GDPR Privacy Policy Communication for Customers

Cookies	**iHotelier:** For those customers who enable location-based or currency-based promotions (and require the end-user to consent to receiving those promotions), a cookie is dropped on the end user's browser so that when the user completes the booking, the correct promotional pricing is provided. This cookie active for 30 days so that the user is not asked to consent again while the cookie is active and that the meta data about the consent (exact wording of the agreed upon consent and time and date stamp) can be stored when the user books a room.
	GMS: The following cookies or tokens are dropped by the Guest Management Solutions product: Employee Login Status Cookies. This is a session-based cookie that tracks the Customer's employees (hotel employees) logged in status and expires with the browser session (though expunged from the server after 30 minutes of inactivity). End User Login Status Tracking. This is a token used by the TravelClick loyalty API for tracking an end-user's logged in status. Does not contain any personally identifiable information and expires after 45 minutes from last issue. Clickstream Marketing Tracking Cookie. This is a cookie dropped on hotel websites & booking engines (that are receiving Clickstream marketing services) to track marketing email click-throughs and to optionally tag known end users who made specific page visits and/or for remarketing to booking abandonments. This cookie expires after one year.
	Media: These are cookies that are dropped on a Customer's website through a tag manager implementation. This tag is generated through the advertising platforms used for the applicable media network, e.g., Google. These cookies contain information about the users' browser such aspreferences, browser type, location, IP and language. This information is used to deliver advertisements to the user on other websites within a media network. Depending on the settings of the advertising campaign and the strategy in place, the cookie duration might vary from 2 to 45 days. After this period, the cookie expires.
	Meta: These are cookies dropped on end user's browser to track attribution of a booking on a meta site such as Kayak. These cookies contain information related to the booking. For

example, search cookies collect check-in date, check-out date, purchase currency, hotel property, # rooms, Property ID, # of travelers). Once an end user hits a pixel (i.e. search pixel) that has been placed on a webpage, a cookie is dropped on the browser of that end user.

Website:
1- Required cookies

These cookies enable core site functionality and are automatically enabled when you use the site. Without them, services that you've asked for can't be provided. Examples:
- Server cookie (BIGipServerpool_htb-clusterX)
- Toolbox login status cookie (CONDORSESSIONID and toolboxBarPosition)
- Cookie banner (useCookies and useCookiesCounter)

2- Performance cookies

These cookies are used to monitor the use of your website. They help you understand how people are interacting with your website. Examples:

- Google Analytics (_ga, _gid, _gat, _gac, __utmX):
    o _ga (expiration time: 2 years) - Used to distinguish users
    o _gid (expiration time: 24 hours) - Used to distinguish users
    o _gat (expiration time: 1 minute) - Used to throttle request rate
    o _gac_<property-id> (expiration time: 90 days) - Contains campaign related information for the user. If you have linked your Google Analytics and AdWords accounts, AdWords website conversion tags will read this cookie unless you opt-out
    o _utma (expiration time: 2 years from set/update) - Used to distinguish users and sessions
    o _utmt (expiration time: 10 minutes)   - Used to throttle request rate

	_utmb (expiration time: 30 mins from set/update) - Used to determine new sessions/visits __utmz (expiration time: 6 months from set/update) - Stores the traffic source or campaign that explains how the user reached your site __utmv (expiration time: 2 years from set/update) - Used to store visitor-level custom variable data - Hotjar - Piwik 3- Advertising and Third-party cookies These cookies are used by TravelClick and third parties to show other content that is relevant to the visitor's interest, and to measure the effectiveness of online marketing campaigns on your site. Examples: - Google DoubleClick - Google Maps - AddThis - Triptease - SaleCycle
Locations and Names of Database Centers and Vendors	**Main Data Centers** CyrusOne (Lombard, IL) Quality Technology Services (Atlanta, GA) Offsite Storage of Data Tapes: Iron Mountain (Atlanta) 1725 Young Court, Norcross, GA 30093 Vanguard (Lombard 3431 Powell Street Franklin Park, Il 60131
Subcontractors (sub-processors)	IGT

	Cybage
	Pythian
Catagories of PII Collected	guestid email title lastname firstname initial_ address1 address2 city state statecode country countrycode zip b_address1 b_address2 b_city b_state b_statecode b_country b_countrycode b_zip phoneday phoneevening fax rawstreetaddr lastupdate users unsubscribe gsource groupconame birth_date corpid frequent_guestid lastccno contacttitle contactfirstname contactlastname contactemail

	airtravelerid cartravelerid
Transfers to Countries Outside of EU - **How is data protected?** - **Safeguards?**	TravelClick executes agreements with all of its customers containing the Standard Contractual Clauses.
Retention Policy	iHotelier: The default is 60 days post "date of stay" unless specified otherwise by hotel. GMS: Customer uses deletion utility to determine length of retention. Back-up of servers and tapes: offsite retention is 15 months. After, tapes are brought back in from offsite and overwritten
Info Sec Processes and Incident Response - Overview of processes and reporting re: data breach - SLA for reporting the breach.	TravelClick has detailed policies and procedures for Incident Response and other standard processes. Our SLA for reporting breaches is customers impacted by the breach would be notified within 72 hours of confirmation.