

Last Updated: February 29, 2023

Global, Inc (“Global Travel”, “we”, “our”, or “us”), as controller of your personal data, respects your privacy and is committed to complying with this Policy, which describes how we, as a travel management and related services company, collect and use the personal data that you, the company which you are an employee of or are otherwise traveling on behalf of (“Company”), or third parties provide to us.

What is the scope of this Policy?

This Policy describes what personal data we collect about you, how we collect it, how we use it, with whom we may share it, and what choices you have regarding our use of your personal data. We also describe the measures we take to protect the security of your personal data and how to contact us.

This Policy applies to Global Travel’s business managed travel and related services, as well as business travel consulting that may be provided to you, including related services on Global Travel’s websites and applications that display or link to this Policy (hereinafter collectively, the “Services”).

We encourage you to read this Policy carefully and, in its entirety, as it relates to your rights regarding the processing of your personal data. As a user of our Services, you understand and agree that we collect, use, store, and disclose your personal data in accordance with this Policy.

Our privacy practices vary as they must amongst countries in which we may operate to reflect local legal requirements. Global Travel complies with applicable data protection laws in the jurisdictions in which it operates in its handling of personal data.

What personal data does Global Travel collect?

In the course of providing its Services, Global Travel may collect, use, store, and disclose personal data. Personal data is any information that can be used to identify you or that we can link to you. You, as traveler or user of the

Services, may be asked to provide certain personal data when you use our Services, such as:

- Names and contact information (work and home/mobile phone, fax, email, address);
- Traveler arranger and emergency contact names and information;
- Traveler preferences and trip/meeting details (e.g. routings, class of service, seat preferences, frequent flyer data, meal preferences, hotel/rail/car and other ground transportation membership data and preferences, special accommodation requests, other personal data voluntarily supplied by you via your profiles, surveys, or other requests);
- Travel documentation (e.g. passport/visa/national id/driver's license number, TSA number, citizenship, date of birth, gender);
- Payment data (corporate/personal credit cards) and bank information;
- Login credentials, user IDs, employee IDs, IP addresses, and browsing information; and
- Company identifiers (department, division, cost center).

If you submit any personal data relating to other people in connection with the Services (e.g. if you make a reservation for another individual, or provide an emergency contact), you represent that you have the authority to do so and that you have informed them we will collect, use, store, and disclose such personal data in accordance with this Policy.

How does Global Travel collect personal data?

Global Travel collects personal data:

- Directly from you when you access various parts of our Services, including when you communicate with us via email or other channels;
- From other sources, for instance, including your Company and your Company's third parties who may send us your personal data on your or your Company's behalf; and

- From the network of websites and applications accessible through or utilized by our Services and our company, including third party suppliers (e.g. airlines, hotels, payment card providers) and our Global Travel related companies, affiliates, subsidiaries, joint ventures, partners, subcontractors, and agents. This includes personal data we collect automatically through our websites and applications, for instance by using cookies and similar technologies.

How does Global Travel use personal data and on which legal bases?

Global Travel collects and uses your personal data for specified, explicit, and legitimate purposes as described in this Policy and does not process your personal data further in a manner that is incompatible with those purposes.

Global Travel uses personal data to:

- A.** Provide its Services and fulfill its obligations to your Company and travelers (e.g. complete and administer travel reservations, assist in managing the travel, provide travel based reporting and analytics, issue electronic and standard ticketing, process refunds, provide notices about your account and the Services, inform you of updates to our websites and applications, provide travel consulting services, including, but not limited to, business intelligence applied to the analysis of a Company's travel policy, sustainability engagement, and other changes to our products or Services).
- B.** Communicate with you via various multi-media channels (for instance, by email, post, phone, or Global Travel's websites or applications) and to provide you with customer service.
- C.** Understand how our websites and applications are used and provide a customized experience as you use our Services, such as by providing interactive or personalized elements on our Services and providing you with content based on your interests.

D. Fulfill a request made by you or your Company (e.g. travel based reporting, travel consulting, questions, booking requests, or other requests about your personal data). Automated decision-making may be used to process some requests to assist in delivering faster and more reliable Services to you and/or your Company (e.g. rerouting your request to the appropriate department, sending automatic replies). Important decisions will always be reviewed by a Global Travel employee.

E. Send you newsletters, marketing emails, and other information or materials that may interest you or showing personalized advertisements. Where required, we will obtain your consent before sending such marketing messages or showing personalized advertisements.

F. Conduct surveys (e.g. traveler, client satisfaction) and review the quality and performance of our services for customer satisfaction purposes.

G. Carry out our obligations and enforce your, our, or other's rights as we believe reasonably necessary (e.g. billing and collection, fraud prevention, comply with legal obligations, and respond to legal proceedings or requests from legal authorities and law enforcement or other third parties).

Who does Global Travel disclose personal data to and why?

Personal data may be collected and shared with or disclosed as required for the provision of Services to:

- Global Travel and its related companies, affiliates, subsidiaries, joint ventures, partners, subcontractors, and agents as necessary to fulfill and support the Services, including emergency bookings and assistance, ticket issuance, responding to requests, and assessing or offering promotions.
- Other companies Global Travel uses to support its business who provide ancillary services (e.g. fulfillment, surveys, storage, statistical analysis, technology, development, credit checks (as applicable)).

- Your Company for travel-based reporting, travel consulting, auditing, tracking and other purposes as necessary with your Company, including those of its personnel they request we send or make personal data available to.
- Third party service providers you or your Company request we send personal data to (e.g. providers who secure compensation for delayed, canceled, or overbooked flights on behalf of travelers; safety and tracking information providers; companies providing weather information, travel alerts, and destination content through solutions and tools; entities who collect travel information on behalf of airline carriers for the purpose of such entities forwarding it on to certain airlines for tracking of negotiated fares between airlines and your Company; successor organizations and other travel management companies).
- Third party service providers to complete travel arrangements and reservations and fulfill the Services (e.g. Global Distribution Systems (GDSs); airlines, trains, rental car and other ground transportation companies, hotels, cruise lines, destination management companies, and other related travel suppliers for booking/ticketing purposes; industry reporting authorities; equipment and technology vendors, including, without limitation, online booking tool providers, meeting registration software providers (including onsite and mobile event management solution providers), and audio visual companies; visa and passport providers; credit card companies and payment collection and processing companies).
- Other third parties as we believe is reasonably necessary in accordance with applicable laws, including laws outside your country of residence to: (i) satisfy laws, regulations, or governmental or legal requests and processes; (ii) identify, contact, or bring legal action against someone who may be violating our terms of use or policies or otherwise enforce our terms and policies; (iii) operate the Services properly; or (iv) protect Global Travel and those it serves, including pursuing available remedies or to limit damages that may be sustained (e.g. exchanging information with other companies and

organizations for the purposes of fraud protection and risk reduction).

Data consolidation companies may also be used by Global Travel or your Company for the purpose of creating reports and related statistics for benchmarking or other related purposes, including, without limitation, utilizing cumulative statistical data, which may incorporate data acquired from your Company for ordinary business purposes customary in our industry and the Services we provide, but without identifying, directly or indirectly, you or your Company.

Does Global Travel disclose personal data across borders?

Global Travel is a global company that provides travel related services and therefore, transferring your personal data internationally is necessary for the provision of our Services. When sharing with or disclosing personal data to other parties, including to Global Travel's related companies, affiliates, subsidiaries, joint ventures, partners, subcontractors, and agents who provide Services and maintain facilities, your personal data may be transferred to countries with data protection laws providing a lower standard of protection for your personal data than your country.

We will transfer your personal data in compliance with applicable data protection laws, including having adequate mechanisms in place to protect your personal data when it is transferred internationally.

How does Global Travel store and protect personal data?

Typically, Global Travel stores personal data on its servers managed internally in the United States and with third party storage providers.

Global Travel uses appropriate technical and organizational security measures to protect the personal data Global Travel holds on its network and systems from unauthorized access, disclosure, destruction, and alteration. We conduct periodic reviews of our data collection, storage,

processing, and security measures to verify we are only collecting, storing, and processing personal data that is required for our Services and to fulfill our contractual obligations. While we make every effort to protect the integrity and security of our network and systems, we cannot guarantee, ensure, or warrant that our security measures will prevent illegal or unauthorized activity related to your personal data. When using our Services, you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect your personal data, we do not warrant the security of any data and information that you transmit to us over the Internet and you do so at your own risk.

In order to protect your personal data, we kindly ask you to not send us credit card information or other similar sensitive personal data, including special categories of personal data, to us via email. We also encourage you to keep your password confidential and not disclose it to any other person. If you are sharing a computer with anyone you should log out before leaving a website or service to protect access to your password and personal data from subsequent users. Please alert us immediately if you believe your password or any of your personal data has been misused while using Global Travel's Services and applications.

How long does Global Travel keep my personal data?

Global Travel retains personal data for the period necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by applicable law. When determining how long to retain personal data, we take into account the necessity of the personal data for the provision of our Services, applicable laws and regulations, including data protection laws, and our legal obligations. We may retain records to investigate or defend against potential legal claims. When retention of the personal data is no longer necessary, the data will be deleted or anonymized.

What about Global Travel applications?

Global Travel makes available its online applications (mobile and web based) for download from various application marketplaces. Global Travel may

collect usage information for us to improve the application and to deliver a better and more personalized experience. Global Travel may track information on your use of our applications (e.g. anonymized statistics on the daily number of visitors, the daily requests for specific usage elements, tracking interest, who has posted content, the countries from which applications and Services are accessed). We use these statistics exclusively for measuring activities and for improvement or adaptation of Services for your benefit. Global Travel uses such statistics for analysis, improvement of Services, communicating findings, and product improvements for you, your Company, and other Global Travel clients and prospective clients. In accordance with applicable laws and the applications' terms of use, certain information about you (which may include your email address, itinerary data, and other information you provide voluntarily) may be shared with third parties as stated in this Policy. Please note that once you leave Global Travel websites and applications for others, including, but not limited to, virtual assistants or other applications, the privacy policies of the other websites or applications shall apply.

What about links to third party websites and services?

Our Services may contain links to third party websites. Some of these websites may allow you to purchase products and services, register to receive materials, or receive new product and service updates. In many cases, you may be asked to provide contact information such as your name, address, email address, phone number, and credit/debit card information. If you use these third-party websites and/or provide your personal data and information, the privacy policy and terms of service on those websites are applicable. We encourage you to carefully read such policies on third party websites before submitting your personal data. Global Travel is not responsible for and expressly disclaims any and all liability related to the actions of such websites, their privacy policies, or the terms and content of such websites.

Does Global Travel collect personal data of children?

Global Travel does not knowingly collect personal data from children. Individuals under 18 years of age should not use our Services to submit any personal data about themselves.

What are my rights with respect to my personal data?

You may choose what personal data (if any) you wish to provide to us. However, if you choose not to provide certain details, your experience with some or all of our Services may be affected.

How are changes to this Policy handled?

Global Travel reserves the right to revise, amend, or modify this Policy at any time and in any manner. When we post changes to this Policy, we will update the “last updated” date at the top of this Policy and we encourage you to regularly check this Policy for changes.