

PRIVACY NOTICE

Last updated: October 2023

This Privacy Notice (the “**Notice**”) explains how we, Voyago.ai (also: “**Voyago** ” or “**we**”), collect and use your personal data when providing our services through our mobile application (“**Voyago**”), to allow you to create your personalized travel itineraries on our platform. In this Notice, our mobile application including all of the features and services are collectively referred to as the “**Services**”. This Notice also informs you about how we protect your personal data and the rights and options you have to control your data.

We advise you to read this Notice carefully and to consult it on a regular basis when you use our Services, as it may be necessary for us to amend this Notice from time to time. If we want to make substantive changes to the way we process personal data, for example if we want to collect new types of personal data or process personal data for new purposes, we will take reasonable steps to inform you in advance.

1. **WHAT PERSONAL DATA WE COLLECT**

When we talk about data or personal data in this Notice, we refer to all data that can be directly or indirectly traced back to you as an individual. Depending on how you use our Services, we collect and process data that you ask us to process or data that we otherwise collect. The categories of data we process are:

Account Data – which consists of data you provide and which we collect when you create an account on Voyago:

- Name, including your display name and login name
- Email address
- Nationality
- The expiry month and year of your ID (such as your passport)
- Travel preferences you share with us
- Logging and recovery data related to log in attempts and failures
- Data you voluntarily provide, such as your travel preferences, travel destinations and travel budget

Technical Data – which consists of data we automatically collect throughout your use of our Services:

- Device and network connection information when you access our Services, including access logs, device type, operating system, and other information provided by your device, the use you make of Voyago (including which links you click on and the time you spend using our Services and how you interact with it)

Customer Support Data – which consists of data which is required to provide you with customer support:

- Contact information, including your name and email address
- support chat history
- Information you voluntarily provide us, for example your gender and feedback

Marketing Data – which consists of data which is provided by you to us for the purpose of sending marketing materials about our products and services:

- Name

- Email address
- Social Media Profile(s)
- Marketing preferences
- Information collected and clearly identifiable to you at the point of your signing up to our marketing communications

2. **WHY WE PROCESS YOUR PERSONAL DATA**

Purpose of processing	Categories of personal data	Corresponding legal basis
Creating and managing your account	Account Data	This is necessary for us to fulfil our contract with you to create and manage your Voyago account
Developing and improving our Services	Technical Data	It is our legitimate business interest to develop and improve the delivery of our Services (including by understanding how you use the services) and to develop new services or products
To improve our Services and your experience when using our Services	Account Data Technical Data	It is our legitimate business interest to develop and improve its Services
To provide you with a personalized and tailored experience, including providing you with recommendations we think you'll like	Account Data	It is our legitimate business interest to provide you with a tailored and personal experience, including providing you with recommendations we think you'll like Where required by applicable laws we will ask your consent
To provide you with helpful and seamless customer support experience	Customer Support Data	It is our legitimate business interest to provide you with such a helpful and seamless customer support experience
To protect establish, exercise or defend our and third parties' rights, to defend against lawsuits and to detect	Account Data Technical Data	It is our legitimate business interest to protect its and third parties' rights and to detect, investigate and prevent crime and fraud within or related to

and prevent crime and fraud within our Services	Customer Support Data	our Services, and the products and services of third parties to the extent permitted by law
Providing you with marketing materials for the promotion of Voyago and our products and services	Marketing Data	It is our legitimate business interest to market our activities and promote the success of our business, mobile applications, website(s) and services. Where required by applicable laws we will ask your consent

3. WITH WHICH THIRD PARTIES WE DISCLOSE PERSONAL DATA

Where relevant and necessary, we provide personal data to the following third parties:

- Our third-party service providers who support us with providing our Services and conducting our business. This means that your personal data is processed by third party vendors for website and application development, hosting and maintenance, data hosting and cloud (storage) services, backup services, data analysis, information security services, technical infrastructure services, customer support services, and marketing services.
- Other parties with whom you choose to share your personal data with, depending on how you use our Services. For instance, social media platforms or other platforms, or our business partners.
- Public authorities, justice and law enforcement, fiscal authorities and other authorities assigned with investigative powers or public authority, to the extent we are legally required or have legitimate interests to do so.
- With professional advisors, investigators, or credit reference agencies to the extent we are legally required or have legitimate interests to establish, exercise or defend our legal rights, or prevent or detect crime and fraud.

4. COOKIES

We do not use any third party cookies in providing our Services.

5. HOW WE TRANSFER PERSONAL DATA INTERNATIONALLY

We try to process your data within the EU and UK as much as possible. Sometimes it is necessary to transfer your data outside the EU or UK to a country which does not provide for the same level of data protection as is provided in the EU and the UK, for example, if a third-party service provider is located outside Europe. When we transfer your data outside the EU or UK, we ensure that this is done in accordance with applicable data protection laws and that the protection of your data is adequately safeguarded. We do this, for example, by concluding agreements with third party service providers based on the EU or UK standard contractual

clauses for the international transfer of personal data. If you would like to receive more information on the safeguards taken, please contact us via james@voyago.ai.

6. HOW WE PROTECT AND STORE PERSONAL DATA

We have implemented physical, technical and organisational security measures to protect your personal data as required by applicable laws. These measures are aimed at ensuring the integrity and confidentiality of your personal data, for instance by ensuring that only authorised individuals have access to your personal data, and to protect it against unlawful or unauthorized destruction, loss, alteration, use or disclosure, or access. We evaluate and update these measures on a regular basis. Please be aware that no information system can be 100% secure. This means that we cannot guarantee the absolute security or availability of your personal data.

We will retain your personal data for the duration of your interaction with our Services, unless a shorter retention period is required by applicable laws or the data is no longer necessary for the purposes for which the data was obtained. Once you no longer interact with our Services, we will retain your personal data for the period of time that enables us to:

- fulfil our legal obligations, including legal retention periods;
- initiate, investigate or defend against legal claims;
- address your questions, requests or complaints; and
- keep our records for analysis and audit purposes.

7. HOW TO EXERCISE YOUR RIGHTS

We respect the rights granted to you under applicable data protection laws. Depending on your location and such applicable laws, these may include the right to access your personal data that we hold about you, to rectify or erase certain personal data, to restrict processing of your personal data and to get an electronic copy of your personal data for purposes of transmitting it to another company. These rights may be subject to certain limitations or restrictions as allowed or imposed by applicable laws, if this is the case we will let you know in our communications with you.

In addition, where we rely on our legitimate interest to process your personal data, you have the right to object to such processing, wholly or partly, on grounds related to your particular situation and in accordance with the laws applicable to you. For instance, depending on your country this may include a right to opt-out to marketing communications via an opt-out link in the respective marketing message.

Where we rely on your consent to process your personal data, you have the right to withdraw your consent at any time.

To exercise your rights, please send an email to james@voyago.ai.

You are also entitled to lodge a complaint with your local data protection authority.

8. LINKS TO OTHER SERVICES OR WEBSITES

Our Services may contain links to third party services or websites. We are not responsible for the way in which these third parties handle your personal data. We advise you to read the privacy notice of the third party when you make use of their service or visit their website in order to understand how this third party collects and uses your personal data.

9. **CONTACT DETAILS**

Voyago.ai, james@voyago.ai.

10. **ADDITIONAL U.S. STATE DISCLOSURES**

This section provides information required under various U.S. state privacy laws about how we handle certain personal information we have collected, used, and disclosed and certain rights under applicable state law. These provisions supplement the other sections in this Notice.

10.1 Your Privacy Rights

To the extent provided for by law and subject to applicable exceptions, individuals may have the following rights concerning their personal data:

- The right to know information about our processing of your personal information, including the specific pieces of personal information that we have collected from you;
- The right to request deletion of your personal information;
- The right to correct your personal information; and
- The right to be free from discrimination relating to the exercise of any of your privacy rights.

10.2 Exercising Your Rights

You may submit requests to know, delete, or correct by contacting us using the contact information provided above. To exercise your rights, please send an email to james@voyago.ai. Please include the phrase "Personal Information Privacy Request" in the subject line, and specify the Service you are inquiring about, along with your name, address, and email address. To protect your personal data from unauthorized access, change, or deletion, we will further verify and respond to your request consistent with applicable law, taking into account the type and sensitivity of the personal information subject to the request. We may need to request additional personal information from you to protect against fraudulent or spoofed requests.

10.3 Authorized Agents

Authorized agents wishing to exercise rights on behalf of an individual may use the submission method noted above. We will honor a request from an authorized agent provided that (i) the individual provides written authorization to the authorized agent to act on their behalf and we can verify their identity, and (ii) the agent submits proof of authorization.

10.4 Appeals

You may also have a right to appeal a decision we make relating to requests to exercise your rights under applicable local law. To appeal a decision, please contact us via james@voyago.ai and include the phrase "Personal Information Appeal Request" in the subject line.