

PRIVACY POLICY

Project Vacation (“PV”) collects different information about the various parties who may utilize its services. This includes information about suppliers, vendors, consumers, agents and resellers. There are 6 broad categories of information that we collect:

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1. Information we require to supply our services. When you first sign up or contract with PV for our services, or when you make an inquiry about our services, we request information such as your name, address, telephone number, domain name, email details of your primary and secondary contacts, credit card details (if you are paying online). We may also ask for your age and gender. We may also monitor and/or record telephone conversations with you from time to time in order to train staff and to improve our service to you.
2. Non personally identifying information. In addition to the information you specifically provide above, PV operates statistics gathering platform on its web site to collect information about the number of visitors coming to the site. No identifying information is collected by this platform. The platform records the IP address of the visitor only. We use this information to improve our own technical structure and performance, and to determine which areas of our web site are most popular. We also use ‘cookies’. Cookies are pieces of information that a web site can transfer to an individual’s computer in order to allow that web site to store information about user preferences. We use cookies that expire once the visitor leaves our web site. Cookies are used to collect session ID’s. It is possible to adjust your Internet browser to refuse cookies, but you may find that this reduces the functionality of this site.
3. Other demographic information. If you respond voluntarily to our surveys or other interactive communications, we collect the responses and use the information to improve the quality and range of PV’s products and services.
4. Personal information stored on a web site hosted by PV. PV will have personal information stored on our servers due to the fact that we host web sites of other organizations. Any information that is submitted to or collected by these organizations will be physically located on a PV server. This information, whether voluntarily provided or not, will not be used or released by PV in any manner, and it will be kept strictly confidential, unless we are required to release the information by law.
5. Information about consumers. PV may gather and store information about consumers and their transactions in connection with the provision of its services. This may include information including the identity of consumers, details of the bookings they have made and all other information that is convenient in relation to the provision of its services.
6. Information about agents and resellers. PV may gather and store information about agents and resellers and their transactions with suppliers in connection with the provision of our services. This may include information relevant to tracking the sales of products by each agent or reseller and all other information about agents and resellers convenient in relation to the provision of our services.
 1. All the above types of information and any other information we may gather about you, your customers, your suppliers and your agents and resellers is hereafter referred to as your “personal information”.

2. If you don't provide us with personal information, we are unlikely able to provide you with our services.

Use of your Personal Information

For the purposes of the General Data Protection Regulation (**GDPR**) we are a data processor. We process the information you provide to us as follows. We collect and use your personal information to operate our web site and deliver our services to you and in order to fulfil our obligations under our terms of service. We will use your personal information to provide you with: technical support, billing and credit control, sales support, product upgrades and information. In the case of parties who have opted to use the PV Marketplace your personal information will also be used in connection with the provision of these services to you. Ordinarily, personal information is processed automatically. When you contract with PV for our services or make enquiries of our services, you will be requested to provide your consent to us to send promotional material to you. If you consent to receipt of promotional material, we will use your personal information to provide you with promotional material. You may stop the delivery or "opt out" of future promotional email from PV by following the specific instructions in the email you receive. These instructions will tell you how to remove your name from our promotional email list. We may use your personal information to:

- Contact you in relation to upgrading your use of our services, special offers (from us, or on behalf of third parties), with newsletters, surveys, and individual service audits. We may give extracts of our customer lists containing personal information to third party contractors to do this on our behalf. We will ensure that those contractors are bound to protect your personal information to the same standard that we are.
- Identify the source of new customers to PV;
- Monitor and address complaints, other feedback, and to resolve disputes;
- In the case of credit cards, to bill you for services;
- In the case of BRNs, to verify your identity;
- In the case of our partners who are IT professionals, to ascertain your areas of specialty and to refer prospective customers to you
- Maintain a technical and account history of your dealings with us, and to re-establish your account with us where you rejoin as a customer within 12 months after having terminated your account;
- Monitor your compliance with our Acceptable Use Policy and other terms and conditions of supply;
- Comply with our reporting and other obligations to third party licensors (such as reporting to platform suppliers the number and identity of platform licenses we have issued as part of our products).

In addition, for parties who have opted to use the PV Marketplace, your personal information will also be used in connection with the provision of these services to you. This may include the release of your personal information to the parties to transactions with you for the purpose of giving effect to those transactions. For example, we are authorized to release to consumers the personal information required for the issue of consumer booking vouchers, and we are authorized to release to agents or resellers the personal information required to determine and account for their commission entitlements from suppliers. We will treat all information we collect from suppliers, consumers, agents, and resellers as strictly confidential. PV does not rent or lease its customer lists to third parties. We will not reveal,

disclose, sell, distribute, rent, license, share or pass onto any third party (other than those who are contracted or supply services to PV including of spam filter operators) any of your personal information unless we have your express consent to do so, other than in the circumstances set out in the next paragraph. We will disclose your personal information, without notice or your consent, only:

- Where we in good faith believe that it is appropriate to disclose information to a party in connection with the efficient provision of our services to you;
- If we are required to do so by law or in the good faith belief that such action is necessary to conform with the laws, applicable code of conduct or legal process served on us in relation to our business or web site;
- To protect and defend the rights or property of PV;
- If we consider it necessary to do so in order to enforce or apply the terms of any of our agreements with you;
- To contractors providing licensed collections services, credit card payment processing and CRM services, who comply with our privacy and security policies;
- If we sell our business or part of it; and
- In extreme circumstances, to protect the personal safety of users of PV's services, its web site, our staff or the public.

In order to provide our services to you, at your request we will disclose the information which we process to countries outside Malaysia. However, that is typically only the case where the information has been collected in a country outside Malaysia

Security of your Personal Information

PV has implemented security features in our database to protect your personal information from unauthorized access. We maintain our servers in a controlled, secured environment. Only staff who need to have access to your personal information in order to perform their job function are authorized to access the database. Constant changes to the Internet and technology mean that we cannot guarantee that data transmission will be 100% secure, or safe from attack by unauthorized intruders. We will endeavor to take all reasonable steps to protect the personal information you may transmit to us or from our online products and services, including credit card information. We will also make our best efforts to ensure its security on our systems. In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us. However, we will not be held responsible for events arising from unauthorized access to your personal information. All transactions are secured by 128 bit SSL encryption. SSL technology encodes information as it is being sent over the Internet, helping to ensure that the information transmitted remains confidential.

Other Disclosure By You

Suppliers, vendors, consumers, agents and resellers might provide personal information through participation in chat sessions, message boards, email exchanges or newsgroups accessed via our web sites, or another service provided by PV. This information is public and immediately available to anyone who has access to such a site; it is not private. PV urges you to enter only information that you are comfortable to share with the public at large in this public domain. This Privacy Policy does not apply to such information. You should

never reveal your password to third parties. If you lose control of your password, you may lose control over your personal information and may be liable for actions taken on your behalf by third parties using your password and/or personal information. Therefore, if your password has been compromised for any reason, you should immediately change it. If you collect personal information which you keep on servers provided by PV as part of our service to you (including email), you alone are responsible for compliance with the Privacy Act 1988 (Cth) in respect of that information. We take no responsibility for your dealings with personal information you collect.

Accessing and Correcting Your Personal Information and other rights

From time to time you may need to update your personal information. We keep this information in a secure environment which you can access through our website. In order to amend any of your personal information, you will be required to give your user name and password. If you believe the personal information we hold about you is inaccurate, incomplete or not up to date, you can request that we amend it. If you contact us via telephone, you will need to answer a few security questions before any personal information is revealed or amended.

Some other rights in relation to your privacy

You may also have a right under various legislation to access the information we hold about you and you can do so by emailing us at web@projectvacation.com. We will aim to respond to requests within a reasonable timeframe. Some individuals also have a right, in certain circumstances, to have the information held about them erased. You can talk to us further about this at web@projectvacation.com. You can also request that we restrict or suspend the processing of your personal information. If you do so, just note that we will then be most likely unable to provide the services to you. The GDPR also provides that in some circumstances individuals have a right to data portability, to withdraw their consent at any time, to object to data processing and to object to processing of data for marketing purposes.

Children's Privacy

PV does not knowingly collect, use or market any information to children. We also urge you to familiarize yourself with your legal responsibilities with regard to children and the Internet, which can be found in our Acceptable Use Policy.

Complaints

If you have a complaint about any aspect of our Privacy procedures, please contact us on web@projectvacation.com. If you don't provide us with personal information we are unlikely able to provide you with our services. We will deal promptly with your complaint. If we cannot resolve the complaint to your satisfaction within a reasonable time, you or we may refer the complaint to the Privacy Commissioner or another appropriate supervisory authority.

Statement of Ownership

This is to certify that this website is owned and run by Project Vacation Travel & Adventure Sdn Bhd (1320612-T)

