

PIN TRAVELER PRIVACY POLICY

Updated April 9, 2023

This PRIVACY POLICY is the entire personal data protection policy (hereinafter “**Privacy Policy**”) for the product or service provided by Pin Traveler, LLC.

We appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this Privacy Policy, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it.

Before accessing or using <https://pintraveler.net>, please ensure that you have read and understood our Privacy Policy. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our Services immediately.

If you have any queries about this Privacy Policy or data protection in general, please contact: privacy@pintraveler.net

1. GENERAL INFORMATION

- 1.1. This Privacy Policy was drawn up by Pin Traveler, LLC. a company registered at 1401 Pennsylvania Ave STE 105 Box 1748, Wilmington, DE 19806, USA (“Pin Traveler”, “we,” “us” or “our”) who is committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, share and protect data that identifies or is associated with you (“personal data”) in relation to our website <https://pintraveler.net> (as well as any other media form, web application, media channel, mobile website or iOS and Android mobile application related, linked, or otherwise connected thereto) including the services offered on such website (hereinafter collectively the “Platform” or “Site”), and your choices about the collection and use of your information.
- 1.2. This Privacy Policy will enter into force on the date stated above. If this document is updated, we will notify you of the revised versions through our regular channels. For more information regarding updates please see the section titled “Updates to the Privacy Policy” below.
- 1.3. As Pin Traveler is a company residing and operating in the State of Texas in the United States of America, it is subject to any and all federal and state laws applicable to Texas entities. Please note that this Privacy Policy was prepared in line with the applicable laws of the State of Texas relating to data privacy. Recognizing the global nature of the Internet, throughout the Privacy Policy, reference has been made to other jurisdictions and regulations which may be applicable to some users. However, we hereby expressly state that any such reference was made for ease of

understanding of users and those persons who choose to access the Site from other locations do so on their own initiative and does not mean or imply that Pin Traveler is subject to the laws and regulations of said jurisdiction.

- 1.4. Hereinafter, any person who is registered to the Platform shall be referred to as “Member”. Any person who visits the Platform without registration shall be referred to as “User”. Pin Traveler hereby acknowledges its Data Controller status in terms of Members and Users of the Platform.
- 1.5. Pin Traveler provides a social media platform which enables the Members to load, store and share travel information, photographs, location, and other data related to their past, current and future travels categorized as individual location “Pins”. Pins will include location information (for example “London”) as well as any other travel information and/or photograph you associate with such Pin.
- 1.6. This Privacy Policy applies to all the products and services provided on the Platform to Members and Users by Pin Traveler as the Data Controller.**
- 1.7. Please note that this Privacy Policy has been prepared in line with Pin Traveler’s Terms of Use available at https://pintraveler.net/terms_of_use and Pin Traveler does not intend for the Platform to be used by persons who are prohibited from using the Platform as per its Terms of Use. In terms of the collection of personal data, we would like to stress that we do not knowingly solicit data from children under 18 years of age. As stated in our Terms of Use, by using the Platform, you represent that you are at least 18. If we learn that personal data from users who are under 18 years of age has been collected due to their misrepresentation during Membership, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at privacy@pintraveler.net

2. WHAT IS PERSONAL DATA?

- 2.1. “Personal Data” used throughout this Privacy Policy means in short personally identifiable information of Users and Members of Pin Traveler Platform that is collected online by Pin Traveler from User/Member and maintained by Pin Traveler in an accessible form, including a first and last name, a physical address, an e-mail address, a telephone number, a Social Security number, or any other identifier that permits the physical or online contacting of the User/Member, and any other information concerning the User/Member collected by Pin Traveler from User/Member and maintained in personally identifiable form in combination with any identifier described in this paragraph.

3. ON WHAT BASIS DO WE COLLECT OR USE PERSONAL DATA?

- 3.1. Data protection laws require that we meet certain conditions before we are allowed to use your personal data in the manner described in this Privacy Policy. To use your personal data, we will rely on one of the following conditions, depending on the activities we are carrying out:
 - 3.1.1. You have given us consent;
 - 3.1.2. Processing is necessary for our legitimate business interests or those of a third party: provided this does not override any interests or rights that you have as an individual.
 - 3.1.3. Processing is necessary in order to enter into or perform a contract with you
 - 3.1.4. Processing is necessary for compliance with our legal obligations
 - 3.1.5. Processing is necessary for legal claims
 - 3.1.6. Processing is necessary for substantial public interest.
- 3.2. Below you will find detailed information on the basis that we collect and use your personal data. If we look to use your personal data for any other purpose not covered in this privacy notice, we will let you know about any proposed new purposes before using your personal data in this way.

3.3. Consent

- 3.3.1. We ask that you provide affirmative and informed consent to the use of your personal data as described in this Privacy Policy when you access the Platform and participate in the Services.
- 3.3.2. We do not collect personal data for the purpose of sale of such information in a way that specifically identifies the individual (i.e., we don't sell Member information).
- 3.3.3. We may provide you with marketing information about our services or products where you have indicated your consent for us to do so (to the extent that we are required to collect consent under data protection laws). We may contact you by mail or email, phone and electronic notifications (where you have agreed to those methods of communication) to provide you with the information on your requested service or product. We may also provide you with information, special offers, research, promotions, and similar products and services. Where you have indicated your consent to us doing so, we may also pass your details to our group companies. You may change your marketing preferences at any time from your account settings.
- 3.3.4. We will also provide you with access to, or transfer your personal data at your written request, provided that we aren't legally restricted from doing so or

otherwise prevented from doing it due to circumstances beyond our reasonable control.

- 3.3.5. If we are relying solely on your consent to process your personal data, you may withdraw your consent to our processing of your personal data at any time; however, withdrawing consent may result in your inability to continue using some or all of the services in the Platform. Please note that the withdrawal of your previous consent this will not affect the lawfulness of the processing before its withdrawal, nor will it affect the processing of your personal data conducted in reliance on lawful processing grounds other than consent.

3.4. Legitimate Interest

- 3.4.1. Sometimes our collection and use of your personal data may not depend on your informed consent but our legitimate interests. It is in our legitimate interests to collect your personal data as it provides us with information that we need to provide our services to you and to make our Platform available.
- 3.4.2. This requires us to carry out a balancing test of our interests in using your personal data (for example, in order to provide you with access to the Platform, against the interests you have as a citizen and the rights you have under Data Protection Law (for example, to not have your personal data sold to third party marketing companies without your knowledge).
- 3.4.3. The outcome of this balancing test will determine whether we may use your personal data in the ways described in this privacy notice. We will always act reasonably and give full and proper consideration to your interests in carrying out this balancing test.
- 3.4.4. Our legitimate interests are: managing our business and relationship with you or your company or organization; understanding and responding to inquiries and Member and User feedback; understanding how our Members and Users use the Platform; identifying what our Members and Users want and developing our relationship with you, your company or organization; improving our Platform and offerings; managing our supply chain; developing relationships with business partners; sharing data in connection with acquisitions and transfers of our business.

3.5. Contractual Performance

- 3.5.1. Please note that when you become a Member of the Platform you enter into a contractual relationship with Pin Traveler via the Terms of Use which you accept. This contractual relationship necessitates the processing, use and storage of your personal data for the purpose of fulfilling our contractual obligations and/or facilitating our contractual rights. Therefore, at this stage the contractual

relationship itself becomes the legal basis of our processing of your personal data.

- 3.5.2. In short, we are permitted to hold and process some of your personal data because it is necessary to do so in order to provide you access to, and to enable you to make use of, the Platform. Without this personal data, we could not provide you with access to the Platform.

3.6. Legal Obligations and Legal Claims

- 3.6.1. We are permitted to process your personal data where it is necessary for compliance with our legal obligations. We are also permitted to process your personal data where it is necessary to establish, pursue or defend a legal claim.
- 3.6.2. We may disclose your personal data to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the Services, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. We may disclose personal data when we believe in good faith that such disclosure is required by and in accordance with the law.

3.7. Substantial Public Interest

- 3.7.1. We are permitted to process your personal data where it is necessary for reasons of substantial public interest, on the basis of data protection laws.

4. USE OF COLLECTED DATA

- 4.1. We use your personal data to help us provide and support (the services on) our Platform. This section provides you with details of what personal data we use and why we use it.

4.2. What Data Do We Use?

- 4.2.1. We collect information directly from you and in some instances from third party service providers whom you authorize to share your information with Pin Traveler.
- 4.2.2. Depending on whether you are a User or Member, personal data collected from you will differ. As explained above, if you only visit the Platform without becoming a Member you are categorized as a User. The only personal data

collected from User's are explained the in the Section titled "Cookie Policy" below.

- 4.2.3. Naturally, we collect more personal data from you when you sign up to the Platform as a Member. As a Member you provide more personal data including:
 - 4.2.3.1. contact information such as your username, email address;
 - 4.2.3.2. user picture or "avatar" (in case it contains your personally identifiable information);
 - 4.2.3.3. details of your correspondence with us;
 - 4.2.3.4. technical information, such as your Internet Protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, screen resolution, time zone setting, browser plug-in types and versions, operating system, platform and traffic data, cookies data, web logs and other communication data, and details of the resources that you access, as well as your sessions records, which we collect from you when you access the Platform;
 - 4.2.3.5. membership financial information, such as the payment plan chosen for membership and any due or upcoming payment (debt) information;
 - 4.2.3.6. Photographs which may contain personal data as well as any location data which you choose to upload to the Platform; and
 - 4.2.3.7. any other information you provide to us.
- 4.2.4. For more detail on the personal data we process, please see Article 12 titled "Notice For California Residents; Categories Of Personal Data Processed" below.
- 4.2.5. When you use your membership and account information with third party service providers, we will receive certain profile information about you from your service provider. The profile information we receive may vary depending on the provider concerned, but will often include your name, email address, and profile picture as well as other information you choose to make public on such service provider platform. We will use the information we receive only for the purposes that are described in this Privacy Policy or that are otherwise made clear to you on our Platform. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy policies to understand how they collect, use and share your personal data, and how you can set your privacy preferences on their sites and apps. As of the entry into force of this Privacy Policy, for Members using Android devices, our Platform offers you the ability to register and login using your Google account.
- 4.2.6. For registering as a Member on our platform, the provision of a username, email (which may contain your first and/or last name,) and password is mandatory: if relevant data is not provided, then you will not be able to create an account. Alternatively, you may login using third party service providers as

explained above. **All other provisions of your identifier information** (real name, alias or user name, postal address, telephone or mobile contact number, job title, company name, profile picture) **are optional. For example, if you do not provide us with your phone number, we would not be able to call you to provide you with more information about the products you may be interested in.**

4.3. **You are able to view and update much of the information collected about you through your account settings. Please note that if you sign in using a third-party service provider, we cannot allow you to change your email address information. You shall be entitled to collect all of your personal data stored on the Platform upon request via the sections provided on the applications or via e-mail to us at privacy@pintraveler.net**

4.4. **For subscribing to any of our paid Services, please note that Pin Traveler only accepts payment through third party service providers such as Google Play or App Store. When you make payments using these third-party service providers, only limited information which confirms payment is shared with Pin Traveler and your financial information such as credit card number is NOT made available to Pin Traveler.** We highly recommend that you review their privacy policies to understand how they collect, use and share your personal data, and how you can set your privacy preferences on their sites and apps.

4.4.1. We automatically collect certain information when you visit, use or navigate the Platform. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Platform and other technical information which may lead to your identification. This information is primarily needed to maintain the security and operation of our Platform, and for our internal analytics and reporting purposes. Please refer to section titled "Cookie Policy" and the sub-section titled "Service Providers Processing Data on Our Behalf" for more information on automatically collected personal data.

4.4.2. As a Member, please remember that if you use the Platform to share personal data of persons who are not Members themselves (e.g. photographs, name, etc.), you represent that you have read and understood the Terms of Use and agree to be bound by the conditions thereto. In these instances, you further represent that the individuals to whom this data relates have been informed of and have consented to such use and disclosure.

4.4.3. When this product/service was designed, the possibility that it would be used to process special categories of personal data or data regarding criminal convictions and offences was not taken into account. In fact, our Terms of Use specifically state that Members shall not use the Platform for any purpose or in

any manner involving transmitting protected health information using Pin Traveler unless you have received prior written consent to such use from Pin Traveler.

- 4.4.4. Our Platform is intended for the use of adults only. We do not knowingly collect personal information from children or minors. If Pin Traveler is made aware that a child has provided us with personal information without parental consent, we will endeavor to delete that information from our databases. If you have questions about personal information that may have been submitted by a child, please email us at privacy@pintraveler.net.

4.5. Why Do We Use Your Data?

- 4.5.1. Service provision: we use the information to carry out and administer the platform which enables you as Members to load, store and share travel information, photographs, location, and other data related to their past, current and future travels.. For the purpose of service provision, we use your personal information to manage your account, to provide the Services, to maintain our customer/visitor lists, to respond to your inquiries or provide feedback, for identification and authentication purposes, for service improvement, and to address issues such as malicious use of the Services.
 - 4.5.2. Communication: sending emails, newsletters, and other messages to keep you informed of the Platform. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link. We also use the personal data to deal with inquiries and complaints made by you relating to the Platform and to address your questions, issues, and concerns;
 - 4.5.3. Platform monitoring: to check the Platform and our other technology services are being used appropriately and to optimize their functionality for the purpose of administering and improving our Services.
 - 4.5.4. Platform optimization: improve, test, and monitor the effectiveness of our Platform and diagnose or fix technology problems;
 - 4.5.5. Managing suppliers: we use information to manage suppliers who deliver services to us;
 - 4.5.6. Easy access: to help you efficiently access your information after you sign in and to remember information so you will not have to re-enter it during your visit or the next time you visit the Platform;
 - 4.5.7. Statistics: monitor metrics such as total number of visitors, traffic, demographic patterns, and patterns in our test results (on an anonymized and aggregated basis);
 - 4.5.8. Development: develop and test new products and features.
- 4.6. If we plan to use your personal data in the future for any other purposes not identified above, we will only do so after informing you by updating this Privacy

Policy. See further the section of this Privacy Policy entitled “Updates to the Privacy Policy”.

5. COOKIE POLICY

- 5.1. We use cookies on our website to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve the Site.
- 5.2. A cookie is a commonly used automated data collection tool. Cookies are small text files that are placed on your computer or device by websites that you visit or HTML-formatted emails you open, in order to make websites work, or work more efficiently, as well as to provide information to the owners of the Site.
- 5.3. We use persistent cookies to save your login information for future logins to the Site. We use session cookies to enable certain features of the Site, to better understand how you interact with the Site and to monitor aggregate usage by users and web traffic routing on the Site. Unlike persistent cookies, session cookies are deleted from your computer when you log off from the Site and then close your browser. We may also use advertising cookies which enables our advertising service providers to collect some data regarding your device in order to be able to determine your interests and provide targeted advertising services. Details of the cookies used on our website are set out in our cookie policy available at <https://pintraveler.net/cookies>. Please be advised that our cookie policy is an integral part of this Privacy Policy.
- 5.4. You can set up your browser options, to stop your computer accepting cookies or to prompt you before accepting a cookie from the websites you visit. If you do not accept cookies, however, you may be unable to access certain parts of our Site or to receive certain Services.
- 5.5. Your browser may feature a preference which alerts websites you visit that you do not want them to collect certain information about you. This is referred to as a Do-Not-Track (“DNT”) signal. Please note that our Site may not recognize or take action in response to DNT signals from your browser.

6. WHERE WE STORE YOUR DATA

- 6.1. Pin Traveler is hosted, stored and processed by Pin Traveler’s sub-processor, Google Cloud Platform, leveraging Google Cloud Platform data centers which are (unless otherwise stated) located within the continental United States. Processing of the information collected about you is only undertaken for the purposes described in this Privacy Policy.

- 6.2. For Members located in Europe, we would like to expressly state that the personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") or the UK. It may also be processed by staff operating outside the EEA or the UK who work for us or for one of our suppliers or partners. Such staff or subcontractors maybe engaged in, among other things, the processing of your payment details or the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing outside of the USA, EEA or the UK.
- 6.3. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. In particular, this means that your personal data will only be transferred where the recipient is bound by contractual clauses requiring the confidentiality and protection of personal data.
- 6.4. Our Platform is accessible via the internet and may potentially be accessed by anyone around the world. Other users may access the Platform from outside the EEA or the UK. This means that where you chose to post your data on our Platform, it could be accessed from anywhere around the world and therefore a transfer of your data outside of the EEA or the UK may be deemed to have occurred. You consent to such transfer of your data for and by way of this purpose.

7. DISCLOSURE OF YOUR PERSONAL DATA

7.1. We do not sell, lease, rent or give away the information collected about you without your permission. We only disclose your information as described below. If we disclose your information, we require those we share it with to comply with adequate privacy and confidentiality requirements, and security standards.

7.2. We may disclose your personal data to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact, or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the Services, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. We may disclose personal data when we believe in good faith that such disclosure is required by and in accordance with the law. In certain instances, it may be necessary for Pin Traveler to disclose the information that we've collected about you to government officials or otherwise as required by applicable law. No personal data will be disclosed to any law enforcement agency or governmental agency except in response to:

7.2.1. A subpoena, warrant or other process issued by a court of competent jurisdiction;

7.2.2. A legal process having the same consequence as a court-issued request for information, in that if Pin Traveler were to refuse to provide such information, it would be in breach of local law, and it or its officers, executives or employees would be subject to liability for failing to honor such legal process; or

7.2.3. Where such disclosure is necessary for Pin Traveler to enforce its legal rights pursuant to the laws of the jurisdiction from which such information was gathered.

7.3. We may also disclose your personal data, subject to appropriate confidentiality protections, in connection with a corporate re-organization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

7.4. The Platform may contain links to third party websites. When you click on a link to any other website or location, you will go to another site, and another entity may collect personal or anonymous data from you. We have no control over, do not review, and cannot be responsible for these outside websites or their content. Please be aware that this Privacy Policy does not apply to these outside websites or content, or to any collection of your personal data after you click on links to such outside websites. We encourage you to read the privacy policies of every website you visit. The links to third party websites or locations are for your convenience and do not signify our endorsement of such third parties or their products, content, or websites.

7.5. Service Providers Processing Data on Our Behalf

7.5.1. We may use contractors and service providers to process the information collected about you on our behalf for the purposes described in this Privacy Policy. We contractually require service providers to keep information secure and confidential and we do not allow our data processors to disclose your information to others without our authorization, or to use it for their own purposes. However, if you have an independent relationship with these service providers their privacy statements will apply. Please also see Article 6 above for information on where we store your data as it may contain information on service providers.

7.5.2. **Google Analytics (Google LLC.):** This third-party service enables Pin Traveler to monitor and analyze the Site traffic. Google Analytics is a web analysis service provided by Google LLC. Google utilizes the information collected to track and examine the use of the Site to prepare reports that may be used for optimization of the Site. Information collected for this purpose is cookies and usage data. Place of processing of Google LLC is the US. Please check the Google privacy policy at <https://policies.google.com/privacy?hl=en> for more information. Opt-out option is also available as a browser add-on at: <https://support.google.com/analytics/answer/181881?hl=en>

7.5.3. **Google Ads (Google LLC.):** This third-party service enables Pin Traveler to display advertisements on its mobile application as well as web site. Regarding the website, advertising cookies and your options on enabling them are

explained in our cookie policy available at <https://pintraveler.net/cookies>. For our mobile application, please note that the information collected for the purposes of targeted advertising is determined by the service provider. Therefore, we refer you to the privacy policies of our service provider available at <https://support.google.com/adspolicy/>.

7.5.4. Play Store (Google LLC.): Our Platform is available for download on the Play Store. Any purchases made by Members may be made through the Play Store as a service provider. Please note that the information collected for the purposes of payment is determined by the service provider. Therefore, we refer you to the privacy policies of our service provider available at https://payments.google.com/payments/apis-secure/u/0/get_legal_document?ldo=0&ldt=privacynotice.

7.5.5. App Store (Apple, INC.): Our Platform is available for download on the App Store. Any purchases made by Members may be made through the App Store as a service provider. Please note that the information collected for the purposes of payment is determined by the service provider. Therefore, we refer you to the privacy policies of our service provider available at <https://www.apple.com/legal/privacy/data/en/app-store/> and <https://support.apple.com/en-us/HT207233>.

8. RETENTION OF YOUR PERSONAL DATA

- 8.1. We will retain your personal data for as long as needed to fulfill the purpose for which we collected it and for a reasonable period thereafter in order to comply with audit, contractual, or legal requirements, or where we have a legitimate interest in doing so. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
- 8.2. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.
- 8.3. We may retain aggregated or de-identified data indefinitely or to the extent allowed by applicable law. We may retain personal data preserved in automatically generated computer back up or archival copies generated in the ordinary course of our information technology systems procedures.
- 8.4. All retained personal data will remain subject to the terms of this Privacy Policy. Please note that if you request that your personal data be removed from our databases, it may not be possible to completely delete all of your personal data due to technological or legal constraints, though we will use reasonable efforts to do so.

- 8.5. No purpose in this notice will require us keeping your personal information for longer than twelve (12) months past the termination of the member's account, unless as necessary to comply with our legal obligations, resolve disputes, prevent and detect fraud, and enforce our agreements.

9. SECURITY POLICY

- 9.1. The security of your personal data is important to us. We use commercially reasonable efforts to store and maintain your personal data in a secure environment. We also take technical, contractual, administrative, and physical security steps designed to protect any and all personal data you provide. We have implemented procedures designed to limit the dissemination of your personal data to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you in this Privacy Policy.
- 9.2. Please note that you are also responsible for helping to protect the security of your personal data. For instance, never give out the credentials you use in connection with accessing the Platform, so that other people will not have access to your personal data. Furthermore, you are responsible for maintaining the security of any personal computing device on which you utilize the Services. We provide e-mail verification upon membership sign up and enable sign in only through the use of your password.
- 9.3. We are not liable for disclosure of data due to errors in transmission, unauthorized access or acts by third parties, or omissions or acts beyond our reasonable control. Although we employ commercially reasonable measures of security, we also cannot guarantee that your personal data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards by persons or systems with malicious intent.
- 9.4. In the event we become aware of a security breach that could result in your personal data being disclosed in a manner that is not authorized under this Privacy Policy, we will notify you via e-mail (or other communication channel you have provided to us) if we can and use other means (such as posting a notice on our Platform) to try to alert you as appropriate.
- 9.5. We have implemented the following security measures to protect its product or service:
 - 9.5.1. The data centers, where Pin Traveler has servers, are equipped with camera surveillance and visitor registration systems and are ISO:27001:2013 certified. Please be advised that unless otherwise stated, the Platform and all its contents (including any content generated by Member applications) is hosted in servers located primarily in the United States of America. If you access the Platform from any other region of the world with laws or other requirements governing personal data collection, use, or disclosure that differ from applicable laws

in the United States of America, then through your continued use of the Platform, you are transferring your data to the United States of America, and you agree to have your data transferred to and processed in the United States of America. Please be advised that Pin Traveler may also store data in reputable third-party data centers in different locations around the world, and this provision shall apply equally if your data is stored in such data centers. If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these locations/countries where Pin Traveler stores data may not necessarily have data protection laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

- 9.5.2. The (database) servers can be accessed only via Pin Traveler's trusted network locations.
 - 9.5.3. Procedures are in place, which means only authorized personnel have access to the personal data. A non-disclosure and confidentiality agreement ensures this still applies when a member of staff leaves the company.
 - 9.5.4. All mobile carriers (such as laptops, USB sticks and portable HDs) of Pin Traveler are encrypted.
 - 9.5.5. Our web servers and database servers are firewall-protected.
 - 9.5.6. All data within Pin Traveler will be stored as securely as possible.
 - 9.5.7. Encryption will be used when possible.
 - 9.5.8. All data will be transmitted with the highest possible form of encryption that is supported.
- 9.6. We regularly revise the security measures outlined in this Privacy Policy to ensure that we are always fully prepared and up to date with regard to data protection.

10. MANAGING YOUR PIN TRAVELER MEMBER STATUS AND ACCOUNT

- 10.1. **Username:** Pin Traveler Members are required to assign themselves a username that uniquely identifies you on Pin Traveler. Your username may contain personal data such as your real name, surname or other identifier. You can change your Pin Traveler username at any time. However, please beware that if you change your username, your old username becomes available for anyone else to claim. Most references to your Member profile under the old username automatically change to the new username.
- 10.2. **Profile Picture:** You have the option to upload a profile picture under the "Profile" tab on the Platform. Depending on the picture that you use, the profile picture may contain personal and/or sensitive personal data. Please be advised that your profile

picture shall be visible to other Members of the Platform when they search you on the Platform.

- 10.3. **Email address:** Unless they are using third party service providers for sign up and login, Pin Traveler Members are required to give an email address. Pin Traveler sends e-mail verification requests to this address to secure your personal data. You can change your email information only after you have verified the last email given.
- 10.4. **Deactivating Your Account:** Deactivating your account will stop all services you receive on the Platform. However, all the data you have uploaded to the Platform, including e-mail, travel information, photographs, etc. will be kept intact. After deactivation, you will automatically signed out from all your sessions and you will not be able to sign in again to your account until you reactivate it again during sign in.
- 10.5. **Deleting Your Account:** Deleting your account will stop all services you receive on the Platform, permanently delete all the data you have uploaded to the Platform, including e-mail, travel information, photographs, etc and profile information. However, please be aware that due to your interactions with other Members on the Platform, some information, like messages you sent to other Members and comments you have added to their photographs, may still be visible after you delete your account. Once you delete your account, there is no going back. Please be certain. We will be sorry to lose you.
- 10.6. **Sharing With Other Members:** Activating the share feature on your account will enable sharing your account information including all or particular location information with other Members. Please be advised that when you share your account with other Members, all your data, including any photographs you may have added to any Pin shall be shared with other Members. You may choose to block access of individual members to your data. You are also able to choose whether or not to share such information or to stop sharing when you wish. For the avoidance of doubt, you may not use any personal data provided by another Member and accessible by you for any purpose without the express consent of the relevant Member.

11. DATA LEAK PROTOCOL

- 11.1. In the unfortunate event that something does go wrong, Pin Traveler will follow the following data breach protocol to ensure that data subjects are notified of incidents.
- 11.2. A relevant internal data breach procedure is in place. Pin Traveler will set up a team in order to analyze the cause, the impact and the affected Members and Users. Depending on the outcome of this analysis, Members/Users will be notified as soon as possible. Members shall be notified within 24 hours of Pin Traveler's learning of

the data leak if possible. If required by any applicable law, Pin Traveler shall also notify any applicable Data Protection Authority about the leak.

11.3. Pin Traveler will provide highly detailed information about:

11.3.1. The nature of the breach, including a description of the incident, the nature of the personal data or categories of affected data subjects, an estimate of the number of affected data subjects and databases that may be affected, as well as an indication of when the incident occurred;

11.3.2. Any measures already taken by Pin Traveler in order to stop the breach;

11.3.3. Any measures to be taken by the affected data subjects (what can the affected data subjects themselves do, such as “keep an eye on your e-mails, change your passwords”, etc.);

11.3.4. Any measures to be taken by Pin Traveler in order to prevent a future breach.

12. NOTICE FOR CALIFORNIA RESIDENTS; CATEGORIES OF PERSONAL DATA PROCESSED

12.1. Please note that this notice for residents of the State of California is provided for the ease of said persons; however, the other provisions of this Privacy Policy are equally valid and in force for residents of the State of California.

12.2. Please refer to Article 14 below for more information regarding your rights regarding the personal information processed and how to pose questions or requests to us regarding your personal information.

12.3. The chart below includes details on personal data or “personal information” collected for customers. Within the last twelve (12) months, we may have collected the following categories of personal information from the sources identified below for the business and commercial purposes indicated, and disclosed, shared, or sold (as indicated) such categories of personal information with the specified categories of third parties:

Category of Personal Information	Examples of Personal Information Collected by Pin Traveler	Categories of Sources of Personal Information Collected	Business or Commercial Purpose(s) for Which Collected, or Disclosed	Categories of Third Parties to Which Personal Information is Disclosed
Identifiers	A real name, username or alias, unique personal identifier, online identifier, postal address, Internet Protocol address, email	Directly from you. Third party service providers which you use to	To provide products, services and access to our websites, mobile applications, and	Affiliates. Service Providers. Government Entities if required

	address, account name or other similar identifiers.	sign up or log in to your account. (“Service Providers”).	other communication systems and to communicate with you about our products and services.	under the applicable law.
Personal Information Categories Listed in the California Customer Records statute (Cal. Civ. Code 1798.80(e))	Name, signature, physical characteristics or description, address, telephone number, credit card number, debit card number, or any other financial information.	Directly from you. From Affiliates. From Service Providers.	To improve service and provide targeted customer experiences and service offerings. To provide products, services and access to our websites, mobile applications, and other communication systems and to communicate with you about our products and services. For payment and other authentication purposes.	Affiliates. Service Providers. Government Entities if required under the applicable law.
Characteristics of protected classifications under California or federal law	Pin Traveler does not require disclosure of such information from you and the processing of this type of data is not the primary feature or function of the services provided by Pin Traveler. However, you may choose to share such Personal Information directly or indirectly on Pin Traveler (e.g. by uploading, storing	Directly from you.	We do not intend to process this category of information and only do so upon the upload, storage, sharing of such information by Members on the Pin Traveler Platform as part of our	Affiliates. Service Providers. Government Entities if required under the applicable law.

	<p>and/or sharing photographs containing such information).</p> <p>For the avoidance of doubt, examples of characteristic of protected classifications under California or federal law include race, color, age, ethnicity, national origin, citizenship, religion or creed, marital status, medical condition, gender, veteran, military status, or other similar information.</p>		continued provision of such services.	
Commercial Information	Products or services purchased, obtained, or considered, or other purchasing histories or tendencies.	<p>Directly from you.</p> <p>From Affiliates.</p> <p>From Service Providers.</p>	To improve service and provide targeted customer experiences and service offerings.	<p>Affiliates.</p> <p>Service Providers.</p> <p>Government Entities if required under the applicable law.</p>
Biometric Information or Genetic Data	We do not collect this category of information.			
Internet or other electronic network activity information	Browsing history, search history, and interaction with Web sites, apps & ads, and other similar information.	<p>Directly from you.</p> <p>From Affiliates.</p> <p>From Service Providers.</p>	To provide targeted customer experience and service offerings. For security and operations purposes related to the safety and functionality of our information systems.	<p>Affiliates.</p> <p>Service Providers.</p> <p>Government Entities if required under the applicable law.</p>
Geolocation data	Physical location and/or movements and similar information.	<p>Directly from you.</p> <p>From Affiliates.</p> <p>From Service Providers.</p>	For purposes of service verification and other operational and contractual	<p>Affiliates.</p> <p>Service Providers.</p> <p>Government Entities if required</p>

			compliance purposes.	under the applicable law.
Sensory Data	Includes audio, electronic, visual, or similar information such as photographs and images (e.g., that you provide us) and call/video recordings (e.g., of customer support calls).	Directly from you. From Affiliates. From Service Providers.	Quality control; compliance, job performance assessment; internal communications, training and information sharing. To provide and improve services, for service verification, safety, quality control and compliance.	Affiliates. Service Providers. Government Entities if required under the applicable law.
Professional or employment related information	We do not collect this category of information.			
Non-public education information	We do not collect this category of information. (For the avoidance of doubt non-public education information is defined in the Family Educational Rights and Privacy Act (20 U.S.C. 1232g, 34 C.F.R. Part 99))			
Inferences drawn from other personal information	We do not collect this category of information.			
Sensitive Personal Information	Pin Traveler does not require disclosure of such information from you and the processing of this type of data is not the primary feature or function of the services provided by Pin Traveler. However, you may choose to share such	Directly from you.	We do not intend to process this category of information and only do so upon the upload, storage, sharing of such information by Members on the Pin	Affiliates. Service Providers. Government Entities if required under the applicable law.

	<p>Personal Information directly or indirectly on Pin Traveler (e.g. by uploading, storing and/or sharing photographs containing such information).</p> <p>For the avoidance of doubt, examples of sensitive personal information include health information, demographic information, precise geolocation information, company electronic communications, company financial information, and government identifiers such as a social security number or driver's license number.</p>		<p>Traveler Platform as part of our continued provision of such services.</p>	
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13. UPDATES TO THE PRIVACY POLICY

13.1. We may update this Privacy Policy from time to time. The updated version will be indicated by an updated "Entry Into Force" date and the updated version will be effective as soon as it is accessible. If we make material changes to this Privacy Policy, we may notify you either by prominently posting a notice of such changes on the Platform or by directly sending you a notification through the Platform. We encourage you to review this Privacy Policy frequently to be informed of how we are protecting your personal data.

14. QUESTIONS AND REQUESTS ABOUT YOUR PERSONAL DATA ("CONSUMER REQUEST")

14.1. As a Member or User of Pin Traveler you may request the following from Pin Traveler as Data Controller;

- 14.1.1. Access to your personal data.
- 14.1.2. Rectification or deletion of your personal data.

- 14.1.3. A restriction on the processing of your personal data.
- 14.1.4. Object to the processing of your personal data.
- 14.1.5. A transfer of your personal data (data portability) in a structured, machine readable and commonly used format.
- 14.1.6. Withdraw your consent to us processing your personal data, at any time.
- 14.2. Please note that withdrawing your consent is only effective provided that consent is the only basis for the processing of relevant personal data. Similarly, even if you request the deletion of any personal data, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.
- 14.3. You can make a request in relation to any of the above rights by writing to us at the contact address given at the end of this Privacy Policy. Only you, or someone legally authorized to act on your behalf, may make a consumer request related to your personal data. You may also make a consumer request on behalf of your minor child.
- 14.4. We will respond to such queries as soon as reasonably possible and deal with requests we receive from you, in accordance with the provisions of any applicable data protection law. Please note that you also have the right to appeal our responses to your consumer requests regarding this privacy policy. You can make your appeals to us using the same contact information below.

15. CONTACT US

- 15.1. You can contact us via post or email.
 - 15.1.1. Via post:
 - Pin Traveler LLC.
 - Attn: Privacy
 - 9310 PENINSULA DR DALLAS, TX 75218-2735 USA
 - 15.1.2. Via email:
 - privacy@pintraveler.net with "Privacy" in the subject line
- 15.2. If your letter or email involves one of the requests listed above in the section titled "Questions and Requests About Your Personal Data", we may ask you to verify your identity before fulfilling your request depending on the method of your request.