

## PRIVACY POLICY

Date of Last Update: October 27, 2020

By visiting, viewing, accessing, browsing, surfing, making any purchase or using our website [www.trovatravelgroup.com](http://www.trovatravelgroup.com) including its sub domains, website pages, hyperlinks or mobile optimized version, if any (“website”) and/or using any of our services, as defined in Terms and Conditions (“website Services”), you either as user of website or a potential agent of the Company (hereinafter referred to as “you”, “your” or “User”) consent to the information collection, disclosure and use practices as described in this Privacy Policy. The website is owned by Trova Travel Group, a North Carolina company registered in the United States and having its registered address located at 9124 Falkwood Rd, Raleigh, NC 27617 hereinafter referred to as “we,” “us” or “our”). This Privacy Policy also sets out how we may collect, use and disclose information in relation to Users of the website.

### Information We Collect

Your privacy is important to us and we have taken steps to ensure that we do not collect more information from you than what is necessary for us to provide the website Services.

For visiting, viewing, accessing, browsing, surfing or using the website, you may be asked to submit the following types of personal data:

**Personal Data:** This may include personal information relating to an identified or identifiable natural person, such as Full Name, Email, Phone Number, Address, any payment gateway details such as Debit/ Credit Card information (only for payment processing) and such other information, data and materials as we may deem necessary for provision of the website Services. We utilize third party companies who use customer data to connect with processing services for us.

**Communication Data:** This may include data relating to any communication that you send to us whether that be through the consultation/contact form on the website, through e-mail or any other mode of communication that you use to contact us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defense of potential legal claims. Our lawful ground for this processing is our legitimate interests which in this case is to reply to communications sent to us, to keep records and to establish, pursue or defend potential legal claims.

**Technical Data:** This may include data about your use of the website and online services such as your IP address, your login data, details about your browser, length of visit to pages on the website, page views and navigation paths, details about the number of times you use the website, time zone settings and other technology on the devices you use to access the website. The source of this data is from our analytics tracking system. We process this data to analyze your use of the website and other online services, to administer and protect our business and the website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer the website and our business and to grow our business and to decide our marketing strategy.

**Marketing Data:** This may include data about your preferences in receiving marketing material from us and our third parties and your communication preferences. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our services, to develop them, to grow our business and to decide our marketing strategy.

We may use Personal Data, Communication Data, Technical Data and Marketing Data (collectively the “Data”) as described herein.

### Consent and its Withdrawal

When you visit, view, access, browse, surf, make any purchase or use the website, you provide us with your consent to use your Data as per this Privacy Policy. In order to provide you with the website

Services, it is necessary for us to collect all relevant and necessary Data from you. In addition, by filling the forms available on the website, you give us your express consent and permission to use your Data.

We will process the Data only after taking written instructions/consent from you mostly in electronic form in the form of Clickable button or a checkbox.

If you change your mind, you may withdraw your consent for us to contact you, for the continued collection, use or disclosure of your information, at any time, by contacting us at [www.travelindustrysolutions.com](http://www.travelindustrysolutions.com).

### **Promotional Emails**

You agree that we may from time to time send e-mail messages to you which offer services, promotions, subscriptions or registration-based services or other material. In compliance with the CAN-SPAM Act, all emails sent from our organization will clearly state who the email is from and provide clear information on how to contact the sender. In addition, all email messages will also contain concise information on how to remove yourself from our mailing lists so that you receive no further email communication from us.

Our emails provide the users the opportunity to opt-out of receiving communications from us and our partners by reading the unsubscribe instructions located at the bottom of any email they receive from us at any time.

Users who no longer wish to receive our newsletter or promotional materials may opt-out of receiving these communications by clicking on the unsubscribe link in the email, OR if you are having trouble, you may opt-out by writing us through email at [Leah@trovatravelgroup.com](mailto:Leah@trovatravelgroup.com). Your preferences will then be updated.

### **How We Use and Process the Data**

The Data collected by us from you may be used to provide you the website Services and better understand your needs in relation thereto, to correspond with you and reply to any of your questions relating to the website Services.

We will not rent or sell your Data to others. We may store the Data in locations outside our direct control (for instance, on servers or databases co-located with hosting providers).

If you provide any Data to us, you are deemed to have authorized us to collect, retain and use that data for the following purposes:

- verifying your identity;
- sending you a welcome e-mail;
- providing you with customer service and responding to your queries, feedback or disputes;
- conducting marketing analysis, sending surveys or newsletters, contacting you about the website Services, activities, special events or offers from us or our partners and for other marketing, information, service development and promotional purposes;
- making such disclosures as may be required for any of the above purposes or as required by law, regulations and guidelines or in respect of any investigations, claims or potential claims brought on or against us;
- sending you notices (for example, in the form of e-mails, mailings and the like) regarding services you are receiving and for billing and collection purposes;
- provide and maintain the website Services;
- notifying you about changes to the website Services;
- sending you information we think you may find useful or that you have requested from us;
- enhancing and improve the website or the website Service such as through personalized features and content;
- analyzing the use of the website and the website Services and the people visiting to improve our content and website and the website Services;
- investigating, preventing or to take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies or as otherwise required by law;

We shall ensure that:

- the Data collected and processed for and on our behalf by any party is collected and processed in accordance with applicable data privacy laws;
- you are always made fully aware of the reasons for the collection of Data and are given details of the purpose(s) for which the Data will be used;
- the Data is only collected to the extent that is necessary to fulfill the purpose(s) for which it is required;
- no Data is held for any longer than necessary in light of the purpose(s) for which it is required;
- whenever cookies or similar technologies are used online by us, they shall be used strictly in accordance with applicable laws;
- you will be informed if any Data submitted by you online cannot be fully deleted at your request under normal circumstances and how to request deletion of any other copies of that Data, where it is within your right to do so;
- appropriate technical and organizational measures are taken to protect the Data;
- data is transferred securely, whether it is transmitted electronically or in hard copy;
- you can fully exercise your rights with ease and without hindrance.

### **Disclosure of Data**

We shall not be able to keep your Data private in response to legal process, i.e. a court order or a subpoena or a law enforcement agency's request. If, in our view, it is deemed appropriate to investigate, prevent or to take action, regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our terms of use or as otherwise required by law, we may be compelled to disclose the Data. Moreover, in case of takeover, merger or acquisition, we reserve a right to transfer your Data to new platform.

We may disclose the Data in the good faith belief that such action is necessary to:

- comply with a legal obligation;
- protect and defend our rights or property;
- prevent or investigate possible wrongdoing;
- protect the personal safety of users of the website Services or the public;
- protect against legal liability.

When necessary, we may also disclose and transfer your Data to our professional advisors, law enforcement agencies, insurers, government and regulatory and other organizations.

### **Data Storage**

Your Data may be stored and processed at the servers in the United States, Europe or any other country in which we or our subsidiaries, affiliates or service providers maintain facilities.

We may transfer your Data to affiliated entities or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with this Privacy Policy and no transfer of your Data will take place to an organization or a country unless there are adequate controls in place including the security of your Data.

We will only retain your Data preferably for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any record retention or reporting requirements under applicable laws. When deciding what the correct time is to keep the Data, we look at its amount, nature and sensitivity, potential risk of harm from unauthorized use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

### **How We Protect Your Information**

We store all the Data submitted by you through the website at a secure database.

We are concerned with protecting your privacy and Data, but we cannot ensure or warrant the security of any Data you transmit or guarantee that your Data may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards.

No method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Data, we cannot guarantee its absolute security. If you have any questions about security of the website, you can contact us at [Leah@trovatravelgroup.com](mailto:Leah@trovatravelgroup.com)

Any Data supplied by you will be retained by us and will be accessible by our employees, any service providers engaged by us and third parties.

### **Compliance with CalOPPA**

We are also committed to complying with the California Online Privacy Protection Act (“CalOPPA”) which requires commercial websites and online services to post a privacy policy. The law requires any person or company in the United States (and conceivably the world) that operates websites collecting ‘personally identifiable information’ from California consumers to post a conspicuous privacy policy on its website stating exactly the information being collected and those individuals or companies with whom it is being shared. As required under CalOPPA, we agree to the following:

- Users can visit our site anonymously.
- Our Privacy Policy link includes the word ‘Privacy’ and can easily be found on the page specified above.
- We endeavor to fulfil requirements of the CalOPPA under this Privacy Policy in line with our policy for user data collection, storage, and disclosure as outlined above.

### **Cookies**

We use technologies such as cookies to make better users experience, customize content, to provide social media features and to analyze traffic to the website. Where applicable the website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer/device.

Cookies are small files saved to the user’s computers’ or mobile devices’ hard drive or memory that track, save and store information about the user’s interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within the website.

Users are advised that if they wish to deny the use and saving of cookies from the website on to their computers hard drive they should take necessary steps within their web browsers security settings to block all cookies from the website and its external serving vendors.

We may gather certain information automatically and store it in log files. This information includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and click stream data. We may use this information, which does not identify individual users, to analyze trends, to administer the website, to track users’ movements around the website and to gather demographic information about our user base as a whole.

We may track the referring URL (the web page you left before coming to the website) and the pages, links, and graphics of the website you visited. We do so because it allows us to evaluate the reputation and responsiveness of specific web pages and any promotional programs we may be running.

Managing Cookies: Many web browsers allow you to manage your preferences. You can set your browser to refuse cookies or delete certain cookies. You may be able to manage other technologies in the same way that you manage cookies using your browser’s preferences.

Please note that if you choose to block cookies, doing so may impair the website Services or prevent certain elements of it from functioning.

### **Children**

Our website, products and services are not intended for children under 13 years of age. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our website, products or services. If we learn we have collected or received personal information from a child then we will take steps to delete that information as soon as possible.

### **Third-Party Service Providers**

We may employ third party companies and individuals to facilitate the website Services ("Third Party Service Providers"), to provide the website Services on our behalf, to perform website Services-related services or to assist us in analyzing how the website Service is used.

These third parties have access to your Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

### **Changes to this Privacy Statement**

We may modify these this Privacy Policy from time to time and any such change shall be reflected on the website with the updated version of the Privacy Policy and you agree to be bound to any changes to the updated version of Privacy Policy when you use the website or the website Services.

You acknowledge and agree that it is your responsibility to review the website and this Privacy Policy periodically and to be aware of any modifications. Updates to this Privacy Policy will be posted on this page.

Occasionally there may be information on the website that contains typographical errors, inaccuracies or omissions that may relate to service descriptions, pricing, availability, and various other information, and we reserve the right to correct any errors, inaccuracies or omissions and to change or update the information at any time, without prior notice.

### **Contact Us**

If you have questions about our Privacy Policy, please contact us at [Leah@trovatravelgroup](mailto:Leah@trovatravelgroup), by calling 919.272.2668 or writing us at 9124 Falkwood Rd, Raleigh, NC 27617