

STRING TRAVEL APP Privacy Policy

This is the official Privacy Policy for the mobile application STRING Travel app which is owned and operated by Pegasus Travel Management Pte Ltd (“**the Company**” or “**we**” or “**us**”).

PLEASE READ THIS PRIVACY POLICY CAREFULLY AND MAKE SURE YOU FULLY UNDERSTAND AND COMPLY WITH IT, BECAUSE IT SETS OUT THE TERMS GOVERNING THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION IN THE COURSE OF YOUR USE OF THE STRING TRAVEL APP. IF YOU DO NOT AGREE WITH ANY TERM OF THIS PRIVACY POLICY, YOU SHOULD NOT USE THE STRING TRAVEL APP. BY ACCESSING AND USING THE STRING TRAVEL APP, YOU HEREBY AGREE TO BE BOUND BY TERMS OF THIS POLICY.

1. Important information and who we are

1.1. Purpose of this Privacy Policy

This Privacy Policy aims to give you information on how the Company collects and processes your personal data through your use of the STRING Travel app.

The STRING Travel app does not offer services directed to children. Should an individual whom we know to be a child under age 13 use the STRING Travel app, we will delete or destroy their personal data as soon as reasonably possible.

It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements other notices and privacy policies and is not intended to override them.

1.2. Controller

The Company is the controller and responsible for your personal data.

We have appointed a Data Protection Officer (“**DPO**”) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise rights under this Privacy Policy, please contact the DPO using the details set out below.

1.3. Contact details

If you have any questions about this Privacy Policy or our privacy practices, please contact us at:

support@stringtravel.com (Attention: Albert Tan).

1.4. Changes to the Privacy Policy

We keep this Privacy Policy under regular review. This version was last updated on [1 August 2019].

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes and when it is no longer accurate during your relationship with us.

1.5. Third-party links

The STRING Travel app may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the STRING Travel app, we encourage you to read the privacy policy of every website you visit or application you use.

2. **Personal data collected**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes [name, username or similar identifier, date of birth and gender, country of origin.
- **Contact Data** includes [email address and telephone numbers].
- **Technical Data** includes [internet protocol (IP) address, your login data, phone type, time zone setting and location, operating system and platform, and other technology on the devices you use to access the STRING Travel app].
- **Profile Data** includes [your username and password, your interests, preferences, feedback and survey responses].
- **Usage Data** includes [information about how you use the STRING Travel app].
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences. You will receive marketing/promotional materials via electronic direct mails (“eDM”) from us and you may opt out of our mailing list within the eDMs.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific STRING Travel app feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

2.1. **Failure to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. **How your personal data is collected**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data, Contact Data by filling in forms, creating a User Account or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - create an account on the STRING Travel app;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with the STRING Travel app, we will automatically collect Technical Data about your actions and patterns. We collect this personal data by using cookies and other similar technologies.

By providing us with your Personal Data to use the STRING Travel app, you hereby consent to the collection, use and/or disclosure of such Personal Data in accordance with this Privacy Policy.

4. **Use of personal data**

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

If you decide to close your account, we may still retain some personal data associated with your account for purposes such as backups, fraud prevention, dispute resolution, investigation and compliance with legal requirements.

4.1. Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data where appropriate.

Note that we may process your personal data on more than one ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Basis for processing
To register you as a new user	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or Privacy Policy (b) Asking you to leave a review or take a survey (c) Keeping track of whether you have opted out of our marketing.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Usage	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
Posts uploaded are tagged to a location – part of the STRING Travel app’s essential features.	(a) Technical (b) Profile	(a) Posts uploaded on the STRING Travel app have to be tagged to a location – this is part of the social functions of the STRING Travel app – Performance of a contract with you.
To administer and protect our business and the STRING Travel app (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant STRING Travel app content and advertisements to you and measure or understand the	(a) Identity (b) Contact (c) Profile (d) Usage	Necessary for our legitimate interests (to study how customers use our products/services, to develop them,

effectiveness of the advertising we serve to you	(e) Marketing and Communications (f) Technical (g) Usage	to grow our business and to inform our marketing strategy)
To use data analytics to improve the STRING Travel app, products/services, marketing, user relationships and experiences	(a) Technical (b) Usage (c) Marketing and Communications (d) Profile	Necessary for our legitimate interests (to define types of users for our products and services, to keep the STRING Travel app updated and relevant, to develop our business and to inform our marketing strategy)

4.2. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You may opt out of our marketing mailing list within the marketing/promotional eDMs we send to you. Once you have opted out, we will no longer send to you marketing/promotional materials.

4.3. Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications by email from us if you have requested information from us and you have not opted out of receiving that marketing communication.

4.4. Opting out

You can ask us to stop sending you marketing communication at any time by following the opt out links on any of the eDMs sent to you.

4.5. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the basis which allows us to do so. We will obtain your full and informed consent before using your personal data for an unrelated purpose.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. International transfers and disclosure

By using the STRING Travel app, you acknowledge and agree that the Company may store, process and use any Personal Data collected in the course of using the STRING Travel app, and provide such Personal Data to employees, agents, contractors and other third parties, which may or may not be located outside of your resident jurisdiction. By providing us with your Personal Data, you specifically consent to such transfers of your Personal Data to a country or jurisdiction other than that where it was collected only for the purposes described in this Privacy Policy.

In the course of processing your Personal Data, it may be necessary to disclose and/or transfer Personal Data or any part thereof within the Company, third party service providers and/or other relevant third parties throughout the world for the stated purposes set out in this Privacy Policy. Any disclosure or transfer will be made in accordance with applicable laws. As a general practice, the Company does not sell, rent, or give physical possession of Personal Data to any third parties for any other purposes, apart from those stated in this Privacy Policy.

6. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Your personal data will be protected using encryption. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data based on this Privacy Policy, based on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data Retention

7.1. Duration of retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see Paragraph 9 of the Privacy Policy below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. User's legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. You will also be able to correct your personal data through the profile settings of the STRING Travel app.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which may override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products and services to you.

If you wish to exercise any of the rights set out above, please contact us at **support@stringtravel.com**.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.