

Privacy Statement

Hong Kong Wing On Travel Service Limited (hereinafter referred to as “the Company”, “we”, “us” or “our”) respects the privacy and personal data of customers and is committed to the full implementation of data protection principles and regulations under the “Personal Data (Privacy) Ordinance”, Chapter 486 of the laws of Hong Kong Special Administrative Region, in its methods and guidelines regarding the collection, use, storage, disclosure, transfer, confidentiality and access of personal data, so as to protect the personal data provided by customers to us, and we ensure that our staff strictly comply with the relevant security and confidentiality standards at all times. To this end, the Company shall implement the following privacy policy principles:

Wing On Travel websites and its mobile app (hereinafter referred to as “the platform”) is a platform designed by the Company to provide online travel information to travellers. Any person who visits the platform agrees that he/she has read, understood and accepted the content of this privacy policy and agreed to be bound by it.

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Welcome to Wing On Travel! This Privacy Statement, together with our Cookie Statement and Terms and Conditions, sets out the approach that we at Wing On Travel take with regards to the collection and handling of any identifiable information about you, and applies to all Wing On Travel websites (including any affiliated sites), mobile app, and other services operated by us (hereafter collectively referred to as the “Services”).

We understand that providing information online involves a great deal of trust on your part. We take this trust very seriously and make it a high priority to ensure the security and confidentiality of the personal information you provide us when you visit our platform or use our Services. Before providing us with your personal information, please read this Privacy Statement carefully to learn about our privacy practices.

About This Privacy Statement and Wing On Travel

When Does This Privacy Statement Apply?

This Privacy Statement applies to information about you as an identifiable person that Wing On Travel websites or its mobile app collects from, or about you. This Privacy Statement does not apply to anonymous data that cannot identify you in any way. This platform may contain links to third-party platforms. Wing On Travel is not responsible for the privacy practices or the content of these third-party platforms. We recommend that you carefully read the privacy statements of such platforms.

Data Controller

The data controller of any and all information provided to or gathered by Wing On Travel websites and its mobile app is Hong Kong Wing On Travel Service Limited, we are a limited liability company.

About Your Personal Information and Uses

What Personal Information Does Wing On Travel Hold on Me and Others?

● Information You Provide Us Directly

Wing On Travel collects and uses the information you provide to us directly in order to provide you with the services you request. For example, you may provide us your name, gender, birthday, mobile number, email, and other information when you register a Wing On Travel membership account. When booking flight or train tickets, or using our airport transportation service, you may provide passenger names, genders, ID document numbers and the contact person's name, mobile number, email as well as other information. When booking the travel products and services, you may provide the travellers' names, contact person's name, mobile number, and email, etc. When making the payments, you may provide your bank card number, the mobile number previously provided to the bank, or your credit card number, cardholder name, expiry date, etc.

In order for us to customize the services we provide you, we may also collect information about your travel plans and preferences which includes your meal requirements, departure date, check-in and check-out times, seat choice, ticket choice, insurance choice, and your selection of other services (including but not limited to airport transportation service, attraction tickets, and packaged tours, etc.) provided by Wing On Travel.

If you need to get in touch with our customer service team, or reach out to us through other means (such as through social media) we will collect information from you there too, such as your name and contact information. This includes recording phone conversations, when you call us and when you answer our calls.

You may also participate in referral programs or sweepstakes. Doing so will also mean providing us with your name and contact information. In addition to this, you can provide us with feedback or ask for help with using the travel services by Wing On Travel.

You may be travelling with other guests or make a booking on someone else's behalf, in which case you will provide similar details to Wing On Travel. However, we would like to remind you that it is your responsibility to ensure that the person or people whose personal information you have provided are aware that you've done so, and have agreed to your sharing of their personal information with Wing On Travel for these purposes.

● **Information We Collect Automatically**

Wing On Travel collects some information about you automatically. Specifically:

Log information, which refers to information that the system may automatically collect through cookies, or other channels when you use our services, including:

- ✧ Device information or software information, such as your IP address, software version and device identifier (IDFA / IMEI) of the mobile device you use, and configurations of the web browser or mobile device you use to access our services.
- ✧ Information that is searched for or browsed when you use our services, such as web pages used or terms searched and pages visited through the app, as well as other information browsed or provided when using our services.
- ✧ Information contained in the content you share through our services, such as a photo shared or uploaded, comments, and dates and times, etc.
- ✧ Information on your preferences, such as language, region and currency.

Location information, which we collect when you turn on your device's location feature and use our location-based services. This includes your geographical position information collected via GPS or WIFI and shared information uploaded by you or others showing your current or previous location. You can turn off the location feature to prevent us from collecting your location information.

More information on how we use cookies can be found in our Cookie Statement below.

● **Information We Receive Through Other Sources**

We will also obtain your information from affiliates and business partners. For example, when you make a booking or reservation through the website or mobile app of one of our affiliates or business partners, your

booking or reservation information with them might be forwarded to us so that we can process your booking. Also, we allow you to log into Wing On Travel with your social media account, and with your consent (you grant authorization to the social platform), your personal information will be shared with us through that social platform.

- **Special Categories of Personal Information**

In connection with fulfilling your travel requests for disability considerations and dietary preferences, some information you provide us with may be considered as “special category” personal information.

- **Data Retention Policy**

The personal information in your booking that are unnecessary to be retained will be deleted from the system 30 days after your trip is completed, including date of birth, travel document number, HKID card number, etc.

How Does Wing On Travel Use My Personal Information?

Wing On Travel will generally collect and use your personal information for the following purposes:

- 1) **Providing services to you:** We will use your personal information to complete and manage your online booking. In addition, we will provide you with related products and services through affiliates, business partners, and third parties.
- 2) **Fulfilling obligations:** Dealing with insurance claims and payments that occur under relevant policies, processing commissions paid to partners, claiming for loss caused by service partners, or recovering payments made etc.
- 3) **Account management:** You can create a Wing On Travel membership account and we will use the information you provide to manage your account and provide you with practical features. You can use your account for various operations, such as managing bookings, adjusting personal settings, adding frequently used passenger information, checking past bookings, evaluating orders, and managing payments, etc.
- 4) **Responding to your inquiries and requests:** We provide customer service to offer help when you need it.
- 5) **Marketing activities:** Where you have a Wing On Travel membership account, we will also use your personal information for marketing purposes, such as sending you information and promotional activities on travel products or services that may interest you.
- 6) **Contacting you:** Responding to and dealing with your questions or requests, sending booking-related messages (such as messages notifying you of bookings are submitted successfully, messages reminding you

to complete the unfinished bookings, etc.). We may also send you questionnaires or invite you to provide feedback on our services, etc.

- 7) **Market research:** We will sometimes invite you to participate in market research to better understand your interest in our products, services, websites and mobile app.
- 8) **Improving service security and reliability:** We may detect and prevent fraud and illegal activities and use your personal information for risk assessment and security purposes. If you are using our app, it will send us error-reporting information in the event that it crashes or hangs. This enables us to investigate the error and to improve the stability of the app for future releases.
- 9) **Data analysis:** We may use your personal information for analysis so that we can get to know your location, your preferences, and demographic information, or match it with the data obtained from other sources (including third parties), to develop our products and services or marketing plans, and to improve our services.
- 10) **Daily operations:** Including but not limited to booking management, customer verification, technical support, network maintenance, troubleshooting, internal administrative affairs, internal policies and procedures, and producing internal reports.

11) **Monitoring:**

- We monitor customer accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law.
- Your phone conversations with our customer service staff, both answering our calls and calling us, may also be recorded. We may rely on these recordings to monitor the quality of our customer service, check the accuracy of the information you provide to prevent fraud, or serve the purpose of internal staff training.
- We monitor your use of our websites or mobile app, to help us refine and improve the way our websites or mobile app functions.

12) **Reviews and feedbacks:**

- We display guest reviews on the related accommodation information page on our websites, on our mobile apps, on our social media accounts and social media apps, or on the website of the related accommodation or business partner's website. This is to inform other travellers about the quality of the travel product you used, the destination you chose, or the other services you have used.

- We will also aggregate your guest review data with feedback from other customers in order to sort and prioritize guest reviews. We may use the information in your reviews or in other destination-related information you share with us in an anonymous form, unless you have included this information in your public profile. This is to help travellers like you find the right destination and the best accommodation to suit them.

13) **Payment verification:** If you use a credit or debit card as payment, we also use third parties to check the validity of the sort code, account number, and card number you submit in order to prevent fraud.

14) **Investigations and complaints management:** We use information you provide to investigate any complaints received from you or from others about our website, or our products and services. We also use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including the disclosure of such information in connection with legal process or litigation).

15) **Purposes which are required by law:** In certain cases, we may need to use your information to handle and resolve legal disputes, regulatory investigations and compliance, respond to requests by government or law enforcement authorities conducting an investigation, or to enforce the Terms and Conditions in connection with any Services provided by Wing On Travel as reasonably expected.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you can withdraw that consent, however where you do we may not be able to perform the contract we have or are trying to enter into with you (for example, to fulfil your booking). To withdraw your consent, please contact us at members@wingontravel.com.

How Does Wing On Travel Share My Information?

We may share your booking information, Wing On Travel membership account information, device information, and location information with affiliate companies within our corporate family and third parties, such as the partners detailed below, to ensure the successful provision of services to you. Our partners include the following types:

- **Providers:** including but not limited to hotels, airlines, cruise lines, car rental agencies, travel agencies, scenic spot operators, and event providers and agents that meet your booking needs. These providers may contact you as needed to provide you with travel products or services. These providers are not controlled by Wing On Travel and personal information disclosed to them is subject to the applicable provider's privacy statement and security practices. Therefore, we encourage you to review the privacy policies of any travel provider whose products you purchase through Wing On Travel.

- **Third party vendors:** We may work with third party vendors under contract to us to provide services or functions on our behalf, including credit card processing, business analysis, customer service, marketing, distribution of surveys or sweepstakes, and fraud prevention. We may also authorize third-party vendors to collect information on our behalf, including information necessary for us to operate the features of our website or to facilitate the delivery of online advertising tailored to your interests. Third-party vendors have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose.
- **Financial institutions and third-party payment agencies:** When you place a booking, apply for a refund, or purchase insurance, we will share the related information with the relevant financial institutions or the third-party payment agencies, and as we believe is necessary for fraud detection and prevention, we will further share other necessary information (i.e. email address, phone number, and IP address) with the relevant law enforcement agencies.
- **Business partners:** With whom we may jointly offer products or services, or whose products or services may be offered on our websites or apps. You may tell when a third party is involved in a product or service you have requested because their name will appear, either alone or with ours. If you choose to access these optional products or services, we may share information about you, including your personal information, with those partners. Please note that we do not control the privacy practices of these third-party business partners.
- **Affiliated companies within our corporate family:** We may share your personal information with our affiliated companies so that we provide you with the best requested service as well as information about other travel-related products and services. All parts of our company provide similar protection measures for your personal information that are no less stringent than this Privacy Statement.

We may also share your information in the context of complying with legal obligations, to protect our or your interests in legal matters, and in the case of a merger or acquisition.

Data Utilization

Wing On Travel will generally use your data which obtain from third-party service provider (e.g., Facebook, Google, Apple) for the following usage :

- 1) **Data we obtain:**

- When you register as a member of a third-party service provider (e.g., Facebook, Google, Apple), we will obtain your data (such as name, email address and any information you choose to provide) and UID according to your settings at the third-party service provider.

- We will also obtain relevant data from third-party service providers about your interactions with Wing On Travel on their websites or Apps (such as your likes or comments on Wing On Travel's Facebook page).

2) **How we process the data:**

- We will use your provided data (such as name, email address) and UID, which obtain from third-party service providers to register and login Wing On Travel membership account.

- We will use your contact information to recommend the latest itineraries, discount information, other newsletters or product information you may be interested in, or deliver advertisement to you on third-party platforms (such as Facebook, Google).

3) **Purpose of collection:**

- We process the Personal Information collected in as far as necessary for performance of the contract with and providing services to you. Besides, we process the other Personal Information collected on the basis of our legitimate interests, which are the further improvement of the services and for direct marketing purposes.

- We use your Personal Information or such other data to achieve faster registration and login account requests, faster purchase requests, better customer support and to provide you with timely notice of new Services and special offers.

4) **How to remove the data:**

You may at all times access, correct or erase your Personal Information through Wing On Travel Platform via the user portal, under “My Account”. Alternatively, you may make your data access, correction or erasure request by sending your request by email at members@wingontravel.com .

Modification of Privacy Statement

Wing On Travel will modify this Privacy Statement when necessary. Please understand that we may revise this Privacy Statement at times as we consider appropriate. We will note the date of the latest update of this Privacy Statement and the update will take effect when it is published. Without your explicit consent, Wing On Travel will not reduce your rights under this Privacy Statement. Wing On Travel will prominently post major changes made. Therefore, you should review this Privacy Statement periodically to keep up with our most current policies.

Cookie Statement

We use cookies to deliver our services and to help us improve our website.

What is a cookie?

A cookie is a small text file that we store on your computer when you use our website. To learn more about cookies, please go to www.aboutcookies.org.

What cookies does Wing On Travel use?

We use the following cookies:

Essential cookies

- These are cookies that our website cannot operate without. They include, for e.g., cookies that enable you to log into secure areas of our website, use a shopping cart and pay for travel products.

Non-essential cookies

- **Functionality cookies:** These are used to recognise you when you return to our website. This enables us to personalise our content for you and remember your preferences (for e.g., your choice of language, region and currency).
- **Analytical and performance cookies:** These allow us to count the number of visitors to our website and to see how they move around it. This helps us improve the way our website works, for e.g., by ensuring that users are finding what they are looking for easily.
- **Targeting cookies:** These cookies record your visit to our website, the pages you have visited and the internal links you have followed. We will use this information to make our website and the travel products we display to you more relevant to your interests.

We use session and persistent cookies. Session cookies are deleted when you close your browser. Persistent cookies remain on your computer and are activated the next time you visit our website.