

Privacy & Cookies Policy

We provide this Privacy & Cookies Policy to explain how we collect, use, share, and process personal data through the OpenGDS web site, the OpenGDS mobile site, our iPhone, Android and other mobile applications and any other online communications and interfaces (the "Site").

1. Collection of Your Personal Data

We collect personally identifiable information ("Personal Data") about you that you provide to us or that we obtain while you are using the Site. Personal Data includes information that can identify you as a specific individual, such as your name, address, phone number, credit card number, e-mail address, age, date of birth, gender, username and password for our Site and any other information you may choose to provide or as may be required to fulfill the requested service. We also collect non-personally identifiable information, including your IP address, search preferences related to specific searches, location, and bids through your interactions with our Site. When we link non-personally identifiable information with Personal Data, we will treat it as Personal Data under this Privacy & Cookies Policy. Other key data collection points are as follows:

Sign-in Features: Our Site includes links to other web sites and online services whose privacy practices may differ from those of OpenGDS. For example, you can log in to our Site using single sign-in services such as Facebook Connect or an Open ID provider. These services will authenticate your identity and provide you the option to share certain Personal Data with us such as your name and email address to pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities on this Site to your profile page to share with others within your network. If you submit Personal Data to or through any of those web sites or services, your information is governed by their privacy policies. We encourage you to carefully read the privacy statement of any web site you visit or online services you use.

Social Media: The Site also includes Social Media Features and Widgets, such as Facebook, Google Plus, Twitter, and YouTube. These features may collect your IP address and/or which page you are visiting on our Site, 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 Site. Your interactions with these features are governed by the privacy statement of the company providing it.

Other Travelers: If you purchase certain services, such as airline tickets, for other travelers, we will collect Personal Data of the other travelers that (i) is required to fulfill the requested service and (ii) you may otherwise provide to us. You must make sure that you have the right to provide such information. By providing any Personal Data of another traveler, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such Personal Data as set forth in this Privacy & Cookies Policy. Personal Data of other travelers is collected only for the purpose of providing such Personal Data to the appropriate travel supplier, such as the airline on which travel will occur, to fulfill the requested service, or as otherwise may be required or permitted by applicable law.

2. Protecting Your Personal Data

We employ reasonable and current technical, administrative and physical safeguards that are designed to prevent unauthorized access, maintain data accuracy, and to ensure correct use of Personal Data. To provide protection for credit card transactions while in transit, OpenGDS currently uses Secure Socket Layer encryption.

3. Use of Your Personal Data

We use Personal Data to provide you with the products and services from our Site, to build features that will make the services available on the Site easier to use, and to contact you about these services. This includes faster purchase requests, better customer support and timely notice of new services and special offers and more relevant content.

Certain jurisdictions require an explanation of the legal basis for the collection and processing of Personal Data. We have several different legal grounds on which we collect and process Personal Data, including: (a) as necessary to perform a transaction (such as when we perform a transaction with you or respond to your requests); (b) as necessary to comply with a legal obligation (such as when we use Personal Data for record keeping to substantiate our compliance with other laws); (c) consent (where you have provided consent as appropriate under applicable law); and (d) necessary for legitimate interests (such as when we offer you relevant marketing if you have not previously objected). The provision of Personal Data as described in this Privacy & Cookies Policy is partly a contractual requirement (to provide information at your request and to engage in transactions with you) and partly a statutory requirement (e.g., for us to substantiate our compliance with other laws and defend claims). In general, you do need to provide the Personal Data to engage in transactions with us, except in limited instances when we indicate that certain information is voluntary (e.g., in connection with surveys). Not providing Personal Data may prevent us from providing you with requested information and carrying out transactions. However, you can always exercise control over our use of data for marketing and you can control the use of cookies on our Site.

4. Marketing

You have control regarding our use of Personal Data for directing marketing. Specifically, and where required by law with your prior consent, we may contact you to offer special savings or promotions, to provide marketing material or other offers, to request feedback on your experience using the Site or our services, or to assist us in improving the Site. If you would prefer not to receive notices of special savings or promotions, you may simply opt-out from receiving them by using the **unsubscribe hyperlink** provided in any communication or contact us.

5. Sharing Your Personal Data

OpenGDS does not share your Personal Data, except as disclosed in this Privacy & Cookies Policy or as otherwise authorized by you. OpenGDS may share your Personal Data with its subsidiaries and affiliated companies and with third parties as described in the categories below:

External Service Providers and Affiliated Companies: When you use our service to reserve airline tickets, hotel rooms or rental cars or to take advantage of any other products and services (such as travel insurance), we may provide Personal Data to the airline, hotel, car rental agency or other involved third-party.

OpenGDS's Agents: Many of the operations we perform require us to hire other companies to help us with these tasks. For example, OpenGDS hires companies to help us handle mail and e-mail (including sending and delivering packages, postal mail and e-mail), analyze the data we collect, market our products and services, handle credit card transactions and provide customer service. The companies we employ to help us with these tasks have access to Personal Data to perform their functions, but may not use it for other purposes. OpenGDS requires all agents to whom Personal Data is disclosed to enter into confidentiality agreements and to agree to act in a manner consistent with the relevant principles articulated in this Policy.

In some instances we utilize service provider platforms to help us provide certain services to you such as our Career services provider, where this Policy governs the collection and use of your

Personal Data even though you are on a third party website. In these instances, you will always know whose Privacy & Cookies Policy governs the collection and use of your Personal Data by clicking on the Privacy & Cookies Policy link provided.

Future Business Transfers: Our business is constantly changing. As part of that process, OpenGDS may sell or buy other companies, and Personal Data may be transferred as part of these transactions. It is also possible that OpenGDS, or substantially all of its assets, may be acquired by another company, whether by merger, sale of assets or otherwise, and Personal Data may be transferred as part of such a transaction. In such cases, the acquiring company would be required to honor the privacy promises in this Privacy & Cookies Policy or obtain your consent to any material changes to how your Personal Data will be handled.

Compliance with Law and Other Disclosures: OpenGDS reserves the right to release Personal Data in order to comply with applicable law and when we believe that disclosure is necessary to comply with a judicial proceeding, court order, or legal process served on us. We may also release Personal Data to enforce or apply the terms and conditions applicable to our products and services, protect us or others against fraudulent or inappropriate activities, or otherwise protect the rights, property or safety of OpenGDS, our affiliated companies, our customers, or others. Please refer to the privacy statements of the companies with whom we share Personal Data in order to protect us or others against fraudulent or other inappropriate activities: www.forter.com/forter-privacy-policy/ and <http://www.accertify.com/en/client-privacy/>.

6. Our Policy On Cookies and Other Tracking Technologies

Cookies and similar tracking technologies, such as beacons, scripts, and tags, are small bits of code, usually stored on a user's computer hard drive or device, which enable a website to "personalize" itself for each user by remembering information about the user's visit to the website.

As described in more detail below, our Site uses cookies to store your preferences, display content based upon what you view on our Site to personalize your visit, analyze trends, administer the Site, track users' movements around the Site, serve targeted advertising and gather demographic information about our user base as a whole. On mobile websites and mobile apps, we may use Anonymous Device IDs and/or Advertiser Identifiers in a manner similar to our use of cookies on our websites. Although these activities involve profiling of you as a user, we use this information for the purposes described. Given the nature of our Site and services as a travel provider, and the limited amount of Personal Data we obtain about you, this profiling activity does not produce legal effects for you nor otherwise does it significantly affect you. Nevertheless, to opt-out of advertising and certain other cookies, please see the links below.

OpenGDS Cookies (First Party Cookies): We, at OpenGDS, use our cookies to improve your web-browsing experience. For example, we use a cookie to reduce the time it takes for you to submit purchase requests by storing a registered user's e-mail address so that the user does not need to enter their e-mail address each time that they log-in to OpenGDS. We will also use a cookie to keep track of your search criteria while you are engaging OpenGDS's services. OpenGDS cookies are associated with a user's Personal Data. However, no third party may use the information we collect through our OpenGDS cookies for their own purposes.

Third Party Cookies: We work with third-parties that place cookies on our Site to provide their services, including:

- **Ad Targeting:** We work with third-party advertising companies to serve ads while you are visiting our Site and permit these companies to place and access their own cookies on your computer in the course of serving advertisements on this Site. These companies may use information obtained

through their cookie (which does not include your name, address, e-mail address or telephone number) about your visits to our and other websites, in combination with non-personally identifiable information about your purchases and interests from other online sites in order to provide advertisements about goods and services of interest to you. Other companies' use of their cookies is subject to their own privacy policies and not ours. Data Providers: We also allow data providers to collect web log data from you (including IP address and information about your browser or operating system), when you visit our Site, or place or recognize a unique cookie on your browser to enable you to receive customized ads or content. These cookies contain no personally identifiable information. The cookies may reflect de-identified demographic or other data linked to data you voluntarily have submitted to us, e.g., your email address, that we may share with data providers solely in hashed, non-human readable form.

- **Analytics/Measurement:** We also use third-party analytics cookies to gain insight into how our visitors use the Site, to find out what works and what does not, to optimize and improve our Sites and to ensure we continue to be interesting and relevant. The data we gather includes which web pages you have viewed, which referring/exit pages you have entered and left from, which platform type you have used, date and time stamp information, and details such as the number of clicks you make on a given page, your mouse movements and scrolling activity, the search words you use and the text you type while using our Site. We also make use of analytics cookies as part of our online advertising campaigns to learn how users interact with our website after they have been shown an online advertisement, which may include advertisements on third-party websites.
- **Remarketing Pixel Tags and other technologies:** In addition, we may share web site usage information about visitors to our Site with third-party advertising companies for the purpose of managing and targeting advertisements and for market research analysis on our Site and other sites. For these purposes, we and our third-party advertising companies may place or recognize a cookie on your computer, device or directly in our emails/communications or may place pixel tags (also called clear gifs) on some of the pages you visit on our Site. We will then use the non-personally identifiable information that is collected using these pixel tags to serve you relevant advertisements when you are visiting other sites on the Internet. These advertisements may be targeted to specific searches you conducted on OpenGDS during earlier browsing sessions.
- **Flash Cookies:** Our partners, who provide certain features on our site or display advertising based on your browsing activity, also use Local Shared Objects such as Flash cookies, and Local Storage such as HTML5, to collect and store content information and preferences. Various browsers may offer their own management tools for removing HTML5 local storage.

Controlling Cookies: We provide you with choice over the use of cookies as described in this Privacy & Cookies Policy. However, our Site is not currently configured to respond to Do Not Track signals. If you'd rather we didn't use OpenGDS cookies when you visit us, [click here](#) for how to configure your browser settings to reject cookies.

7. Access or Change Your Personal Data and Data Subject Rights

OpenGDS understands that you may want to change, access or delete your Personal Data. You may do so by accessing your profile or by contacting us at privacy@OpenGDS.com. To protect your privacy and security, we will verify your identity before auctioning a request, granting access or making changes to your Personal Data. Any request to access your Personal Data will be answered within 30 days of verifying your request. If you have created a profile on any of the services available on our Site, your e-mail address and password are required in order to access your profile information.

Depending on the jurisdiction where you reside, you may have specific rights under local legislation to: (i) request access to your Personal Data; (ii) request rectification of your Personal Data; (iii) request erasure of your Personal Data; (iv) request restriction of processing of your Personal Data; (v) request data portability; (vi) object to the processing of your Personal Data. Contact us at privacy@OpenGDS.com. if you have questions or would like to exercise such rights.

We will retain your information for as long as your account is active or as needed to provide you services. In addition, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

8. Cross-Border Data Transfer

Our Site is operated in the United States. If you are located outside the US, your Personal Data will be transferred to the US, a jurisdiction that may not provide an equivalent level of protection as your home jurisdiction. The cross-border transfer to the US is necessary for the conclusion or performance of a transaction that you are requesting, and/or for the establishment, exercise, and defense of legal claims. To the extent permitted by local law, your use of the Site or provision of any Personal Data constitutes your consent to the cross-border transfer of Personal Data and the other activities identified in this Privacy & Cookies Policy.

9. Children

Persons under the age of 18 are not eligible to use any services on our Site.

10. Changes to the Privacy & Cookies Policy

OpenGDS may revise this Privacy & Cookies Policy to reflect changes in the law, our Personal Data collection and use practices, the features of our Site, or advances in technology. 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 prominent notice on this Site prior to the change becoming effective.

11. How to Contact Us

Should you have any questions, concerns or comments, please contact us at privacy@OpenGDS.com.