

# Policies & Privacy

Effective Date: May 25 2018

## 1. General privacy policy

This privacy policy is intended to help you understand that Transworld Group Limited, its related and associated companies comprising the Transworld group of Companies and variously referred to as "Transworld", "our", "us", or "we", collects personal data and endeavours to keep such data secure, and to be clear about how personal data may be collected by us, our use or processing of personal data, and the choices available to you to update or access your personal data.

This policy applies to all Transworld brands, group enterprises and websites, mobile or other device applications ("apps"), advertising and promotions, technologies, products, projects, ventures and activities (collectively "Activities"). Transworld websites are owned and operated by Transworld, and Activities may be undertaken or offered by our affiliates and partners on the basis of this policy unless communicated otherwise by our affiliates and partners.

If you have any queries, you may contact our Information Security Officer ("ISO") and team by emailing us at [privacy@transworldgroup.im](mailto:privacy@transworldgroup.im)

## 2. Information collection and use (general)

We may collect and combine personal data when you engage with us in relation to Activities, including as follows:

### 1. Information you provide to us

- a. You create an account with us or participate or engage with us any of our Activities. (Please note that we may recognise you or your devices when you participate or engage in Activities even if you are not signed in, as we may use cookies, device identification, and other signals, including information obtained from third parties to associate accounts and/or devices with you.

We keep personal information about our users to complete a customer's orders, requests and enquiries, provide for customer login registration and validation, and to administer the account and Activities, assess the needs of a business or individual to determine suitable Activities and to protect us against fraud and abuse, which will generally include the following information:

- Name
- Address
- Telephone Number
- Email Address
- Date of Birth

- Username & Password
  - Credit Card details (if applicable), including a protected scan/photo of the card
  - Photo/Official Identification
  - Business/entity/organisation details and identification
  - Account number
  - Invoice number
  - Login registration details
  - Activities sought and engaged or participated in, including (if applicable) when sought, and/or purchased/renewed and expiration
  - Information requests
  - Customer service requests which may include notes or details explaining what you asked or what response you received
  - Other data that may identify you
- b. You use services included within our Activities (“Services”) to communicate with others or post, upload, or store any data content (such as messaging services, personal history uploading and attachments, comments, photographs, audio and video). Typically, such data will at least include a telephone contact number or an email address and may (depending on the Services and Activities), include personal and medical history/ details and related data.
- c. You complete contact forms or request newsletters or other information from us. Typically, this will be via email, live chat, or via our website.
- d. You participate in any contest, promotion, survey, or activity we promote that might require information about you.
- e. You submit an enquiry, expression of interest, application for a job, or otherwise wish to work, engage or participate with us.
- f. We (including our agents, representatives, and staff) receive an enquiry involving the Activities, Services generally or in particular, customer support, technical support, billing and accounts related support, compliance and legal issues, or media, including if you seek our assistance.
- g. We store and analyse any communication content, including email content from incoming and outgoing mail in order to personalise, develop, and/or provide relevant advertising, content, features relating to Activities and access to and use of our Services.

- h. You otherwise access, engage or participate in our Activities, including to view content or install any software we make available and access or make use of our Services.

## 2. Information from analytics, cookies, tracking, and similar technologies

We may collect information from data collection technologies to allow us to understand your access to, use, participation or engagement in Activities, to collect and store information when you interact with Activities we offer to partners, and to analyse, expand on and improve the Activities, their availability , performance and use .

Such information:

- a. Is collected when you access advertising, content, websites, interactive widgets, applications, and other products (associated generally or as to any particular Activities) where our data collection technologies (such as cookies, development tools, and other technologies) are present.
- b. Is collected from your devices (including portable and non-portable computers, mobile phones, and tablets) that may include:
  - 1) device specific identifiers and information such as:
    - i. browser configuration, plugins, and version(s)
    - ii. cookie information
    - iii. device settings
    - iv. Internet Protocol (IP) addresses
    - v. location information or data capable of being used to approximate location
    - vi. metadata
    - vii. mobile device and advertising identifiers
    - viii. mobile network information
    - ix. operating system type and version
    - x. software data
  - 2) Other information that allows us to recognise your activity across other devices and Activities to provide you with personalised experiences and advertising across the devices you use. Consequently, the

information we collect may include how you interact with our Activities and those of our third-party partners.

- c. Includes data about usage of Activities (such as language preferences, log files, metadata), as well as browsing behaviour and analytics such as:
  - 1) The type of advertisement or content shown to you and your level of engagement (including links clicked)
  - 2) The duration and frequency of your activities
  - 3) The apps or websites you used immediately before and/or after accessing, engaging or participating in our Activities
  - 4) Whether you visited an advertiser's website, downloaded an advertiser's app, purchased a product or service advertised, or took other actions

### 3. Information from third parties

We may collect information about you when we receive it from other users, third-parties, and affiliates, which we may use to analyse, expand, or update the accuracy of our records, identify new customers, and enable engagement or participation in Activities, the improvement and tailoring of Services that may be of interest to you

Such information may be received:

- a. When you connect your account to third-party services or sign in using a social media website (such Facebook or Twitter)
- b. From publicly-available sources
- c. From advertisers about your experiences or interactions with their offerings
- d. When we obtain information from third-parties or other companies, such as those that engage or participate in our Activities or provide Services input and support. This may include your activity on other sites and apps as well as information those third-parties provide to you or us about their products or services.

## Use of Information

Our website and mobile applications may contain links to third-party websites. We are not responsible for the privacy practices or the content of third-party sites, and as such, we encourage you to read the privacy policy of any website you visit.

We combine and use information we have about you (including such information collected through and outside of our Activities) for the following purposes:

- 1. **Providing, developing, enhancing and improving Activities, their access, use, engagement and participation (including Services generally and in**

**particular) and which we may render accessible, offer or provide to you, such as:**

- a. provisioning, activating, setting up and maintaining of Activities and features related to the respective Activities.
- b. Improving, maintaining, and optimising the content, operation, and performances of our websites, mobile applications, social media pages, and Activities.
- c. Minimising the occurrence of fraud or abuse of our Activities.
- d. Identifying areas of improvement, possible or required enhancements to Activities, errors, and any security risks.
- e. Analysing your interaction with our Activities, your content and other information (such as emails, instant messages, attachments, and other communications), and your interests.
- f. Associating your activity across our Activities and your different devices as well as associating any accounts you may use across our Activities.
- g. Carrying out or supporting promotions.
- h. Conducting research or supporting innovation.
- i. Collecting statistics about the overall access to, engagement with and use of our Activities.

This information relates to your purchase, use, engagement and participation in and/or other interaction with our Activities, and usually consists of data that is aggregated or statistical about how customers engage and participate in or use our Activities. This information is not usually linked to personal information, but we treat the information as personal to the extent that it is linked to personal information.

**2. Contacting you ourselves or through a third party service provider regarding our Activities via email, text messages (such as SMS messages), telephone calls, and automated calls or messages, including when:**

- a. Communicating regarding Activities you have signed up for, requested information on, or have engagement or participation in.
- b. Communicating offers and opportunities in relation to additional Activities and (without limitation) Services that we think you may value if you consent or to the extent allowed based upon legitimate interests. You are not required to consent in order to engage or participate in our Activities and (without limitation) to acquire Services from us.

Your communication preferences can be updated with respect to receiving communications from us and/or our partners after signing into your Account Manager.

**3. Transferring your information to another country, such as:**

- a. If Activities are provided to a country other than where our servers are located, your communications with us may result in transferring your personal information across international borders.
- b. When you contact us by email, telephone, through our website (such as online chat), we may provide you with support from a location outside of your country of origin.

Regardless of the country where you reside, you authorise us to transfer, process, store and use your information in countries other than your own in accordance with this Privacy Policy and to provide you with Activities and (without limitation) general or particular Services. Some of these countries may not have the same data protection safeguards as the country where you reside.

**4. Legal, regulatory, law enforcement, and other purposes, for which we may access, preserve and disclose information to investigate, prevent, or take action in connection with:**

- a. Legal process and legal requests, including subpoena requests, Court orders, and when required by government or government agencies, law enforcement officials, and Courts, tribunals, and other judicial or quasi-judicial bodies to such extent (if any) that we determine in our sole discretion notwithstanding the jurisdiction from which said requirement is imposed.
- b. Enforcing our Policies and Agreements.
  - 1) Allegations or claims that any content violates the rights of third-parties.
  - 2) Suspected activity that is unlawful, illegal, or unethical.
  - 3) Requests for customer service.
  - 4) Technical issues.
  - 5) Protecting the rights, property or personal safety of us, our users or the public, including to lessen or prevent a serious and imminent threat to an individual's life or health.
  - 6) Establishing or exercising our legal rights or defending against legal claims.
  - 7) Compliance with all and any applicable regulatory authorities
  - 8) A request by you to provide you with a copy of your information or to delete your information in accordance with this policy.
  - 9) Otherwise complying as required by law.

**5. Sharing your information with third parties we trust, and subsidiaries, associated and related companies within the Transworld group of companies including its personnel, officers, and agents, for them to assist and engage with you in the provision of Activities, including (without limitation) general or particular Services, or act on our behalf, such as:**

- a. Processing payments.
- b. Customer service, including to address your requests, and for managing our relationships.
- c. Contacting you with marketing information, contests, or surveys.

- d. Advertising, location-based Activities, including (but not limited to) general or particular Services, search results, and other content consistent with your location settings.
- e. A new owner if the ownership or control of any entity or business within the Transworld group of companies changes as a result of a merger, acquisition, or sale of assets. This may amount to a complete transfer of the information rather than just sharing the information.

We do not share your personal information for a third party to provide any products or Activities outside of those requested or as needed on our behalf. These third parties (including subcontractors) would be subject to strict policies or agreements, in that they are prohibited from keeping, processing, sharing, or using your personal information for any purpose other than as they have been specifically contracted for (or without your consent).

#### **6. Sharing your information with non-affiliated companies who provide us with advertising, analytics, and business support.**

We may share aggregate information with partners, such as publishers, advertisers, measurement analytics, apps, or other companies. For example, we may share information as to the performance, or report on key metrics and statistics related to said activity.

We do not share information that personally identifies you (personally identifiable information is information like name or email address) with such partners.

When you use third-party apps, websites or other products integrated with our Activities, they may collect information about your activities subject to their own terms and privacy policies. The information collected does not include certain personal data such as name, address, billing information, etc. but may be transmitted to and stored by these service partners on servers in a country other than the country in which you reside. or in which we operate.

We may allow third party companies to display advertisements on our webpages or apps to collect information from your browsers or devices. Other companies' use of cookies and other data collection technologies are subject to their own privacy policies, not this one. Like many companies, we may allow cookie matching with select partners but do not allow access to our cookies.

You can control the technologies we use by managing your settings through the "cookie banners" that may be presented (depending on URL of website visited) when you first visit our webpages, or by modifying the settings in your browser.

### **Deleting or Obtaining Copy of Information**

You can contact us to request a copy of your personal information or delete your information by emailing our Information Security Officer at [privacy@transworldgroup.im](mailto:privacy@transworldgroup.im). The Privacy Officer shall attend to your request on a confidential basis within thirty (30) days of the request being received. Any request for deletion will only be undertaken to the extent that it is no longer necessary for any

Activities engaged or participated in, purchased or required for our legitimate business purposes or legal or contractual record keeping requirements worldwide.

Access of your personal information may be refused if:

- Providing access would pose a serious and imminent threat to life or health of a person;
- Providing access would create an unreasonable impact on the privacy of others;
- The request is frivolous and vexatious; or
- Denial of access is authorised or required by law.

## **Information Security, Storage, and Retention**

We will endeavour to keep your personal information as secure as reasonably possible. Without limitation, registration information is not accessible over the Internet, but only from a secure password-protected internal workstation. Our Internet servers utilise a modern Windows-based operating system that is maintained with the latest available security patches and updates.

The security of your personal information is important to us. When you enter sensitive information (such as a credit card number) on our order forms, we encrypt the transmission of that information using Transport Layer Security (TLS), the successor to Secure Sockets Layer (SSL).

We follow the strict standards set out by the Payment Card Industry (PCI) Security Standard to store and protect the personal data we collect, both during transmission and once we receive it. We also adhere to ISO 27001 in the adoption of a business wide Information Security Management System (ISMS) to ensure information security is at the forefront of all aspects of business operations. However, as no method of transmission over the Internet, or method of electronic storage, is 100% secure, we cannot guarantee its absolute security. If you have any questions about security on our website, you can contact us at [privacy@transworldgroup.im](mailto:privacy@transworldgroup.im).

We retain personal data only for as long as necessary to provide access to, engagement and participation or use of the Activities including (without limitation) any Services you have requested and thereafter for a variety of legitimate, legal, or business purposes. These might include retention periods of up to six (6) years:

- mandated by law, contract or similar obligations applicable to our global business operations;
- for preserving, resolving, defending or enforcing our legal/contractual rights, and/or resolving disputes; or
- needed to maintain adequate and accurate business and financial records.



If you have any questions about the security or retention of your personal data, you can contact our Information Security Officer at [privacy@transworldgroup.im](mailto:privacy@transworldgroup.im).

## Information Quality

We will use all reasonable endeavours to ensure the accuracy and quality of the information collected about you. If your personal information changes, or if you no longer desire our service, you may correct, update, amend, or deactivate your account by making the change on your Account Profile page of the Account Manager or by emailing us at [customercare@transworldgroup.im](mailto:customercare@transworldgroup.im).

Alternatively, you can contact us via other avenues specified on our [Contact Us](#) page. Should personal information that you know has been collected about you change, it is your responsibility to bring the changes to our attention.

## Tracking technologies

We use cookies for to remember users' settings and for authentication. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited.

We, and/or our partners, affiliates, or analytics or service providers, may use tracking technologies such as cookies, beacons, tags, and scripts to analyse trends, administer the website, track users' movements around the website, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies from these companies on an individual or aggregated basis.

The third parties with whom we partner to provide certain features on our website or to display advertising based on your web browsing activity, use Local Shared Objects (Flash cookies) to store content information and preferences. To manage Flash cookies, please click here: [http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager07.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html)

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and clickstream data.

We do link this automatically-collected data to personal information. IP addresses are tied to personal information for the purposes of logging site actions (updating information, buying products, etc.) so that in the event of a bug or a dispute, we can review the actions taken that led to the outcome and attempt to reproduce the issues.

Some browsers allow you to automatically notify websites you visit not to track you using a "Do Not Track" signal.

There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online Activities, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit [www.allaboutdnt.com](http://www.allaboutdnt.com).

## **Behavioural targeting**

We partner with a third party ad network to either display advertising on our website or to manage our advertising on other sites. Our ad network partner uses cookies and Web beacons to collect non-personal information about your activities on this and other websites to provide you targeted advertising based upon your interests.

## **Sensitive information**

We will not collect information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or details of health, medical history, disability or sexual activity or orientation, unless such is inherent to the Activity and/ or requisite to any particular Services that you seek access to, enquire about, purchase, make use of or otherwise partake or participate in, where we are compelled to do so by law.

## **Social media widgets**

Our website includes Social Media Features, such as the Facebook 'Like' button and Widgets, the 'Share this' button or interactive mini-programs that run on our website. These Features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. Your interactions with these Features are governed by the privacy policy of the company providing it.

## **Import contacts**

You can import contacts from your email account address book(s) to invite your contacts to join our website. We collect the username and password for the email account(s) from which you wish to import contacts, and we will only use your username(s) and password(s) for the purpose of importing contacts.

## **Use of Non-personal information**

You acknowledge and agree that any testimonials or feedback you provide to us may be used for training and/or marketing purposes. We reserve the right to use any testimonials or feedback for any purpose at our sole discretion. You acknowledge and agree that any feedback you provide may be shared with third parties via social media and associated programs.

You acknowledge that you relinquish any proprietary rights you may hold over information, data, or opinions that you provide to us by way of a testimonial, complaint, or feedback.

If you wish to update or delete your testimonial or feedback, you can contact us at [privacy@transworldgroup.im](mailto:privacy@transworldgroup.im).

## Age restrictions

Our Activities are available for purchase only for those over the age of 18. Our Activities are not targeted or applicable to, or designed, intended for or to entice individuals under the age of 18. If you know of or have reason to believe anyone under the age of 18 has provided us with any personal data, please contact us.

## Data Protection Authority

If you are a resident of the European Economic Area (EEA) and believe we maintain your personal data subject to the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority, the UK's Information Commissioner's Office, as noted below:

[www.ico.org.uk](http://www.ico.org.uk)

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Phone: 0303 123 1113

## Changes to this policy

We reserve the right to modify our Privacy Policy to reflect changes to our practices at any time. If we make any material changes, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site ( or that of any Transworld group company, prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

## Contact us

If you have questions about this Privacy Policy, our privacy practices, or our Activities, you may contact our Information Security Officer and other representatives by email at [privacy@transworldgroup.im](mailto:privacy@transworldgroup.im). We endeavour to respond to all requests, enquiries, and concerns within thirty (30) days of receipt. General enquiries may also be directed to:

Transworld Group Limited, Dolberg House, 9 Athol Street, Douglas, Isle of Man, IM1 1LD, British Isles

Australian Callers: +61 (0)7 3102 3768

UK Callers: +44(0)20 3286 1840

USA Callers: +1 (917) 310-1024

Hong Kong Callers: +852 (0)8197 0395