

## Privacy Policy

Effective Date: June 19, 2023

This Privacy Policy ("Policy") describes how Inward Travel Inc. ("we," "us," or "our") collects, uses, processes, and protects the personal information of individuals ("you" or "users") who access or use our website, services, and related applications (collectively, the "Services"). We are committed to protecting your privacy and complying with all applicable privacy laws.

### **1. Information We Collect**

We may collect personal information directly from you or through automated means when you use our Services. The types of personal information we may collect include:

- **Contact Information:** Name, email address, phone number, and other contact details you provide when contacting us or applying to come on our trips.
- **Intake Information:** Information related to trip bookings, including travel preferences, dietary requirements, and other information necessary for your travel experience. This may include sensitive information such as medical information provided during the application and intake process, which will be strictly protected and never shared without your explicit consent.
- **Payment Information:** Financial information necessary to process payments for trip prepayments, trip deposits, or trips bookings, such as credit card details or other payment account information.
- **Communications:** Records of your interactions with us, including emails, chat messages, and other communications.
- **Website Usage Data:** Information about your use of our website, such as your IP address, device information, browsing activity, and cookies (as further described in Section 4).

### **2. Use of Personal Information**

We use the personal information we collect for the following purposes:

- **Providing Services:** To facilitate and fulfill trip bookings, communicate with you about your booking, and provide customer support.
- **Trip Experience:** To ensure your safety, well-being, and personalized experience during the trip. Sensitive information, such as medical information, will be used solely for the purpose of assessing your eligibility for trip participation and tailoring the trip experience accordingly.
- **Improving Services:** To analyze and improve our Services, develop new features, and enhance the user experience.
- **Communication:** To send you newsletters, updates, and promotional materials, subject to your consent and applicable laws.
- **Legal Compliance:** To comply with applicable legal obligations, including tax, accounting, and record-keeping requirements.

### **3. Sharing of Personal Information**

We may share your personal information with third parties in the following circumstances:

- **Service Providers:** We may engage trusted third-party service providers to assist us in delivering the Services, such as payment processors, accommodation providers, and healthcare professionals involved in the trips. These providers have access to your personal information only to perform their respective tasks on our behalf and are obligated to protect your information.
- **Legal Requirements:** We may disclose personal information if required to do so by law or if we believe in good faith that such disclosure is necessary to comply with legal obligations, protect our rights, or investigate fraud or security incidents.
- **Business Transfers:** In the event of a merger, acquisition, or sale of all or a portion of our assets, your personal information may be transferred as part of the transaction, subject to the same privacy protections outlined in this Policy.

#### **4. Cookies and Online Tracking**

We use cookies, web beacons, and similar technologies to collect information about your use of our website. This information is used to analyze trends, administer the website, track users' movements around the site, and gather demographic information. You can manage your cookie preferences through your browser settings.

#### **5. Data Security**

We take reasonable measures to protect your personal information from unauthorized access, disclosure, alteration, or destruction. We implement strict security measures to safeguard any sensitive information you provide, including medical information, and limit access to authorized personnel only. We also maintain technical and organizational safeguards to protect your personal information.

#### **6. International Data Transfers**

If you are located outside of Canada or the European Economic Area (EEA), your personal information may be transferred to and processed in countries that may not have the same level of data protection laws as your jurisdiction. We will take appropriate safeguards to protect your personal information when it is transferred internationally, such as entering into data transfer agreements based on standard contractual clauses approved by the European Commission or ensuring the receiving party is Privacy Shield certified (for transfers to the United States).

#### **7. Your Rights and Choices**

You have certain rights and choices regarding the personal information we collect and process:

- **Access and Rectification:** You have the right to access the personal information we hold about you and request corrections if it is inaccurate or incomplete.
- **Withdrawal of Consent:** If you have provided your consent for the processing of your personal information, you have the right to withdraw your consent at any time.
- **Data Portability:** You may request a copy of your personal information in a structured, commonly used, and machine-readable format, where feasible.

- Erasure and Restriction: You may request the erasure of your personal information or the restriction of its processing in certain circumstances.
- Objection: You have the right to object to the processing of your personal information based on legitimate interests or for direct marketing purposes.
- Marketing Communications: You can opt-out of receiving marketing communications from us by following the unsubscribe instructions provided in the communication or by contacting us directly.
- Cookie Controls: You can manage your cookie preferences through your browser settings or through the cookie consent banner on our website.

To exercise your rights or make any requests regarding your personal information, please contact us using the contact information provided in Section 9.

## **8. Retention of Personal Information**

We retain your personal information for as long as necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include the nature of the personal information, our legal obligations, and the need to resolve any disputes or enforce our agreements.

## **9. Contact Us**

If you have any questions, concerns, or requests regarding this Policy or our privacy practices, please contact us at [info@inwardtravel.com](mailto:info@inwardtravel.com); we will respond to your inquiries and requests promptly and in accordance with applicable privacy laws.

## **10. Changes to this Policy**

We may update this Policy from time to time to reflect changes in our privacy practices. We will post the revised version on our website with an updated effective date. We encourage you to review this Policy periodically for any updates.

By accessing or using our Services, you acknowledge that you have read, understood, and agreed to this Privacy Policy. If you do not agree with any part of this Policy, or our practices outlined herein, please discontinue your use of our Services.

Please note that this Privacy Policy only applies to the Services provided by Inward Travel Inc. and does not govern the practices of third-party websites, applications, or services that may be linked to or integrated with our Services. We encourage you to review the privacy policies of those third parties before providing them with your personal information.

Last Updated: June 19, 2023