

# PRIVACY POLICY

LAST UPDATED NOVEMBER 5, 2025

## INTRODUCTION

Welcome to BEYOND Travel Services Ltd. and BEYOND Hospitality Group Ltd.'s, each a group company of BEYOND Hospitality AG, joint privacy policy.

BEYOND Travel Services Ltd. and BEYOND Hospitality Group Ltd. respectively are (collectively referred to as "**BEYOND**") collaborating under the BEYOND Hospitality Group umbrella to operate a turnkey travel solution service referred hereinafter as "**BEYOND Travel 26**" to support attendees of the FIFA World Cup 2026™ in their travel needs. This policy, as updated from time to time, applies only to personal information processed by or on behalf of BEYOND. BEYOND, in coordination with chosen suppliers such as Travel Service Providers (e.g. hotel operators, airlines, etc.), collects certain information on behalf of these suppliers as is necessary and shares it with them. In this context, BEYOND and the Travel Service Providers, shall each be separate, independent controllers of the data shared with each other. Their respective privacy policies set out how each party will use this data

BEYOND respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data (including when you simply visit our website regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### PURPOSE OF THIS PRIVACY NOTICE

This privacy policy aims to give you information on how BEYOND collects and processes your personal data through your use of this website, including any data you may provide to us (through this website or otherwise) when you sign up to our newsletter, register an account, request a contact or a call back, register your interest in one of our products or services, receive any communication from us, purchase anything or take part in a survey, competition or giveaway.

This website is not intended for children, and we do not knowingly collect data relating to children (being a person under the age of 16 for the purpose of this privacy policy).

It is important that you read this privacy policy together with any other privacy policy or fair processing notice we may provide on specific occasions, when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### CONTROLLER

BEYOND is the data controller and responsible for your personal data (collectively referred to as "COMPANY", "we", "us" or "our" in this privacy policy).

If you have any questions about this privacy policy, including any requests to exercise your legal rights please contact us using the details set out below.

### CONTACT DETAILS

Full name of legal entity: BEYOND Travel Services, Ltd. and BEYOND Hospitality Group Ltd.

Name: BEYOND Hospitality Group Ltd.

Email address: sales.travel26@beyond-hospitality.com

Postal address: 50 Alderley Road, Wilmslow, Cheshire, SK9 1NY, England

You have the right to make a complaint at any time to the supervisory authority for data protection issues in your country of residence. We would, however, appreciate the chance to deal with your concerns before you approach your supervisory authority, so please contact us in the first instance.

BEYOND reserves the right to update and change our privacy policy as stated in Section 13 of this privacy policy. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## 2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows (please note that depending on your arrangement with us, we may collect some or all of these different kinds of personal data about you):

- **IDENTITY DATA** includes first name, maiden name, last name, username or similar identifier, title, date of birth, country of residence, nationality, language, passport number, passport details and gender.
- **CONTACT DATA** includes billing address, delivery address, email address and telephone.
- **FINANCIAL DATA** includes bank account and payment card details. Please note that whilst we may in limited circumstances receive payment card details from you, we do not store payment card details after payment has been made by you and the payment is received by us.
- **TRANSACTION DATA** includes details about payments to and from you and other details of products and services you have purchased from us.
- **TECHNICAL DATA** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **PROFILE DATA** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **USAGE DATA** includes information about how you use our website, products and services.
- **MARKETING AND COMMUNICATIONS DATA** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **ACCOMMODATION DATA** includes reservation details, room preferences, check-in/check-out dates, special requests related to accommodation services, and related operational information.

We also collect, compile, use, and share **AGGREGATED DATA OR PSEUDONYMISED DATA** such as statistical or demographic data for any purpose. Aggregated Data or Pseudonymised Data may be derived from your personal data but is not considered personal data in law as this data does NOT directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data or Pseudonymised Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data which will only be used in accordance with this privacy policy.

If you require disabled or assisted access to relation to your accommodation (e.g., accessible hotel rooms, wheelchair access, step-free access, wheel-chair accessible vehicles, etc.) or have special dietary requirements related to your stay, you may provide, and we may collect and store **SPECIAL CATEGORIES OF PERSONAL DATA** in the form of any disabilities or health conditions you may have. Apart from this we do not collect any other **SPECIAL CATEGORIES OF PERSONAL DATA** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

#### **IF YOU FAIL TO PROVIDE PERSONAL DATA**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to terminate our contract with you, but we will notify you if this is the case at the time.

### **3. HOW IS YOUR PERSONAL DATA COLLECTED**

We use different methods to collect data from and about you, including through:

**DIRECT INTERACTIONS.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, support by live chat or otherwise. This includes personal data you provide when you:

- apply for or purchase our products or services;
- create an account on our website;
- subscribe to our service or publications;
- request marketing information to be sent to you;
- enter a competition, giveaways, or survey;

- If you chat with us on our live chat service, or other equivalent interactive services; or
- give us some feedback or contact us via email or online forms

OUR AGENTS. You may have had direct interactions and/or placed orders with BEYOND's network of Agents. Our Agents, in fulfilling orders placed by you, will provide us with the categories of personal information listed above to carry out the services or complete purchase of products.

TOURNAMENT ORGANIZERS. You may have had direct interactions or requested more information about the Tournament through the Tournament Organizers, who then share your personal data with us to carry out your requests including purchase orders and to contact with further information about the Tournament.

AUTOMATED TECHNOLOGIES OR INTERACTIONS. As you interact with our website, we may automatically collect Technical Data about your location, equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy at [fifaclubworldcup25.hospitality.fifa.com](https://fifaclubworldcup25.hospitality.fifa.com) for further details

#### TECHNICAL DATA FROM THE FOLLOWING PARTIES:

- analytics and search information providers such as Google and Adobe; and
- advertising networks such as Contact, Financial and Transaction Data from providers of technical, payment and delivery services.

#### SUPPORT BY LIVE

If you chat with us on our live chat service, you will be sharing your email address with us for the purposes of sending you a transcript as well as identifying yourself to our support team. This is necessary to provide our service to you. In addition to this information, our live chat system will place a cookie in your browser which will persist until you quit your browser. This is required to ensure that your live chat can continue between separate page requests to our website. Please see our cookie policy at <https://travel.beyond-hospitality.com/> for further details. We also use records of live chats for staff training, to make sure we can offer you the best possible service.

Retention: We retain transcripts of all live chats (including name & contact details of the website visitor) for the purposes of auditing and training of staff. The duration of this data shall be consistent with BEYOND's data retention policy.

## 4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.  
Performance of Contract means processing your data and sharing your data with third parties (including hotel and accommodation partners) where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.  
Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [sales.travel26@beyond-hospitality.com](mailto:sales.travel26@beyond-hospitality.com)
- Where we need to comply with a legal or regulatory obligation.  
Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

<b>PURPOSE/ ACTIVITY</b>	<b>TYPE OF DATA</b>	<b>LAWFUL BASIS FOR PROCESSING INCLUDING BASIS OF LEGITIMATE INTEREST</b>
To register you as a new customer	(a) Identity (b) Contact (c) Technical (d) Profile (e) Contact	Performance of a contract with you
To process and deliver your order, including: (a) Sending our invoice and payments, fees, and charges (b) Collecting and recovering money owed to us (c) Delivering the goods and services to you	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about (i) changes to our terms or privacy policy, and (ii) your account and purchase (b) Asking you to provide feedback or take a survey (c) Providing you with our general customer service communications (d) Providing you with important last minute or emergency event communications (e) provide support via our live chat service.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Location (f) Site browsing	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To complete the reservation booking with the specific hotel or accommodation or other provider	(a) Identity (b) Contact (c) Financial (d) Assistance or accessibility-related data (e.g. mobility or dietary needs)	(a)(b)(c)(d) Performance of a contract with you (a)(b)(c) Necessary to comply with legal obligation (a)(b)(c) Necessary for our legitimate interests
To enable you to partake in a prize(b) Contact draw, competition, or survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)

To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Generally, we do not rely on consent as a legal basis for processing your personal data; other than we may in certain circumstances rely on consent as a legal basis for processing your personal data in relation to sending direct marketing communications to you via email (if you consent to them doing so). You have the right to withdraw consent to marketing at any time by contacting us at [sales.travel26@beyond-hospitality.com](mailto:sales.travel26@beyond-hospitality.com)

#### PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out above, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at [sales.travel26@beyond-hospitality.com](mailto:sales.travel26@beyond-hospitality.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

#### MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

#### PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have consented to it or requested information from us or entered into a contract with us where you have agreed to receive future promotional offers from us, or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have given us consent and/or authority to receive that marketing. As explained below, you may stop these promotional offers from us, at any time, by exercising your right to opt-out.

#### THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside BEYOND for marketing purposes, although we will also share data with third parties when necessary for non-marketing purposes as discussed in the table above without needing your consent.

#### OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by following the optout links on any marketing message sent to you or by contacting us [sales.travel26@beyond-hospitality.com](mailto:sales.travel26@beyond-hospitality.com) at any time or by logging into your account and checking or unchecking relevant boxes to adjust your marketing preferences. Where you opt out of receiving these marketing messages, we may still retain some of your personal data and contact you, when necessary, in relation to your contract, purchase or other transactions with us.

#### COOKIE POLICY

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy at <https://travel.beyond-hospitality.com/> for further details.

## CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at [sales.travel26@beyond-hospitality.com](mailto:sales.travel26@beyond-hospitality.com).

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. DISCLOSURES / SHARING OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties. Other companies in the BEYOND group of companies or affiliated companies who provide IT and system administration services and undertake leadership reporting.
- External Third Parties. Including the following:
  - Service providers acting as processors who provide payment, IT and system administration services, with whom we need to share your information in order to obtain payment from you or to provide the product or service you have requested.
  - Travel Service Providers including the hotel and accommodation operators or other service provider providing accommodation services with whom we need to share information to complete the reservation booking.
  - Connectivity Providers third party services providers that work with Service Providers to automate routing of reservation details to them.
  - Professional advisers or investigators acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
  - Law enforcement agencies or local authorities, or security services for the purposes of event security and safety.
  - Relevant tax authorities, regulators and other authorities acting as processors or joint controllers who require reporting of processing activities in certain activities.
  - Event or tournament organisers (including but not limited to FIFA).
  - Companies delivering goods or services to you (in cases where we act as an authorised reseller and/or sales agent).
  - Service providers who provide us with communication services such as live chat or email.
  - Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets to. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. INTERNATIONAL TRANSFERS

We share your personal data within the BEYOND Hospitality Group family of companies. This will involve transferring your data outside the European Economic Area (EEA) and/or outside your local jurisdiction.

Your personal data information may be processed in Switzerland and may be stored and used elsewhere depending on the location of the BEYOND group company or service provider who is permitted to access such information under these rules (and such locations may include countries which may not afford the same level of protection of such data as the country from which you provided the information).

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by seeking to implement at least one of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.

- Where we use certain service providers, we may use specific contracts approved by the European Commission which gives personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

For transfers of your personal data outside of the United Kingdom (UK), we apply the equivalent mechanisms and appropriate safeguards for the UK.

## **7. DATA SECURITY**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. However, the Internet is an open system, and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal information for improper purposes.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

If you communicate with us by email, you should note that the secrecy of Internet email is uncertain. By sending sensitive or confidential email messages or information which are not encrypted you accept the risk of such uncertainty and possible lack of confidentiality over the Internet.

## **8. DATA RETENTION**

### **HOW LONG WILL YOU USE MY PERSONAL DATA FOR?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and/or, where you have provided your consent, future marketing, and other related communications with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for up to six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data (please see Request erasure below for further information).

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **9. YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- **REQUEST ACCESS** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **REQUEST CORRECTION** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected (though we may need to verify the accuracy of the new data you provide to us). If we provide you with an account, you may review, correct, update or change your personal information at any time by accessing your account on <https://travel.beyond-hospitality.com/>
- **REQUEST ERASURE** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **OBJECT TO PROCESSING** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing

purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **REQUEST RESTRICTION OF PROCESSING** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **REQUEST THE TRANSFER** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **WITHDRAW CONSENT AT ANY TIME** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you or fulfil our contractual obligations. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us at [sales.travel26@beyond-hospitality.com](mailto:sales.travel26@beyond-hospitality.com)

#### **NO FEE USUALLY REQUIRED**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

#### **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

#### **TIME LIMIT TO RESPOND**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **10. AUTOMATED DECISION-MAKING**

Currently, we do not make any decisions based solely on automated processing, including profiling, which produces legal effects ("**Automated Decision-Making**"). In the event our position changes, we will update this privacy policy and inform you as required by applicable data protection laws.

### **11. THIRD-PARTY LINKS**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policy or their personal data collection practices. When you leave our website, we encourage you to read the privacy policy of every website you visit and exit the website immediately if you do not agree with the privacy policy. You acknowledge and accept that you are entering these third-party websites at your own risk.

### **12. CHILDREN AND PERSONAL**

Our products and services are not directed at children. We do not knowingly collect personal data from children under the age of 16, or such other applicable age of consent for privacy purposes in relevant individual jurisdictions, unless (a) we have obtained consent from a parent or guardian, (b) such collection is subject to a separate agreement with us or (c) the visit by a child is unsolicited or incidental. If you are a parent or guardian and believe your child has provided us with personal data without your consent, please contact us, and we will take steps to delete their personal data from our systems.

### **13. CHANGES TO THIS POLICY**

From time to time, we will update or modify this privacy policy, in our sole discretion, to reflect changes in legal and regulatory requirements and our business practices. The updated privacy will be posted to this website with a change to the "Last Updated" date (located at the top of this Policy). We encourage you to review this



page periodically to stay informed, especially before you provide any personal data. In circumstances where we make updates or modifications to this privacy policy that materially alter your privacy rights, we will provide additional notice, such as via email or with in-service notifications, as required by law. The updated privacy policy will take effect immediately after being posted or as otherwise notified by us. Your continued relationship with us or your continued use of our website, products or services after any such updates take effect will constitute acknowledgement and (as applicable) acceptance of the updated privacy policy

#### 14. QUESTIONS OR SUGGESTIONS

If you have questions or suggestions about this Privacy Policy or your personal data, please contact us at at sales.travel26@beyond-hospitality.com

#### **Supplemental Privacy Notice to Residents of California, Colorado, Connecticut, Virginia, and Utah**

*This Supplemental Privacy Notice applies to you only if you a natural person and you are a resident of California, Colorado, Connecticut, Virginia, or Utah. This Supplemental Privacy Notice is incorporated into and forms part of the BEYOND's Privacy Policy.*

This Supplemental Privacy Notice provides supplemental notices that are unique to the US states listed above.

##### 1. Categories of Personal Information We Collect, and How We Use and Share that Information

CATEGORY OF PERSONAL INFORMATION	CATEGORY OF SOURCE	BUSINESS OR COMMERCIAL PURPOSE(S) FOR COLLECTION	CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE
Personal identifiers	<ul style="list-style-type: none"> <li>• Directly from you or your agents</li> <li>• From your Organization</li> <li>• From your Vendors or Customers</li> <li>• From other third parties you choose to interact with</li> <li>• From our service providers</li> <li>• From public sources</li> </ul>	<ul style="list-style-type: none"> <li>• To provide our Service to you</li> <li>• To communicate with you</li> <li>• To verify your identity</li> <li>• To protect your account</li> <li>• To prevent fraud or illegal activity</li> <li>• Our marketing activities</li> </ul>	<ul style="list-style-type: none"> <li>• With our sales agents.</li> <li>• With other affiliates, subsidiaries or group companies</li> <li>• With our Service Providers including corresponding airlines, hotels and ground transportation companies.</li> <li>• With the Event Organizers / Tournament Sponsor.</li> </ul>

Financial information	<ul style="list-style-type: none"> <li>• Directly from you or your agents</li> <li>• From your Organization</li> <li>• From your Vendors or Customers</li> <li>• From other third parties you choose to interact with</li> <li>• From our service providers</li> <li>• From public sources</li> </ul>	<ul style="list-style-type: none"> <li>• To provide our Service to you</li> <li>• To verify your identity</li> <li>• To protect your account</li> <li>• To prevent fraud or illegal activity</li> </ul>	<ul style="list-style-type: none"> <li>• With other third parties you have consented to share data with.</li> </ul>
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During the past twelve (12) months, we have collected, used, and shared the following categories of personal information:

We collect the personal information described above from or through the following categories of sources:

- From you directly and indirectly, including when you access/visit the Site, purchase our products, use our products, request a demo of our products or sign up for a free trial, create an account with us, sign up to receive our newsletters and/or marketing communications, sign up for our webinars/events/forums or contact us; and
- From third parties, including our service providers who provide analytics services to help us understand the activity on the Site.

We collect and disclose the personal information described above for a variety of business purposes including:

- to provide the Site to you and to improve the Site;
- to complete the reservation booking with the selected hotel or accommodation operator, or other provider.
- to provide, operate, improve, and personalize the products and services we offer, and to give each user a more consistent and personalized experience when interacting with us;
- to register your account;
- to determine trends in consumption of our products and determine where our products may be in demand;
- to provide you with information about products and services that we may provide that we think may be of interest to you;
- to help deliver advertisements that are relevant to you and your interests and measure the effectiveness of our advertising campaigns;
- to provide you with updates about our products and services and with transactional information;
- for customer service and/or support, security (including for authentication purposes), to detect fraud or illegal activities, and for archival and backup purposes in connection with the provision of the Site;
- for analytics purposes;
- to fulfill your requests, such as those related to ordering and payment;
- to communicate with you, including through any chat function on the Site;
- to enforce our Website Privacy Policy, this U.S. Supplement or other applicable policies;
- to comply with applicable laws or respond to a subpoena, regulation, binding order of a data protection agency, legal process, governmental request or other legal or regulatory process;
- to enforce our rights, protect our property or protect the rights, property or safety of others;
- as needed to support external auditing, compliance and corporate governance functions.

We will retain the personal information described above for as long as necessary to fulfill the purpose for which it was collected, or as required by applicable laws or regulation.

## 2. Sensitive Personal Information

For accommodation related services, when we collect your passport data, geolocation, or financial details (such as your bank account or credit card numbers), we are deemed to be collecting data that is “sensitive” under state privacy laws. Where legally required, we will obtain your consent for collecting this information. For our California Users, we do not use or disclose sensitive personal information for any purpose other than as permitted by law, such as to provide our Service to you, to detect security incidents, and protect against malicious or fraudulent actions, nor do we use or disclose such information to build a profile about you.

### 3. Sales/Sharing

In the last 12 months, we have allowed third party ad providers to collect personal information from our website, mobile application and location services to provide them with targeted advertising and analytics. This practice may constitute a sale of personal information under certain state laws and, in California, may also constitute “sharing” (which is a term used to address the sharing of information for advertising purposes) of personal information.

In the last 12 months, we have also transferred personal information with our external third parties as described in the privacy policy, which may also constitute a sale of personal information under certain state laws and, in California, may also constitute “sharing” (which is a term used to address the sharing of information for advertising purposes) of personal information.

To the extent that our practices constitute a sale or sharing of your personal information, you have the right to opt-out of the sale or sharing of your personal information with the third parties (except for when sharing is necessary to provide service to you) in this privacy policy by selecting the cookie management tool located at the footer of the website, by contacting us direct, and by enabling Global Privacy Control on your browser or opting-out of cookies by clicking here.

### 4. Manage Cookies

Global Privacy Control (“GPC”) is a setting you can enable in your web browser to communicate your privacy preference for not having certain information about your webpage visits collected across websites. For all the details, including how to turn on GPC, visit <https://globalprivacycontrol.org/>. Our websites that link to this Privacy Notice recognize and respond to GPC signals.

### 5. Specific Information for California Residents

The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (“**CPRA**”) provides California residents with specific rights regarding their personal information. The below describes such rights and how you may exercise such rights, and our information practices, including the categories of personal information we collect, use, retain, disclose, sell or share, and how and why we collect, disclose, sell or share such information.

#### Your Rights

##### *Right to Know*

You have the right to request that we disclose what personal information we collect, use, disclose, sell or share. Specifically, you may request that we disclose to you the following:

The categories of personal information we have collected about you.

The categories of sources from which the personal information is collected.

The business or commercial purpose for collecting, selling or sharing personal information.

The categories of third parties with whom we disclose personal information.

The specific pieces of personal information we have collected about you.

You may also request that we disclose to you:

The categories of personal information that we have sold or shared about you and the categories of third parties to whom the personal information was sold or shared, by category or categories of personal information for each third party to whom the personal information was sold or shared.

The categories of personal information that we disclosed about you for a business purpose and the categories of persons to whom it was disclosed for a business purpose.

##### *Right to Request Deletion*

You have the right to request that we delete any personal information about you which we have collected from you. If it is necessary for us to maintain your personal information for certain purposes, we are not required to comply with your deletion request. If we determine that we will not delete your personal information when you request us to do so, we will inform you and tell you why we are not deleting it.

##### *Right to Opt-Out of Sale or Sharing of Personal Information*

We do not sell your personal information for monetary consideration. However, we may use third-party cookies for analytics and/or targeted advertising purposes. The collection of data through certain third-party cookies for our analytics or targeting advertising purposes may be considered a “sale” and is considered “sharing” under the CPRA. To opt-out of having your information sold and shared with third-party website analytics and digital advertising service providers for this purpose, please contact our Support Team at **sales.travel26@beyond-hospitality.com**

*Right to Correct Inaccurate Personal Information*

You have the right to request a business that maintains inaccurate personal information about you to correct that inaccurate personal information, taking into account the nature of the personal information and the purposes of the processing of the personal information.

*Right to Limit Use and Disclosure of Sensitive Personal Information*

We do not collect your sensitive personal information.

*No Discrimination*

You have the right not to be discriminated against because you exercised any of your aforementioned rights.

**6. Colorado, Connecticut, Virginia and Utah Residents**

The Colorado, Connecticut, Virginia and Utah privacy laws provide the following rights to “consumers” (i.e., state residents who act in an individual or household context and exclude individuals acting in a commercial context):

Confirm whether or not an entity is processing your personal information and access such personal information;

For Virginia, Colorado and Connecticut residents, correct inaccuracies in your personal information, taking into account the nature of the personal information and the purposes of the processing of your personal information;

Delete personal information provided by, or, for Virginia, Colorado and Connecticut residents obtained about, you;

Obtain a copy of your personal information that an entity processes, in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance, where the processing is carried out by automated means; and

Opt out of the processing of personal information for purposes of: Targeted advertising; The sale of personal information; or, for Virginia, Colorado and Connecticut residents, profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.

Under the Colorado, Connecticut, Virginia and Utah privacy laws, we generally act as a “Controller” for our customers and maintain and store the personal information of consumers on our customers’ behalf when our customers use our products. Accordingly, if you are a consumer of one of our customers, please submit your requests to exercise your rights directly to us.

If you have questions or suggestions about this US Supplemental Notice to the Privacy Policy or your personal data, please contact us at **sales.travel26@beyond-hospitality.com**