

# Travelsoft Technology Privacy Policy

## The Role of Travelsoft Technology

Travelsoft Technology fulfils the role of intermediary as defined in the Consumer Protection Act, 2008. A copy of this act can be viewed online at: [http://www.acts.co.za/consumer\\_protection\\_act\\_2008](http://www.acts.co.za/consumer_protection_act_2008)

## What are the Purposes of this Privacy Policy

Travelsoft Technology recognizes the importance of protecting the privacy of personal data or personally identifiable information (“**Personal Information**”) about the individual travellers that we process in our Application. We want you to be familiar with how we collect, use and disclose Personal Information (information that identifies you as an individual). This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Travelsoft Technology requests that you read this Privacy Policy carefully and in its entirety as it relates to your rights regarding your Personal Information. We treat the Personal Information we receive about individuals through our Application in accordance with this Privacy Policy.

## Personal Information

Personal Information is information or an opinion, in any form (whether true or not) about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion.

The Application collects, processes and stores only such Personal Information as is necessary to provide the services offered. The specific purpose for which information is collected is apparent from the context in which it is requested.

## How does Travelsoft Technology Collect Information?

Travelsoft Technology collects and processes the following data about you:

- **Information you provide us.**

We collect information when you provide it to us voluntarily. Generally this occurs when you register on the Application or utilise the Application. You are not legally required to provide the Personal Information that we request, but, if you choose not to do so, in many cases your affiliated Travel Management Company will not be able to provide you with their full range of services or respond to any queries you may have.

- **Information we receive from other sources.**

We may receive information about you from your affiliated Travel Management Company in the form of data files, which is used for data imports into the Application. If you use any other services Travelsoft Technology provides, we may receive information about you from them.

We are required by law to obtain your consent to the collection of sensitive information, which is granted by your acceptance of the Privacy Policy upon first login.

## What Types of Information Do We Collect

Travelsoft Technology gathers the following information:

- **Personal Information**

This is information that identifies you as an individual. The information we collect may include your name, address, e-mail address and phone number, financial and credit card information, personal description, travel documents, photograph or other information. The Personal Information collected is required for your traveller profile in order to facilitate your travel reservation arrangements and bookings via your affiliated Travel Management Company. The more information we have about you the better your Travel Management Company is able to provide you with the best possible service.

- **Non-Personal Information**

Aggregated information about your use of the Application, including the full Uniform Resource Locators (URL) clickstream to, through and from the Application, (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse overs), and methods used to browse away from the page.

- **Technical Information**

This may include your IP Address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

### **How do we use Information Collected from you?**

Travelsoft Technology may use and disclose your Personal Information for the purposes for which it was collected, or for a related purpose defined in this Privacy Policy, such as any one or more of the following purposes:

- To enable us to provide you with access to and use of the Application.
- To contact you to administer and support the Application.
- To notify you about changes to our services.
- Submit to various regulatory bodies, law enforcement officials and Travel Management Companies to protect you against fraud and for related security purposes.
- Where authorized by you or by law to send you notifications that you have agreed to.
- To permit you to send messages regarding Application-related content to a valid colleague through the Application. If you wish to use this feature, you may be required to provide us with, and we may use, your colleague's e-mail address to facilitate message sending to your colleague. By using this functionality, you affirm that you are entitled to use and provide us with the recipient's name and email address for this purpose. Travelsoft Technology shall not assume any liability that may arise from sending this kind of messages to the recipients. Any resulting liability will be your responsibility as you are the person who facilitated your colleague's data. We will not to use your colleagues Personal Information for any other purpose other than to allow the email to be sent, unless we disclose such other purpose to you at the time you provide such Personal Information to us.
- For our internal business purposes, such as data analysis, audits, developing new products, enhancing our Application, improving our services, identifying usage trends and determining the effectiveness of our Application.

**Non-Personal Information.** Because Non-Personal Information does not personally identify you, we may use it for any purpose. In addition, we reserve the right to share Non Personal Information, which does not personally identify you, with your affiliated Travel Management Company, for any purpose. In some instances, we may combine Non-Personal Information with Personal Information (such as combining your name with your geographical location). If we do combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information hereunder as long as it is so combined.

Other than the above, we will not disclose your Personal Information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorized or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity. Your Personal Information will remain confidential at all times.

By providing us with your Personal Information you consent to its use in accordance with this Privacy Policy.

### **Disclosure of Personal Information and Information Sharing**

Travelsoft Technology does not disclose your personal data to any third party except under approval from the affiliated Travel Management Company, as necessary to fulfill your travel arrangements and services. All data submitted to third parties will be encrypted using SSL technology and access is login & password based. The following describes the ways that any Personal Information can be disclosed:

- Personal Information data can be submitted to one or more GDS's reservation systems.
- Personal Information data can be submitted to Corporate Booking Engines.

- Personal Information data can be submitted to other internal Travel Management Company systems.
- Personal Information data can be submitted to secure Tokenization providers for secure data storage.

We will ensure as best we can that the received data is stored and managed by the Travel Management Company in a secured environment with the appropriate confidentiality and security measures before effecting any data disclosure, but we cannot be liable for any security or data breach on the utilization part of the Travel Management Company with regards to your data, and as such does not exercise any control over any such third parties.

We may also process and disclose Personal Information as required by law, subpoena, and regulation or when requested by government or law enforcement authorities for authentication, fraud prevention or as otherwise required or permitted by law.

Please take into account that some of the third parties, we may share Personal Information with, may be located in countries outside the South Africa, which, from a data protection perspective, may offer a non-equivalent level of protection. We will take steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy Policy.

Travelsoft Technology will not sell or share any of the information collected, other than to parties agreed to with the your affiliated Travel Management Company. Travelsoft Technology does not disclose Personal Information to any analytic services or social network providers.

### **Data Security and Integrity**

Travelsoft Technology uses the Personal Information you provide to us only for the purposes for which it is intended and not in any way that is contrary with the purposes for which it was collected or otherwise stated in this Privacy Policy. The security of all information we receive is an important concern to us. We use reasonable organizational, technical and administrative measures to protect Personal Information under our control from loss, misuse, and unauthorized access, disclosure, alteration and destruction.

Travelsoft Technology also takes reasonable steps to keep Personal Information accurate, current, complete, and reliable, including providing mechanisms by which you can amend, update and delete your Personal Information.

We conduct periodic reviews of our data collection, storage, processing, and security measures to ensure we are only collecting, storing, and processing Personal Information that is required for our Application services. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. While we make every effort to ensure the integrity and security of our infrastructure, we cannot guarantee, ensure, or warrant that our security measures will prevent illegal or unauthorized activity related to your Personal Information. Travelsoft Technology cannot under any circumstances be held liable for any loss or other damage sustained by illegal or unauthorized activity.

Travelsoft Technology currently uses security measures, such as the Secure Sockets Layers (SSL) & TLS 1.2 protocols, firewalls and 128 bit encryption techniques, and audit trails to safeguard Personal Information and unauthorized access to systems. The personally identifiable information we collect about you is stored in a protected environment with limited access. Access to servers is IP Address restricted for additional security. We maintain the above safeguards to protect the security, integrity, and privacy of these servers and your personally identifiable information.

Passwords are used to help protect your Personal Information, and it is your responsibility to keep your password confidential. Do not share such information with anyone. If you are sharing a computer with anyone you should always choose to log out before leaving a site, Application or service to protect access to your password and Personal Information from subsequent users.

Travelsoft Technology does not utilise any analytic services, embedded content or integrate with social network and sharing tools in order to further protect the integrity of your Personal Information.

## Use of Cookies

- What is a Cookie:

A cookie is a text-only string of information stored by your browser on your device (e.g. computer or mobile phone) when you visit a website/web Application. Cookies are used to make your use of the website/web Application easier as well as provide business information to the website/web Application operator.

- Types of Cookies:

There are session cookies and persistent cookies, as well as first party and third party cookies.

Session cookies allow actions to be tracked during a single browser session. They are deleted from your device when you close the browser. Persistent cookies remain on your device between sessions and allow a website to “recognise” a user on their return and to remember their preferences, they will remain stored on your device until deleted or they reach a specified expiry date. Session and persistent cookies can be either first or third-party cookies - a first-party cookie is set by the website/web Application being visited. A third-party cookie is issued by a party other than website/web Application being visited.

- How we use Cookies:

The Application only uses session cookies, which cannot identify you personally.

Only **strictly necessary cookies** are used for the following purposes:

These are essential cookies that are required for the operation of the website/web Application and to allow you to use its features. They include, for example, cookies that enable you to log into secure areas of our website/web Application and carry out specific tasks, and to keep a session open after a user logs in.

## Notifications Email Address

When the Application generates email notifications, the From email address and Return email address used in the emails are provided to Travelsoft Technology by your affiliated Travel Management Company, and are generally a no-reply email address whereby the return mail box is not monitored. Travelsoft Technology will not be liable for any Personal Information or request not actioned in any returned email reply, nor will we use the return email address for any other purpose and will not share the return email address or content therein with anybody.

## Opt-Out

Travelsoft Technology does not promote, nor generate any customer surveys or marketing campaigns directly from our Application whereby your Personal Information is utilised. Our Application does cater for an indicator whereby you can Opt-In or Opt-Out to customer surveys or marketing campaigns promoted by your affiliated Travel Management Company subscribed to our Application. Whether your affiliated Travel Management Company abides by your selection is out of the control of Travelsoft Technology.

## Data Retention

Travelsoft Technology will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

Travelsoft Technology we will not be liable for any direct or indirect loss or damages of any kind, which you may suffer as a result of the loss of your data, or any part thereof, for any reason whatsoever.

Travelsoft Technology will, unless otherwise required by law, delete all your data from our Application and Servers upon service termination between Travelsoft Technology and your affiliated Travel Management Company, unless directly instructed by the data owner to retain data for whatever reason.

## Data Deletion

Upon Account Deletion, Un-Subscription or by your confirmed request your data will be permanently deleted from the Application, Databases and Back Ups.

## **Data Access**

The data accessed, entered, or imported on instruction, is stored securely in a database and is only accessible to you and approved users of your organization or your affiliated Travel Management Company. An administrator will have full control over who is invited to be a user. A registration which incorporates the creation of a user name and password is required in order to gain access to the Application.

Inside and, where appropriate, your organizational users or your affiliated Travel Management Company users have the ability to view your data and may do so to ensure data quality and to diagnose potential operational problems within the Application.

It is the user's responsibility to keep their passwords safe. It is your affiliated Travel Management Company Administrator's responsibility to ensure that any users they invite to use the Application have permission to view the information stored in the Application. It is your affiliated Travel Management Company Administrator's responsibility to remove any users who should no longer have access to the Application.

You represent, warrant and undertake that when using the Application you will at all times comply with all applicable local and national laws including but not limited to those relating to privacy and the processing of personal data and other information. You agree to promptly comply with any request from Travelsoft Technology requiring you to amend, transfer and/or delete any information recorded by you on our Application. You also agree to provide us with full co-operation and assistance in relation to any complaint, notice or communication that relates directly or indirectly to the processing of personal data or other information or to your compliance with any applicable local and national laws.

You agree to indemnify Travelsoft Technology and keep us indemnified and defend us at your own expense against all costs, claims, damages or expenses incurred by Travelsoft Technology or for which we may become liable due to any failure by you (or your employees or your affiliated Travel Management Company (where applicable)) to comply with your obligations under this Privacy Policy.

If you do not consent to the data use described in this Privacy Policy, you may choose not to use the Application.

## **Data Ownership**

All data accessed, entered, stored or imported on instruction, by the users of an organisation, remains your property and Travelsoft Technology will not use nor make available for use any of this information without your permission.

## **Your Rights**

If you would like to access, review, correct, update or otherwise limit our use of your Personal Information that has been previously provided to us, you may contact us in English language via email: [webserver@travelsoft.co.za](mailto:webserver@travelsoft.co.za)

## **Application Usage, Monitoring**

Travelsoft Technology analyzes and processes transactional data for statistical purposes. This data is used for server monitoring and software performance as well as the identification of trends, and other activities in the travel industry. Statistical data contains no user information, or data that can be linked to any specific user. Travelsoft Technology utilises the statistical data in order to better understand how our customers are using the Application so we can improve the system design and performance.

## **Note Regarding the Use of the Application by Children**

The Application is not directed to individuals under the age of eighteen (18), and we request such individuals not to provide Personal Information through the Application.

## **Jurisdiction Issues**

Travelsoft Technology does not represent or warrant that the Application or any part thereof, is appropriate or available for use in any particular jurisdiction. Those who choose to access the Application do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. We may limit the Applications availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and in our sole discretion. By using the Application and submitting any Personal Information, you consent to the transfer of Personal Information to South Africa which may provide a different level of data security than in your country of residence.

## **Enforcement**

Travelsoft Technology has established internal procedures to monitor our compliance with the South African Protection of Personal Information Act and the respective data protection laws. If you believe that Travelsoft Technology has not complied with this Privacy Policy with respect to your Personal Information, you may send your questions and concerns to the email address as provided below. Please describe in as much detail as possible the ways in which you believe that the Travelsoft Technology Privacy Policy has not been complied with. We will investigate your complaint promptly. If your inquiry is not reasonably resolved, Travelsoft Technology will cooperate with the relevant authorities to resolve the issue.

## **Legal Notice**

Travelsoft Technology may be acquired, merge with another business, acquire, or buy other businesses or assets. In such transactions, Personal Information is generally one of the transferred business assets. In such an event, both personal and non-personal identifying information will be part of the transferred assets.

## **Contacting Us, Questions and Comments**

If you have any questions regarding this Privacy Policy, please contact us via e-mail at [webserver@travelsoft.co.za](mailto:webserver@travelsoft.co.za)

## **Publication, Effective Date and Privacy Policy Changes**

This policy is published by Travelsoft Technology. Travelsoft Technology is a South African Close Corporation. For the purpose of the Protection of Personal Information Act, the data controller is Travelsoft Technology, with its principal place of business located at 447 Highland Road, Kensington, Johannesburg, Gauteng, South Africa, 2094, Telephone: +27 11 615 0393. Travelsoft Technology reserves the right to revise, amend, or modify this Privacy Policy at any time and in any manner.

Effective Date: This policy was last updated on March 27, 2018.

Published Version: 3.03.2018.

This Privacy Policy is subject in all respects to the use of the [www.profilemanager.travel](http://www.profilemanager.travel) application.

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