Privacy Policy



Safe Harbor Privacy Policy for Trisept Technology, LLC

This privacy policy applies to <u>http://www.triseptsolutions.com</u> and to <u>https://rezagent.triseptsolutions.com</u> owned and operated by Trisept Technology, LLC. This privacy policy describes how Trisept Technology, LLC collects and uses the personal information you provide on our web site <u>http://www.triseptsolutions.com</u>, and through our Trisept Hosting Platform, <u>https://rezagent.triseptsolutions.com</u>. It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

Trisept Technology, LLC, Inc. (Trisept, "We") is a leisure travel technology services company whose office is located in Milwaukee, WI United States of America. Trisept develops, delivers and supports travel reservation technology that allows their clients to service reservations from an online booking engine, through travel agents and, when appropriate, through call centers. Trisept processes customer travel data from its data centers in the USA. Customer travel data includes personal information of individuals located in the European Union and Switzerland who purchase travel products through the Trisept platform. Trisept is not responsible for the content of the information it processes or responsible for the way their clients treat personal information they collect or control.

Scope of Policy

Trisept recognizes your right to privacy and has implemented these privacy practices with regard to personal information ("Personal Information"). These privacy practices comply with the U.S.-EU and U.S.-Swiss Safe Harbor frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, retention and transfer of data from the European Union.

Protecting consumer privacy is important to Trisept. This privacy policy outlines our general policy and practices for implementing the principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and ability to correct that information. Personal Information collected directly from individuals within the European Union and/or Switzerland by Trisept will do so in a lawful manner in following with the U.S.-EU and U.S.-Swiss Safe Harbor principles. Your submission of such information online is deemed your consent to Trisept's use of the information as contemplated in this Privacy Policy.

TRUSTe

Trisept Technology has been awarded TRUSTe's Privacy Seal signifying that this privacy policy and practices have been reviewed by TRUSTe for compliance with the TRUSTe

program. In order to view our relationship with TRUSTe, please visit the validation page visible by clicking the TRUSTe seal. If you have questions or complaints regarding our privacy policy or practices, please contact us at <u>privacycontact@triseptsolutions.com</u>. If you are not satisfied with our response you can contact <u>TRUSTe here</u>. The TRUSTe certification covers information collected on our site <u>http://www.triseptsolutions.com</u> and through our Trisept Hosting Platform, <u>https://rezagent.triseptsolutions.com</u>. The use of information collected through our service shall be limited to the purpose of providing the service for which the Client has engaged Trisept.

Notice

We may update this privacy policy to reflect changes to our information practices. If we make any material changes we will notify you or our Client by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Choice

If you wish to subscribe to our newsletter(s) or promotional emails, we will use your name and email address to send the communications to you. You may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, or you can contact us at privacycontact@triseptsolutions.com.

You may opt out of having your personal information originally collected or authorized by you by emailing us at <u>privacycontact@triseptsolutions.com</u>.

If you receive material from one of Trisept business customers or other third parties, and no longer wish to receive such material, you should opt-out directly with that business customer.

Service-Related Announcements

We will send you service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we may send you an email.

Relevance

Trisept does not collect personal information about you on the website without your knowledge.

If you wish to sign up for our services, contact us or apply for a job on our site we will collect certain personal information about you. The information we may collect is name, email, address, phone number, and a resume. We use this information to contact you regarding your inquiries and the services you have expressed interests in as well as to determine whether or not you are qualified for the position in which you have applied.

Cookies and Other Tracking Technologies

We and our business clients use cookies or similar tracking technologies. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

We use cookies to identify a return visitor or used as a way to measure activity and traffic patterns on the site. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

Behavioral Targeting / Re-Targeting

We partner with a third party to either display advertising on our Web site or to manage our advertising on other sites. Our third party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking <u>here</u>. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Log Files

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We do not link this automatically collected data to other information we collect about you.

Accuracy/ Data Integrity

Trisept has implemented reasonable measures to ensure that your personal information is relevant for the purposes for which it is to be used and is accurate, complete, and current.

Access

You may have access to your personal information by sending a request to <u>privacycontact@triseptsolutions.com</u> for correcting, deleting inaccuracies or updating such information. We will respond to your access request within 30 days.

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us at the email address provided above. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Security

Trisept takes reasonable precautions to protect your personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction. Please note that transmitting any information involved the inherent risk of theft and unauthorized use. No method of transmission over the Internet, or method of electronic storage, is 100% secure, therefore, we cannot guarantee its absolute security.

When you login and use our Hosting Platform we encrypt the transmission of that information using secure socket layer technology (SSL).

Sharing

We will share your personal information with third parties only in the ways that are described in this privacy policy. We do not sell your personal information to third parties.

Trisept does not sell or disclose personal information to third parties. We may disclose your personal information as required by law, such as to comply with a subpoena, or similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

Trisept occasionally hires other companies to provide services on its behalf, including but not limited to the following: providing customer support, processing transactions, sending out emails on our behalf, or performing statistical analysis of the website or our services. We may provide Personal Information to these third parties but we authorize them to use this Personal Information only to perform the services on our behalf. Such parties our bound by contract to establish reasonable measures to protect your data from unauthorized access, use or disclosure.

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, you will be notified via email and/or prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Onward Transfer

Prior to disclosing Personal Information to a third party, Trisept shall notify the individual of such disclosure and allow the individual the choice (opt out) of such disclosure. Any third party for which Personal Information may be disclosed; Trisept will require the same level of privacy protection as is required by the U.S.-EU and U.S.-Swiss Safe Harbor principles and agree in writing to provide an adequate level of privacy protection.

Enforcement

Trisept uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended, completely implemented and accessible and in conformity with the Principles.

Trisept complies with the U.S. – E.U. Safe Harbor framework and the U.S. - Swiss Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal data from European Union member countries and Switzerland. Trisept has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Trisept's certification, please visit <u>http://www.export.gov/safeharbor/.</u>

Links to Other Sites

This site contains links to other sites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other sites.

We encourage you to be aware when you leave our site and to read the privacy policies of each and every site that collects personal information.

This privacy policy applies only to information collected by this site.

Information Related to Data Collected through the Trisept Hosting Platform

We collect the following kinds of personal information from our Clients: name, email address, phone number, address and date of birth under the direction of our Clients..

We also collect the following sensitive information from our clients: account information such as credit card number and card expiration date, passport number, and necessary travel documents. This information is collected under the direction of our Clients to help them process the data.

We collect information under the direction of our Clients, and have no direct relationship with the individuals whose personal data we process. Trisept works with its Clients to help them provide notice to their customer concerning, the purpose for which personal information is collected.

Choice

We collect information for our Clients, if you are a customer of one of our Clients and would no longer like to be contacted by one of our Clients that use our service, please contact the Client that you interact with directly.

Service Provider, Sub-Processors/Onward Transfer

We may transfer personal information to companies that help us provide our service. Transfers to subsequent third parties are covered by the provisions in this Policy regarding notice and choice and the service agreements with our Clients.

Access to Data Controlled by our Clients

We have no direct relationship with the individuals whose personal data we process. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should

direct his query to our Client (the data controller). If the Client requests us to remove the data, we will respond to their request within 30 business days.

Data Retention

We will retain personal data we process on behalf of our Clients for as long as needed to provide services to our Client. We will retain and use this personal information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Contact Information

Questions, comments or complaints regarding the Company's Safe Harbor Policy or data collection and processing practices can be mailed or emailed to: privacycontact@triseptsolutions.com

Trisept Technology, LLC, Attn: Legal Department, 777 West Glencoe Pl., Milwaukee, WI 53217

Effective Date: May 4, 2016 Copyright © 2016 Trisept Solutions.