

www.travelleaders.com/houstontx

# **Privacy Policy**

WTA/Houston Express Inc., "WTA", includes the WTA/Houston Express Inc. entity as well as dba uses as Travel Leaders / WTA and Atlantida WTA.

We train employees handling visitor information on their roles and responsibilities in protecting your privacy. We regularly assess the privacy and security practices of our Web sites and databases to identify ways we can improve our data practices. If you have questions or concerns regarding this statement, please contact us.

## **Scope and Consent**

This Privacy Policy ("Policy") describes how we protect your privacy when you use our Web site ("Site(s)") or use our services offline as a corporate client. Specific Privacy Notices may be required to comply with the privacy laws of some countries.

## WTA believes in protecting your privacy.

### **Personal Information**

As used in this Policy, the term "personal information" means information that identifies you personally, either alone or in combination with other information available to us. Personal information includes: your name, phone number, email address. Personal Information can be provided in various ways: (1) information you provide to us, such as opting in to one of our email lists; (2) from other companies which you have given permission for them to share your information, such as a corporate client we are handling employee travel for in which case the data is maintained offline only; (3) from your browser, such as IP address, operating system, type of browser (check your browser settings for what it shares); (4) through "Cookies", which are small text files that are placed on your hard disk by a Web server. We may use cookies to collect information about the way visitors use our Sites, pages visited and length of visit to assist us in analyzing visitors' interests and needs and to improve the content and function of our Sites. Cookies cannot be used to install programs or deliver viruses to your computer.

WTA/Houston Express Inc. complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union the United States. WTA/Houston Express Inc. has certified to the



www.travelleaders.com/houstontx

Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <a href="https://www.privacyshield.gov/">https://www.privacyshield.gov/</a>. As a function of these principles our organization will be subject to the investigatory and enforcement powers of the department of transportation in the USA.

In compliance with the Privacy Shield Principles, WTA/Houston Express Inc. commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact WTA/Houston Express Inc. at: WTA/Houston Express Inc., Attn: Jeffrey Uthe, 1177 Enclave Pkwy ste 230, Houston, TX USA 77077

WTA/Houston Express Inc. has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU in the context of the employment relationship.

If a special circumstance occurs and an individual still has an unresolved complaint, they may work with WTA/Houston Express Inc. and request that the complaint be handled under binding arbitration.

WTA/Houston Express Inc. does not share personal data with any third parties. Personal data used for travel purposes is assumed to be non-shareable for any other use. Any question regarding this may be submitted to WTA/Houston Express Inc. at the address above. If research uncovers that WTA/Houston Express was responsible for any personal data going to a third party our liability will be to help individuals recover from any damages the third party caused and to ensure that repairs or changes needed at WTA to prevent further transfer of personal data are completed as quickly as possible.

## **Access and Update Personal Information**

If you become aware that any of the personal information in our records is inaccurate or has been altered, please contact us at houston@travelleaders.com.



www.travelleaders.com/houstontx

If you have additional questions regarding your personal information, please contact us at the email houston@travelleaders.com. If you would like to be removed from our contact lists or request we limit the use of your data, you may request from that email that we remove you from our systems. We will respond promptly within the time limits established by applicable law. For your protection, we may ask you for additional information to verify your identity. In most cases, we will correct or delete any inaccurate information you discover. In some cases, however, we may limit or deny your request if the law permits or requires us to do so.

#### **Use of Personal Information**

We use your personal information to customize the content and layout of our Sites to match your needs, interests, and preferences; and to learn more about your needs and wishes to improve our Sites and other aspects of our services. We may also use your data to complete requested travel management services for Air, Hotel, or Car reservations.

If you chose online to receive email publications such as newsletters, special offers and updates from us, we will send you that information. We present an option to not receive these publications online by supplying an unsubscribe link at the bottom of each publication we email to you. These publication requests are not cross linked with any corporate travel services we do for client companies. Only individuals can request online for the email publications.

We may share your personal online information with companies and organizations that perform services on our behalf. We use a third party to deliver our emails to you. Our third-party service providers are only authorized to use your personal information to perform services on our behalf and are required to protect the confidentiality of your personal information. We do not share, sell, rent or trade personal information with third parties for their promotional purposes.

We may provide personal information to a third party when we believe it is necessary to prevent or investigate a possible crime, such as fraud or identity theft; to comply with a court order or subpoena; to comply with a legal requirement; to protect your vital interests; or in connection with a sale, purchase, merger, reorganization, financing, liquidation, dissolution, or similar event. When we disclose information under these or similar circumstances, we'll take appropriate steps to limit use and protect the confidentiality of your personal information.



www.travelleaders.com/houstontx

We may feature sweepstakes offers on our Web sites. If you enter these sweepstakes, Travel Leaders Network or our suppliers will hold your registration information. If you win the sweepstakes, we may provide your registration information to a sweepstakes partner company for the purpose of providing you your prize.

## **CALIFORNIA RESIDENTS: CALIFORNIA PRIVACY RIGHTS**

California law permits customers of Travel Leaders who are California residents to request and receive the identity of any third parties to whom Travel Leaders has disclosed personal information within the previous calendar year, along with the type of personal information disclosed, for the third parties' direct marketing purposes.

### **Protection of Personal Information**

We maintain appropriate physical, technological, and organizational safeguards to protect your personal information against loss, misuse, unauthorized access or disclosure, alteration, and destruction. Our data networks are protected by firewalls and intrusion-detection sensors. Only those who have a "need-to-know" are authorized to access member accounts, and only after they've been trained on our security procedures.

We use reasonable measures to help protect your personal information and comply with applicable data security laws, but no Web site or database is completely secure, or "hacker proof." Protect yourself and help us prevent computer crime by carefully guarding your password. Our Sites do not use Spyware. If you believe the security of your account has been breached, contact us.

Travel Leaders Network, its travel brands, and Travel Leaders Group are all U.S. corporations. Our online sites on behalf of WTA/Houston Express Inc. may be hosted on Web servers located in the United States or other countries. Our data and call centers are located in the United States, although we may at times use supplemental facilities located outside of the U.S. We share the online personal information we collect with third-party service providers, our Partners, and others around the world as described in this Policy. If we transfer your personal information to another country, we'll take appropriate measures to protect your privacy and personal information. No matter where we transfer your personal information, it will remain subject to the terms of this Policy and your privacy preferences.



www.travelleaders.com/houstontx

Different countries have different data-protection laws, some of which provide more protection than others. By using our online sites, you are consenting to the transfer of your personal information to any country in the world, but only in accordance with the terms of this Policy.

Our offline data uses do not overlap or link to any third-party sites and are accessible only by authorized agents within our office.

## **Other Web Sites**

Our online sites contain hyperlinks to Web sites operated by other companies, including Web sites operated by our third-party service providers and unrelated third parties. This privacy policy does not apply to any of these other Web sites. When you access other Web sites through a hyperlink on our Sites, please take a few minutes to review their terms of use and privacy statements.

Our offline data uses do not overlap or link to any third-party sites and are accessible only by authorized agents within our office.

## **Notice of Changes to Policy**

We reserve the right to change, modify, add, or remove portions of this Policy at any time. Changes to this Policy may affect our use of personal information provided us prior to the effective date of the changes.

Continued participation or use of our online sites after a change will indicate your acceptance of the revised Policy.