#### PRIVACY POLICY

#### (document version after 17.07.2020)

Your privacy is important to us. This privacy statement explains:

What personal data are collected by the Owner of this Website or provided by you, through our interactions with you and your use of our Website: <u>https://newsroom.aviasales.com/</u> (apps and software, hereinafter «Website»);

How your personal data will be used, where it will be held, how long it will be kept and your rights.

This Privacy Policy describes our use of Personal identifiable and non-identifiable Information that we collect when you visit or use the Website.

**This Privacy Policy does not apply to** the use of your Personal Information that is collected by third parties that we do not own or control or that do not support.

Please read this privacy policy carefully.

#### **DEFINITIONS AND INTERPRETATION**

In this privacy, the following definitions are used:

- **Data controller** means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed;
- **Data processor**, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.
- «You», «your» or **«data subject»** means:
  - (i) Visitors of our Website;
  - (ii) Subscribers to any service we offer through our Website;
  - (iii) Users of our applications;
  - (iv) Prospective or existing clients corresponding with us by phone, e-mail or otherwise.
- Data controller, «we», «us» and «our» means: Go Travel Un Limited, registered as a legal entity under the legislation of the Special administrative region of Hong Kong 18.08.2011, registration number 1658681, address: room 1504, 15/F, Chinachem Tower, 34–37 Connaught road Central, Hong Kong its subsidiaries and its data processors;
- **Personal data means** any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organizations collect information about people. The definition incorporates, where applicable, the definitions provided in General Data Protection Regulation.

### CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this Privacy Policy from time to time. Please review this policy periodically for changes. If you do not accept the amended Policy, please stop using this Website.

# WHO WE ARE (IDENTITY OF THE DATA CONTROLLER)

Go Travel Un Limited, a Hong Kong Corporation, number 1658681, having its registered office at Suite 1504, 15/F, Chinachem Tower, 34–37 Connaught Rd Central, Hong Kong doing business as Aviasales, its subsidiaries and its data processors (collectively referred to as Aviasales), who operate a number of web sites;

#### PERSONAL DATA WE MAY COLLECT FROM YOU

We may collect and process the following data and personal information about you:

(i) email address,

And other applicable Personal Data which are provided to us by you voluntarily.

This Personal data are collected only to fulfill the following purposes:

(i) to enable the provision of functionality of Website;

(ii) for correspondence and contacting with you;

(iii) for updates and news including marketing information concerning travel-market and Aviasales.

Your Personal data are not transmitted to third parties for any other purposes than those stated above and in automatic processing section.

We may retain your Personal data for as long as it is needed to fulfill the purposes of processing. You have right to revoke your consent to processing (including collection and storage) of your Personal data at any time by giving such revocation at <u>help@aviasales.ru</u>.

You are entitled to demand us to perform any other legal actions with your Personal data in accordance with the applicable law, including, without limitation right to be informed about how your Personal data are processed, right to access information held about you, right to erasure (delete or remove) your

Personal data, right to restrict (block) processing, right to data portability, rights related to automated decision making.

# CHILDREN

We do not offer any products or services for purchase by children. If you are under 16, you may use our Website only with the involvement of your holder of parental responsibility. We do not knowingly collect personal information from children below 16 without the consent of the child's holder of parental responsibility.

# INFORMATION YOU PROVIDE ABOUT OTHERS

In providing personal data about other individuals (such as someone in whose name you are subscribing to our marketing promotions), you represent that you have notified them of

- (i) the purposes for which information will be used
- (ii) the recipients of their personal data and
- (iii) how they can access and correct the information.

You further represent that You have obtained all necessary consents from them.

# INFORMATION WHICH MAY BE MADE AVAILABLE TO US, OR COLLECTED AUTOMATICALLY WITH THE USE OF ANALYTIC TOOLS

We might get some information from our visitors by recording how they interact with our Website with the use of analytics tools or obtain data from third parties to improve our Website and its subsequent user experience.

Technical information, including personally identifiable information:

(i) Device and connectivity information such as IP (Internet Protocol) address, unique device identifiers (such as the IMEI for phones), the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting «Device Information»;

(ii) Log information, such as error reports, download errors, any problems you experience using our Website.

We do not match information collected automatically through analytics tools with other personally identifiable information you may have provided to us when you submitted a form through our Website.