom do I contact for more information?

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. You may access, update, and/or correct much of your personal information through your account on the TRUE ADVENTURES website, or you may request access, updates and corrections of inaccuracies in personal information we have in our custody or control by emailing or writing to us at the contact information set out below. We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records.

As well as a right to access, update and correct information we hold about you, if you are resident in the USA, UK, European Union or European Economic Area then you have the following additional rights:

- To be told how long your personal information will be retained by us or the basis on which we make decisions about how long we retain your personal information;
- To require that your personal information is deleted by us, subject to any necessary legal requirements we may have to retain the information;
- To object to our processing of your personal information or to restrict processing of your personal information (but we may be unable to provide certain services to you without processing this information);
- To receive a copy of any personal information we hold about you in a portable format;

- To lodge a complaint with a relevant supervising authority (for example the Information Commissioner's Office in the US).

Website Policies and Cookies

Our website uses a technology called a "cookie," which is a small element of data that our website can send to your browser to be stored on your computer so that we can recognize your computer when you return. If you have registered with our website, cookies may provide us and our service providers with information that we will use to personalize our website in accordance with your preferences. Most web browsers allow you to modify your settings to notify you when you receive a cookie or to reject cookies entirely. If you decide not to accept cookies from our website, you may not be able to take advantage of all of its features.

Third Party Cookies

Third party vendors show TRUE ADVENTURES' ads across the internet. These third party vendors use cookies to serve ads based on a user's prior visits to our website. You can opt out of third-party usage of cookies for advertising purposes by visiting the Network Advertising Initiative opt-out page available at: <http://www.networkadvertising.org/choices/>.

We may also use a third party to help us gather and analyze information about the areas that you visit on the website to evaluate and improve the customer experience and the convenience of the website, and to help us evaluate some of the specific information related to your website visits.

Changes to this Privacy Policy

From time to time it may be necessary for TRUE ADVENTURES to amend or make revisions to this Privacy Policy. If we make a change to the Policy, the revised version will be posted on our website. Please refer to this Privacy Policy for the latest information about our personal information practices.