

Privacy & Data Protection Policy

PRIVACY & DATA PROTECTION POLICY

This Privacy & Data Protection Policy sets out the basis upon which Sojourner and our associated companies (collectively referred to herein as "the Companies", "us", "we" or "our") may collect, use, disclose, transfer and store your Personal Information (as defined below) in compliance with the provisions of the Personal Data Protection Act 2012 of Singapore ("PDPA"). We are committed to protecting your privacy

This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes

You agree and consent to us as well as to our service providers and third parties to collect, use, disclose and retain your personal data in the manner set forth in this policy. This Privacy & Data Protection Policy supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any right that we may have at law in connection with the collection, use, disclosure and/or retention of your Personal Data.

From time to time, we may update this Privacy & Data Protection Policy in order to be consistent with developments and regulatory changes. Should any revision(s) be made to this policy, updates will be published on our website (www.sojourner.sg). Subject to your legal rights in Singapore, the prevailing terms of this policy shall apply.

This Privacy & Data Protection Policy forms part of the terms and conditions governing your relationship with us and shall be read in conjunction with such terms and conditions ("Terms and Conditions"). In the event of any inconsistency between the provisions of the PDPA and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail.

Your Personal Information

In this Privacy & Data Protection Policy, "**Personal Information**" refers to any data and/or information about you from which you can be identified by, either (a) from that data; or (b) from that data and other information to which we may have legitimate access to. Examples of such Personal Data include but are not limited to:

a) your name, NRIC number, passport number, telephone number, postal address, email address, and any other information you may have provided us;

b) your photographs, video clips, voice recordings, and images;

c) your employment history, education background, and income history;

d) personal data of your family members, such as next of kin, spouses, and children;

e) information relating to payments, such as your bank account number or credit card information and other financial information;

f) information about your usage of and interaction with our website and/ or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic to and from our website

Collection of Personal Information

1. We may collect your personal information that you knowingly and voluntarily provide through the following ways

a) when you access to our website and perform online transactions;

b) when you make your travel reservation and booking with us either through our website or by approaching & interacting with our authorised travel agents & representatives;

c) when you purchase our goods and/or services or any other transactions that you enter into;

d) when you use the services on our website, or that is generated in the course of the use of those services;

e) when you have an inquiry and you request that we contact you;

f) when you respond to our request for additional personal information;

g) when you subscribe to our email notifications and/or newsletters;

h) when you respond to our initiatives or promotions or participate in our surveys and contest;

- i) when you submit your feedbacks, testimonials, reviews which may include photographs and videos of the trips which you have booked with us;
- j) when you submit your personal information for our recruitment purposes or when you are under our employment; and
- k) when you submit your personal information for any other reason.

2. Personal Information Relating to Another Person

When you make a reservation with us on behalf of a travel companion or another person who is not related to you, whereby you are not acting in a personal or domestic capacity, you should obtain the consent of such other individuals prior to providing their Personal Information to us. Any request to view or change their Personal Information provided in relation to the reservation which you have made can only be made through you or your account with us.

3. Surveys and Contests

We may request Personal Information relating to you through surveys or contests which we conduct from time to time. Participation in these surveys or contests is completely voluntary and you have a choice as to whether or not to provide the Personal Information we have requested through the survey or contest. Personal Information collected through surveys will be used for the purposes of monitoring or improving the use and satisfaction of our services. Personal Information collected through contests will be used to notify winners and award prizes.

4. Call Monitoring

Your telephone calls with us may be recorded or monitored for the purposes of quality control and staff training. The call recordings will be retained by us for as long as reasonably necessary and will then be deleted. Any Personal Information obtained from you during the call will be treated in accordance with the provisions of this Privacy Policy

5. Transactions by a Minor

Transactions made by any individual below the age of 18 must have a parent/guardian's consent. Subscription to the newsletter and Club registration is suitable for anyone of any age. However, we do not knowingly collect personal data from minors from any of our Platforms. Participation in contests or activities that contain monetary rewards or any form of transaction are restricted to participants who are 18 and above at the time of contest or activity.

Purposes for the Collection, Use, Disclosure & Retention of Your Personal Data

The Companies will use your Personal Information for the following purposes:

1. To perform our obligations in the course of your travel booking & reservation or in connection with the goods and/or services you have requested;
2. to verify your identity;
3. to administer our website and business;
4. to provide you with travel confirmation, notification and updates through, but not limited to emails/sms/calls;
5. to manage your account, including processing your bills and payment or credit card transactions;
6. to complete payments to 3rd party vendors for the bookings which you have made with us;
7. to communicate with you in general;
8. to respond, handle and process your queries, requests, applications, complaints, comments and feedbacks from you;
9. to allow us to contact you for customer service, if necessary;
10. to measure interest in and improve our products, services, and website;
11. to notify you about promotions and travel-related products and services that may be of interest to you;
12. to customise your experience on our website;
13. to reward you as part of any reward and recognition programme and/or competitions organised by our companies that you choose to join;
14. to resolve disputes, collect fees, or troubleshoot problems;
15. to prevent potentially prohibited or illegal activities;
16. to enforce our Terms and Conditions when you make a travel booking with us;
17. to assess and evaluate your suitability for employment or to perform the obligation in connection with your contract of employment with us;
18. to comply with any applicable laws, regulations, codes of practice, guidelines or rules or to assist in law enforcement and investigations conducted by any government and/or regulatory authority;
19. to any other incidental business purpose related to or in connection with the above as otherwise notified to you at the point of collection of your personal data.

The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you)

Credit Card Information

We may use your credit card information for the purpose of completing the travel bookings or any travel-related transactions which you make with us.

Direct Marketing

We want to make it easy for you to take advantage of travel-related opportunities with us. One way we do this is by sending marketing messages to you through email, sms, fax or post that contain information about your travel-related interests and travel-related special offers which are available with us. Please note that you can withdraw your consent for us to send marketing messages to you.

Opt-in and Opt-out Policy

We offer you the ability to opt-in to or opt-out from (as the case may be) receiving marketing messages in relation to our products and services or the products and services of third parties. If you wish to opt-out, please write to us at ask@sojourner.sg

While we respect your decision to opt out of receiving marketing information, you understand and accept that this may in some cases impact the availability of services and the quality of services that we may provide to you and may mean that the services provided to you (if possible at all) by us may not be customised for your use, may be less user-friendly and less efficient.

Disclosure of your Personal Data

1. We may disclose your Personal Information with the following 3rd parties, some of whom are located overseas, and as a result, may require us to transfer your Personal Information overseas:

- a) We may share your Personal Information to any of our employees and overseas tour operators insofar as reasonably necessary for the purposes set out in this policy.
 - b) 3rd party suppliers such as hotels, airlines, cruises and service providers, who fulfil your travel reservations with us. Please note that these 3rd party suppliers may contact you as and when necessary to obtain additional information about you in order to facilitate the travel reservation which you have made through us.
 - c) 3rd party vendors who provide services or functions on our behalf, including credit card processing, business analytics, customer service, marketing, distribution of surveys and/or contest programmes and fraud detection and prevention. We may also authorise 3rd party vendors to collect Personal Information on our behalf, including such as necessary to operate features of our Platforms or to facilitate the delivery of online advertising tailored to your interests. 3rd party vendors have access to and may collect Personal Information only as needed to perform their functions and are strictly not permitted to share or use the Personal Information for any other purposes.
 - d) Business partners with whom we may jointly offer products or services. If you choose to receive information about these products or services, we may share information about you, including your Personal Information, with those 3rd party partners so that they can contact you directly by email or post about their products and services.
2. We will only disclose your Personal Information with your consent (whether implied or expressly) and will take reasonable steps to ensure that the 3rd parties to whom we have disclosed your Personal Information and are also legally bound to protect the privacy of your Personal Information.
3. We may also disclose your Personal Information:
- a) Where disclosure is necessary to comply with applicable laws, governmental or other regulation or the requirements, orders, directions, instructions or notices of any regulatory authority or legal processes.
 - b) When we believe it is appropriate to investigate, prevent or take action regarding illegal or suspected illegal activities; to protect and defend the rights and property of the Company
 - c) Where disclosure is needed for any emergency purposes whether locally or abroad.
4. We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.

Terms Specific to Our Website

1. Cookies

- We may collect or analyse anonymised information from which individuals cannot be identified (“Aggregate Information”), such as number of users and their frequency of use, the number of page views (or page impressions) that occur on our websites and common entry and exit points into our websites.
- We make use of “cookies” to store and track Aggregate Information about you when you enter our website(s).
- Such cookies are used to track information such as the number of users and their frequency of use, profiles of users and their online preferences.
- Such aggregate Information collected may be used to assist us in analyzing the usage of our website(s) so as to improve your online experience with us
- Should you wish to disable the cookies associated with these technologies you may do so by changing the setting on your browser. However, please note that this may affect the functionality of the website(s).

2. Link to Third Party Websites

Our website may contain links to other websites of interest or websites owned or operated by third parties who offer travel-related products and services which do not operate under this Data Protection Policy.

If you decide to use those links to leave our site, note that these third party websites contain their own privacy policies and practices and their owners or operators are responsible for informing you about their privacy policies and practices.

We are not responsible for the privacy policies and practices of websites owned or operated by third parties that are linked to our website. We recommend that you examine the privacy statements of such third party websites to understand how they handle any information which they collect from you and contact its owner or operator if you have any questions or concerns about the third party website. Upon leaving our site, it is not our duty to ensure the protection and privacy of any information you provide whilst visiting such sites.

Protection of your Personal Information

We are committed to protecting your Personal Information so that you are confident in using our website and any of our platforms. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing

personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures

Contacting Us

Should you wish to withdraw your consent to our use and disclosure of your personal data or to provide more and better information or updates or corrections to ensure your personal information remains accurate, complete and current; please contact us by email at ask@sojourner.sg

The withdrawal of your consent to any or all use and disclosure of your personal data may result in us being no longer able to continue our business with you. Even without doing so, we shall cease retention of your personal data or remove the means by which the personal data can be associated with a particular individual when it is no longer necessary for any business or legal purposes.