



## **Privacy Policy**

This Privacy Policy sets out how we, Chan Brothers Express Pte Ltd, and associated companies (hereafter collectively referred to as “**the Companies**”) collect, use, disclose, transfer and store your Personal Information (as defined below). We are committed to protecting your privacy. The Companies may share your Personal Information with each other and use it in a manner and for purposes which are consistent with this Privacy Policy and consistent with the Personal Data Protection Act 2012 of Singapore. We may combine your Personal Information with other information for the purposes of providing products and services to you, or to improve our products, services, content and advertising.

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## Collection of Personal Information

In General. We may collect, use, disclose, transfer and store any information you enter on our website or give us through various means, including telephone calls, emails, enquiries or bookings at our sales office, SMS, fax, post, and any platforms used by the Companies from time to time (collectively the “**Platforms**”). The information which we collect includes information that can identify you (“**Personal Data**”), including, but not limited to, your name, contact numbers, postal and email addresses, contact preferences, and, if you make a reservation with us, your credit card information. We may also request you to provide us with information on your travel preferences, the loyalty, frequent flyer and/or car rental programmes which you participate in, and feedback, testimonials, photographs and videos of the trip which you booked with us (together with the Personal Data collectively referred to as the “**Personal Information**”). You are not required to provide the Personal Information that we have requested, and if you choose not to provide the requested Personal Information, we may be prevented from providing certain products or services to you.

Personal Information Relating To Another Person. When you make a reservation with us on behalf of a travel companion or another person, we will request for the Personal Information of that individual. You should obtain the consent of such other individuals prior to providing their Personal Information to us. Any request to view or change their Personal Information provided in relation to the reservation which you have made can only be made through you or your account with us.

Surveys and Contests. We may request Personal Information relating to you through surveys or contests which we conduct from time to time. Participation in these surveys or contests is completely voluntary and you have a choice as to whether or not to provide the Personal Information we have requested through the survey or contest. Personal Information collected through surveys will be used for the purposes of monitoring or improving the use and satisfaction of our services. Personal Information collected through contests will be used to notify winners and award prizes.

Call Monitoring. Your telephone calls with us may be recorded or monitored for the purposes of quality control and staff training. The call recordings will be retained by us for as long as reasonably necessary and will then be deleted. Any Personal Information obtained from you during the call will be treated in accordance with the provisions of this Privacy Policy.

## How We Use Your Information

General. We will use your Personal Information for the following purposes:

- (a) to provide you with the products and services you request;
- (b) to provide you with travel confirmation and updates;
- (c) to manage your account, including processing bills and providing travel notifications;
- (d) to communicate with you in general;
- (e) to respond to your questions and comments;
- (f) to allow us to contact you for customer service, if necessary;
- (g) to measure interest in and improve our products, services, and website;
- (h) to notify you about special offers and travel-related products and services that may be of interest to you;

- (i) to customise your experience on our website;
- (j) to reward you as part of any reward and recognition programme you choose to join;
- (k) to resolve disputes, collect fees, or troubleshoot problems;
- (l) to prevent potentially prohibited or illegal activities;
- (m) to enforce our Terms and Conditions when you make a travel booking with us; and
- (n) as otherwise notified to you at the point of collection.

**Credit Card Information.** We use your credit card information for the purpose of completing the travel bookings which you make with us.

**Direct Marketing.** We want to make it easy for you to take advantage of travel-related opportunities with us. One way we do this is by sending marketing messages to you through email, SMS, fax or post that contain information about your travel-related interests and travel-related special offers which are available with us. Please note that you can withdraw your consent for us to send marketing messages to you. Please refer to the opt-in and opt-out policy section of this Privacy Policy which sets out how you may set your preferences in relation to such marketing messages.

#### **With Whom We Share Your Personal Information**

We may share your Personal Information with the following third parties, some of whom may be located overseas, and a result, may require us to transfer your Personal Information overseas:

- (a) **Third Party Suppliers** such as hotel, airline, car rental and activity providers, who fulfil your travel reservations with us. Please note that these third party suppliers may contact you as necessary to obtain additional information about you in order to facilitate the travel reservation which you have made through us.
- (b) **Third Party Vendors** who provide services or functions on our behalf, including credit card processing, business analytics, customer service, marketing, distribution of surveys or contest programmes and fraud prevention. We may also authorise third party vendors to collect Personal Information on our behalf, including as necessary to operate features of our Platforms, or to facilitate the delivery of online advertising tailored to your interests. Third party vendors have access to and may collect Personal Information only as needed to perform their functions and are not permitted to share or use the Personal Information for any other purpose.
- (c) **Business Partners** with whom we may jointly offer products or services. If you choose to receive information about these products or services, we may share information about you, including your Personal Information, with those third party partners so that they can contact you directly by email or post about their products and services.

We will only disclose your Personal Information with your consent (whether implied or express), and will take reasonable steps to ensure that the third parties to whom we have disclosed your Personal Information are also legally bound to protect the privacy of your Personal Information.

We may also disclose your Personal Information:

- (a) Where disclosure is necessary to comply with applicable laws, governmental or other regulation or the requirements, orders, directions, instructions or notices of any regulatory authority or legal processes.
- (b) When we believe it is appropriate to investigate, prevent or take action regarding illegal or suspected illegal activities; to protect and defend the rights and property of the Companies.



(c) To effect a corporate transaction, in connection with the sale, merger, acquisition, spin-off or other corporate reorganisation of the Companies.

### **Opt-in and Opt-out Policy**

We offer you the ability to opt-in to or opt-out from (as the case may be) receiving marketing messages in relation to our products and services or the products and services of third parties by emailing us at [privacy-cbe@chanbrothers.com.sg](mailto:privacy-cbe@chanbrothers.com.sg).

While we respect your decision to opt out of receiving marketing information, you understand and accept that this may in some cases impact the availability of services and the quality of services that we may provide to you and may mean that the services provided to you (if possible at all) by us may not be customised for your use, may be less user-friendly and less efficient.

### **Terms Specific to Our Website**

#### Cookies and Other Web Technologies

We automatically collect some information about you and your computer when you visit our website, such as your IP address, web browser software (such as Firefox, Internet Explorer or Safari), referring websites, and information about your online activities on our website, such as information viewed and purchases made. One of our goals in collecting this automatic information is to help customise your user experience.

As a visitor to our website, you will be assigned a permanent cookie file on your computer's hard drive. You can always choose not to receive a cookie file by enabling your web browser to refuse cookies or prompt you before accepting a cookie. Please be advised that, by refusing to accept a cookie, you may not be able to access many travel services and planning tools offered by our website.

In addition to the above cookies, we use local shared objects, also referred to as flash cookies, on our website. These are used to enhance your user experience, for example, by storing your user preferences and settings, such as your volume/mute settings, and in connection with animated content on our website. Local shared objects are similar to browser cookies, but can store data more complex than simple text. By themselves, they cannot do anything to or with the data on your computer. Like other cookies, they can only access personal identifiable information that you have provided on our website, and cannot be accessed by other websites.

Our website may also use web beacons (also known as clear gifs or pixel tags), which are tiny graphics with a unique identifier, similar in function to cookies, that are placed in the code of a web page. We use web beacons to monitor the traffic patterns of users from one page within our website to another, to deliver or communicate with cookies, to understand whether you have come to our website from an online advertisement displayed on a third-party website, and to improve website performance. We may also allow our third-party vendors to use web beacons to help us understand which emails have been opened by recipients and to track the visitor traffic and actions on our website. This helps us to measure the effectiveness of our content and other offerings.

#### Display of Tailored Advertising on Our Website

The advertisements you see on our website are served by us or by our service providers. But we also allow third parties to collect information about your activities on our website through cookies and other web technologies. These third parties include (1) business partners, who collect information when you view or interact with one of their advertisements on our website; and (2) advertising networks, which collect information about your interests when you view or interact with one of the advertisements they place on many different websites on the Internet. The information gathered by these third parties is used to make predictions about your characteristics, interests or preferences and to display advertisements on our website and across the internet tailored to your apparent interests.



We do not permit these third parties to collect personal information about you (such as email address) on our website, nor do we share with them any personal information about you.

### Links to Third Party Websites

Our website may contain links to websites owned or operated by third parties who offer travel-related products and services which do not operate under this Privacy Policy, such as websites owned or operated by travel insurers. If you choose to use a link on our website to access a third party website, we may share information about your activities on our website (collected through cookies and other web technologies) with the owner or operator of the third party website in order for them to provide you with a customised user experience on their website. These third party websites contain their own privacy policies and practices and their owners or operators are responsible for informing you about their privacy policies and practices. We are not responsible for the privacy policies and practices of websites owned or operated by third parties that are linked to our website. We recommend that you examine the privacy statements of such third party websites to understand how they handle any information which they collect from you and contact its owner or operator if you have any questions or concerns about the third party website.

If you have any questions about our website, please email us at [privacy-cbe@chanbrothers.com.sg](mailto:privacy-cbe@chanbrothers.com.sg)

### **Terms Specific to Mobile Devices**

When you use a mobile device (whether iOS or Android) to access our mobile application or our website, we will collect, use, disclose, transfer and store Personal Information relating to you in the same way and for the same purposes as when you use a computer to access our website. We also collect, use, disclose, transfer and store the following additional information from your use of a mobile device to access our website, or our mobile application, in order to optimise our mobile application and website to minimise data usage:

The distinction between mobile application and website is not clear in points a and b and may need to be clarified

(a) Use of Mobile Device to Access Website We collection information on the areas of our website which you access through your mobile device, which allows us to refine the arrangement of our website content for compatibility with mobile devices. This information is collected anonymously and we cannot identify you from this.

(b) Use of Mobile Application Our mobile application records the unique device identifier of your mobile device (called a "UUID" for iOS mobile devices and the "device ID" for Android mobile devices). We will only use the UUID/device ID on the first opening of our mobile application on your mobile device to confirm to various third parties that the mobile application has been downloaded and opened.

(c) Mobile Application Error If our mobile application encounters a problem and produces an error, the mobile application will send us an error report so we can investigate the error and improve the mobile application. These error reports contains information on your mobile device type and version, the UUID/device ID of your mobile device, the time the error occurred, the feature being used when the error occurred, and the state of the application when the error occurred. If you do not want us to collect and use such information on your mobile device, please either disable this functionality on your mobile device (where the mobile application allows you to do so), or remove the mobile application from your mobile device.

### **How We Protect Your Personal Information**

We want you to feel confident about using our Platforms and we are committed to protecting the Personal Information we collect. We have implemented reasonable administrative, technical, and physical security procedures to help protect the Personal Information you provide to us. For example, only authorised employees are permitted to access your Personal Information and they may do so only for permitted business functions. In addition, we use encryption when transmitting sensitive Personal Information (e.g., credit card details) between your system and ours, and we employ firewalls and intrusion detection systems to help prevent unauthorised persons from gaining access to your Personal Information.



### **Accessing and Updating Personal Information**

You can access and update the Personal Information which we hold about you. In order to request access to or update your Personal Information, please email us at [privacy-cbe@chanbrothers.com.sg](mailto:privacy-cbe@chanbrothers.com.sg).

We will use reasonable endeavours to ensure that the Personal Information which we hold about you is accurate, complete and up-to-date whenever we collect or use it. This means that from time to time, we will ask you to tell us if there are any changes to your Personal Information. If you find that any Personal Information which we hold about you is incorrect, please notify us immediately.

### **Changes to Privacy Policy**

We reserve the right to amend this Privacy Policy at any time. We will notify you of any changes to this Privacy Policy by sending a notice to the email address you have provided to us or by placing a prominent notice on our website.

### **Contacting Us**

If you have questions relating to your Personal Information or our Privacy Policy, you can email us at [privacy-cbe@chanbrothers.com.sg](mailto:privacy-cbe@chanbrothers.com.sg).

Thank you for taking the time to understand our Privacy Policy.

This Privacy Policy is effective as of **28 May 2014**.