

CW Government Travel Inc. Data Protection and Privacy Policy

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Why do we collect personal data?

This Data Protection and Privacy Policy explains how CW Government Travel, Inc., d.b.a. CWTSatoTravel and/or SatoVacations uses personal information. CWTSatoTravel provides travel management services for official travel, leisure in conjunction with official travel and leisure travel to U.S. military and government agencies and other entities under contracts and agreements with these agencies and entities. In the performance of these agreements, in order to provide the travel services, CWTSatoTravel must collect certain data from travelers, from personnel system or from users of our websites.

What data do we collect?

In order to properly provide travel services to our Clients and their travelers, CWTSatoTravel creates an electronic 'Traveler Profile' for each traveler. The personal data is entered through feeds from the customer's systems or by the traveler (or the authorized travel arranger). The personal data that we collect for each traveler may include: name, gender, date of birth, address, phone numbers, email addresses, credit card references/numbers, travel destinations, travel schedules, travel preferences (seat, meal, smoking, etc.), passport and visa details, as well as next of kin information. This 'Travel Profile' may be stored in the Global Distribution System used to make reservation or in the online booking tool service provider used to provide online reservations. CWTSatoTravel collects personal data from users to its web sites through the use of online forms and when the user emails us his/her details. CWTSatoTravel forwards these user requests to the appropriate CWTSatoTravel team to respond to the user.

How we process personal data

In addition to creating Traveler Profiles and 'passenger name record' (PNR), CWTSatoTravel uses the personal data (usually the PNR) of the traveler for the following travel and other travel-related purposes.

Reservations: The Traveler Profiles are stored in a database as a reference document to be consulted each time a reservation is to be made. When a reservation is made, CWTSatoTravel creates a PNR that contains all of the personal data along with the reservation information that is needed to fulfill the travel request of a traveler and to fulfill regulatory requirements for travel to certain destinations such as the Secure Flight program in the United States and the Advanced Passenger Information System in several countries such as the UK, China. To make reservations, CWTSatoTravel needs to transfer personal data to various third party travel suppliers (such as airlines, hotels, car rental companies, online booking tool companies and safety and security tracking providers, as well as computer reservation systems) within the traveler's home country or in another country where the traveler may be traveling and often also to government bodies

for certain destinations (such as U.S. Department of Homeland Security). Without this information travel will not be possible.

Consolidation of Travel Data: At the request of the Client (the entity paying for the travel), CWTSatoTravel or a third party may prepare information reports that summarize and analyze the travel expenditures per destination, per travel supplier, etc. Such reports may include certain personal data from the traveler's profile.

Transfers to Third Parties at Client's Request: CWTSatoTravel may transfer personal data to third parties at the request of the Client. For example, for data consolidation or emergency traveler tracking services. These transfers could involve transfers of personal data to other countries.

Transfers within the CWTSatoTravel group: Transfers are made throughout CWTSatoTravel, its subsidiaries, its parent company, CWT, joint ventures and international partners to support travel-related services such as emergency online booking services, airline ticket issuance and technical help-desk requests, and for screening where required for compliance with the law or data storage.

Transfers to CWTSatoTravel service providers: transfers are for CWTSatoTravel to obtain support services in connection with the travel and meetings & events services to its clients (such as administrative, information technology and technology platforms for CWTSatoTravel tools, telecommunications, payment services).

Regulatory transfers: CWTSatoTravel may be required by law to transfer data to governments and law enforcement agencies where required.

Compliance with Travel Policy: At the request of the Client, CWTSatoTravel may report on the compliance of the travelers with the travel policy of the Client and identify any exceptions to the compliance.

Collecting Travel Payments: CWTSatoTravel may transfer personal data to third parties in the traveler's home country or to another country for the purpose of collecting payments related to travel reservations.

CWSatoTravel Databases: The electronic Traveler Profiles that CWTSatoTravel maintains are stored in the Global Distribution System used to make travel reservations. For clients using an OBT provider, the personal data may be stored by these third-parties.

Application of the Policy

Transfer to Third Parties: Prior to a transfer, third parties (except for travel suppliers and authorized transfers) are required to sign a data transfer agreement with CWTSatoTravel that requires them to follow the applicable data protection laws.

Security: CWTSatoTravel has implemented appropriate technical and organizational measures to protect the personal data obtained from our Clients' travelers against accidental or unlawful disclosure or destruction. CWTSatoTravel is required to adhere to applicable security requirements in those contracts and agreement with respect to the safeguarding of, access to, and processing of, any travel or traveler data. These security requirements may include the Privacy Act and/or adherence to data protection for information management systems in accordance with guidance issued by the National Institute of Standards & Technology or by the U.S. Office of Management & Budget, or specific agencies.

Retention and Deletion: CWTSatoTravel keeps personal data only as long as required to fulfill the services requested by the Clients and/or in accordance with the appropriate data retention periods specified in the contract or in accordance with applicable retention periods specified in the Federal Acquisition Regulations.

Exceptional situations: There are some situations, however, where the normal procedure will be impossible to follow. In these cases, the information for the trip (including personal data) will not be given by the traveler, but by a third party. If the Client provides personal data to us about a traveler, the Client must ensure that it is entitled to disclose that data to us, and that without us taking any further steps required by data protection and privacy laws, we may collect, use, and disclose such information for the purposes described above. The Client should take reasonable steps to ensure the individual traveler concerned is aware of the various matters detailed in this CWTSatoTravel Data Protection and Privacy Policy as those matters relate to that individual, including our identity, how to contact us, the purposes of collection, our information disclosure practices, the individual's right to obtain access to the data, and the consequences for the individual if the data is not provided.

Leisure travelers: In many instances, our leisure operations also keep traveler profiles.

Travelers' Rights of Access

The traveler has a right of access to his/her personal data.. To contact CWTSatoTravel with questions or issues about CWTSatoTravel's data processing, the traveler should contact his/her primary contact at CWTSatoTravel, either the usual travel counselor who books the travel or the program manager, the primary contact of the Client.

Frequently Asked Questions

How does CWTSatoTravel notify the travelers of its data policies?

CWTSatoTravel notifies the travelers about CWTSatoTravel's data processing through this Policy. Under the ETS contract with GSA, CWTSatoTravel also include a Privacy Statement.

Why is the travel agreement between CWTSatoTravel and the Client not sufficient to protect the travelers' personal data?

The travel services agreement is between the corporate Client and CWTSatoTravel, not between the traveler and CWTSatoTravel. However many of these agreements do reference the Privacy Act and the various security requirements concerning traveler data. However, in addition, data protection laws protect the rights of the individual traveler, and in processing the individual traveler's data, CWTSatoTravel has obligations under these laws which it has to fulfill itself and cannot pass onto the Client.

When does CWTSatoTravel need to obtain the traveler's consent?

Practically speaking, it will be very difficult and in some countries even impossible for CWTSatoTravel to provide travel services to an individual traveler who refuses to allow CWTSatoTravel to process his/her travel data.

What obligations does CWTSatoTravel have in processing the data?

CWTSatoTravel must ensure, at the very least, that the personal data:

- is processed fairly and lawfully,
- is obtained only for specific and lawful purposes and shall not be further processed in any manner incompatible with these purposes,
- is not excessive (in terms of the type of data requested) in relation to the purposes for which it is collected and further processed,
- is accurate,
- is kept secure and not held for longer than necessary.

Can CWTSatoTravel use the data to carry out its own analyses?

CWTSatoTravel may not use the data for promotion and marketing purposes by third parties unless the traveler gives his/her consent. However, CWTSatoTravel may, for instance, use the data to analyze the travel trends of its clients in order to propose other CWTSatoTravel services to the clients without receiving the traveler's consent.

Notes

The following notes are to detail certain points and country specifics.

United States Safe Harbor. The E.U. has negotiated with the U.S. Department of Commerce certain principles and guidelines for the transfer of data. The U.S.-EU Safe Harbor Privacy Principles guide U.S. entities in providing an adequate level of protection for personal data. Carlson Wagonlit Travel, Inc. and its U.S. subsidiaries comply with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Carlson Wagonlit Travel, Inc. and its U.S. subsidiaries (CW Government, Inc.) certify that they adhere to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view the certification of Carlson Wagonlit Travel, Inc., please visit <http://www.export.gov/safeharbor/>.

Dispute resolution for Safe Harbor claims: any question or concerns regarding the use of disclosure of personal information should be directed to your usual contact, either travel counselor or program manager. CWT will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your personal information in accordance with the Safe Harbor principles. For complaints that cannot be resolved between CWT and the complainant, CWT has agreed to cooperate with the European Union Data Protection Authorities or the Swiss Federal Data Protection and Information Commissioner.

This policy is subject to change. The changes will be posted on this web site, so please be sure to check the site regularly.