

EU General Data Protection Regulation

Who is Via?

EBIX Travels Private Limited (formerly known as FlightRaja Travels Private Limited) ("**Via**") is an online travel, accommodation, and allied reservation service provider for its customers and agents ("**End Users**"). Via owns and operates the websites, <http://in.via.com> and <http://www.viaworld.in> (collectively the "**Websites**") and mobile applications (on various platforms including Android, iOS and Windows) (collectively called ("**Mobile Applications**"). The Websites and the Mobile Applications enable End Users to make travel and accommodation related bookings and reservations. For providing the Services (as defined herein) Via has entered into contracts/arrangements with various holiday, hotel, transport and payment gateway service providers ("**Third Party Service Providers**").

Privacy Policy and its overview

This privacy policy ("**Privacy Policy**") describes Via's policies and procedures on the collection, use and disclosure of the information provided by End Users and the Visitors (as defined herein) of the Websites and the Mobile Applications (together referred to as "Users"). Via shall not use the Users' information in any manner except as provided under this Privacy Policy. Every User who accesses or uses the Websites or the Mobile Applications shall be subject to this Privacy Policy.

The Privacy Policy for the Users/Visitors of European Union (EU), European Economic Area (EEA), and Switzerland shall be governed as per EU General Data Protection Regulation ("GDPR") For the Citizens of European Union (EU), European Economic Area (EEA), and Switzerland Via shall be the controller of the personal data provided to, or collected by or for, or processed in connection with Via's Services

Via does not collect or otherwise Process any Personal Information which may be deemed to be sensitive under GDPR in the normal course of our business.

The User's visit to the Websites, use of the Mobile Applications and any dispute over privacy is subject to this Privacy Policy and Terms of Use. Via may update this privacy policy at any time, with or without advance notice. In the event there are significant changes in the way Via treats User's personally identifiable information, Via will display a notice on the Websites, Mobile Application or send Users an email, as provided for above. Unless stated otherwise, Via's current privacy policy applies to all information that Via has about Users and their account (if applicable). Notwithstanding the above, Via shall not be required to notify the Users of any changes made to the privacy policy. If a User uses the Websites or the Mobile Applications after notice of changes have been sent to such User or published on the Websites or the Mobile Applications, such User hereby provides his/her/its consent to the changed practices.

Types of information Collected by Via

Via may collect following data

- **PERSONAL DATA** – This is the information shared by the user which includes but is not limited to user ID , password , Email ID , Contact number , gender, date of birth etc. This may include banking details such as credit card , debit card and any other billing or payment cycle shared by user/visitor .
- **BOOKING DATA**- This will includes but not limit to data such as travel dates , number of passenger, PNR , destination , travel preference etc shared by the User/visitor.

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- **LOCATION INFORMATION:** location data that describes the precise geographic location of your device
- **OTHER INFORMATION:** We may also collect some other information including but not limited to, Data either created by you or by a third party and which you wish to store on our servers such as image files, documents etc.

Data Received from any third party including social media channels, including but not limited to personal or non-personal information from your linked social media channels (which include but are not limited to name, email address, friend list, profile pictures or any other information that is permitted to be received as per your account settings) as a part of your account information.

Information pertaining any other traveler(s) for who you make a booking through your registered Via.com account. In such case, you must confirm and represent that each of the other traveler(s) have agreed to have the information shared by you disclosed to us.

What is the Purpose of Data Collection ?

In a broad sense via collect Personal data for completing your travel booking and to for future interaction with users/ visitors.

- **BOOKING** - The information collect by via is used to complete the booking transaction and making reversion for the users/visitors using the information such as payment card details (encrypted), card holder name shared by users/ visitors, Via also share name, location and such personal details with the Service Provider (third party) to make a reservation.
- **FUTURE INTERACTION** - The details shared are used for other purposes including but not limiting to confirm your reservations with respective service providers;, keep you informed of the transaction status, send booking confirmation, send any updates or changes pertaining the booking made, allow our customer service to contact you, if necessary, customize the content of our website, mobile site and mobile app, request for reviews of products or services or any other improvements;, send verification message(s) or email(s).

We may also use data collected directly or indirectly for marketing and promotional activates, research, programs and surveys.

Security of the data shared/collected

Via has a very strict and stringent security policies , rules and measures in place to protect the loss, misuse, and alteration of the information under our control.While no website can guarantee security, Via has implemented appropriate administrative, technical, and physical security procedures to help protect the personal information shared with Via .

We use and have in place Secure Sockets Layer and Payment Card Industry Data Security Standard through which data transmitted by encrypting or scrambling .

How long the Data is stored ?

Via takes reasonable steps to ensure that your User Information is only retained as long as they are needed.

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- 1) For the registered users , Via maintain the data till the time user request Via to remove the data through written or oral communication.
- 2) For New users/ visitors Via has have 30 day cookies policy

The criteria for determining the duration for which we will keep User Information are as follows: we will retain copies of your User Information in a form that permits identification only for as long as is necessary in connection with the purposes set out in this Policy, unless applicable law requires a longer retention period. Unless there is a specific legal requirement for us to keep the information, we plan to retain it for no longer than is necessary to fulfill a legitimate business need.

Third Party- data shared and purpose

INFORMATION DISCLOSED TO THIRD PARTY

In relation to the data shared by the Users/ Visitors, we may disclose your data to following :-

1) Service Provider / Supplier :-

Via provides intermediary services and is not the ultimate Service provider therefore to complete the booking and enable user to enjoy better service via needs to share information with the Service Provider/ Supplier such as flight and bus operator, Hotel, car rental, IRCTC etc

2) Business partners :-

Via may share certain Personal data with via's business partners for offer certain products or services which may allow the user/visitor to have better travel experience , this business partner may include but not limit to co-branded credit cards, travel insurance, insurance cover against loss of wallet, banking cards or similar sensitive information etc.

3) Partners, Subsidiaries , Affiliated and Sister Concern Companies-

Via may disclose data to its Partners, Subsidiaries , Affiliated and Sister Concern Companies to detect and prevent identity theft, fraud and other potential illegal acts and also correlating related or multiple accounts to prevent abuse of the Services, and facilitating joint or co-branded Services requested by Users, where such Services are provided by more than one corporate entity.

We may disclose to third party services certain personally identifiable information listed below:

information you provide us such as name, email, mobile phone number.

information we collect as you access and use our service, including device information, location and network carrier.

This information is shared with third party service providers so that we can:

personalize the app for you

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perform behavioral analytics

For the User or Visitor of the European Union (EU), European Economic Area (EEA), and Switzerland No third parties, other than those that you chose to transact with over our products and services, have access to your personal data unless authorized by law, for example a regulatory body. We take all reasonable steps to ensure that your personal data is processed securely

Via will not disclose any Personal Information to governmental institutions or authorities unless such disclosure is requisitioned under any law or judicial decree or when Via, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the Terms of Use.

What are Users/ Visitors Rights ?

The User/ Visitor of the European Union (EU), European Economic Area (EEA), and Switzerland, can exercise following rights 1) the right to be informed; 2) the right of access; 3) the right of rectification; 4) the right to erasure; 5) the right to restrict processing; 6) the right to data portability; 7) the right to object; and 8) the right of automated decision-making in profiling. 9) Filing Complaints with for Data Protection .

Via may request User/ Visitor for proof of identity before we can give effect to these rights

Cookies and Session out

The Websites and the Mobile Applications use temporary cookies to store certain data. Via does not store personally identifiable information in the cookies. Information collected by Via, by any means whatsoever, that does not personally identify the User as an individual (such as, patterns of utilization described above) is exclusively owned by Via and may be used by Via and Third Party Service Providers for the technical administration of the Websites, Mobile Applications, User administration, research and development, business development, statistical analysis and business intelligence purposes. Additionally Via may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates.

A User can set or amend his/her/its web browsers to delete or disable cookies. If a User chooses to disable cookies on his/her/its computer or mobile telecommunication device, it may impair, degrade or restrict access to certain areas of the Websites or the Mobile Applications. Merely closing the web browser should ordinarily clear all temporary cookies installed by Via. However, Users are encouraged to

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use the "clear cookies" functionality of their browsers to ensure deletion, as Via cannot guarantee, predict or provide for the behavior of the equipment of all the Users of the Websites.

This Privacy Policy applies to the Websites, Mobile Applications and Services that are owned and operated by Via. Via does not exercise control over the websites displayed as search results or links from within its Services. These other sites may place their own cookies or other files on the Users' computer, collect data or solicit Personal Information from the Users, for which Via is not responsible or liable. Accordingly, Via does not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites, nor does Via guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, messages or other materials available on such websites. The inclusion or exclusion does not imply any endorsement by Via of such websites, the websites' provider, or the information on the website. Via encourages the Users to read the privacy policies of such websites.

When a User visits or uses the Websites or the Mobile Applications by or through a mobile device, Via may access, collect, monitor and/or remotely store "location data," which may include global positioning system coordinates (e.g. latitude and/or longitude) or similar information regarding the location of the mobile device. Location data does not collect or share any personally identifiable information about the User.

If you, as a Visitor, have inadvertently browsed any other pages of the Websites prior to reading the privacy statements set out herein, and you do not agree with the manner in which information is obtained, stored or used, merely quitting this browser application should ordinarily clear all temporary cookies installed by Via. All visitors, however, are encouraged to use the "clear cookies" functionality of their browsers to ensure such clearing / deletion, as Via cannot guarantee, predict or provide for the behaviour of the equipment of all the visitors of the Websites.

Automatic Logging of Session Data:

Every time users access the Website users session data gets logged. Session data consists of the User's IP address, operating system and type of browser software being used and the activities conducted by the User while on the Website. We collect session data because it helps us analyze User's choices, browsing pattern including the frequency of visits and duration for which a User is logged on. It also helps us diagnose problems with our servers and lets us better administer our systems. The aforesaid information cannot identify any User personally. However, it is possible to determine a User's Internet Service Provider (ISP), and the approximate geographic location of User's point of connectivity from the IP address.

Permission Required for using App
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Android and IOS

ACCESS_WIFI_STATE and NETWORK_STATE This helps via to improve users / visitors experience such as more detailing on maps , hotel/ flights/ package options to choose from, etc.

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ACCESS_FINE_LOCATION- This helps via to provide better services and deal for fetching current location in case nearby hotel search , via request for explicit permission without which via will not be able to access visitors/users location .

WRITE_EXTERNAL_STORAGE This permissions is to allow Via to map visitors/users data such to download the E-ticket to be saved to your phone's external storage so that visitors/users doesn't need to re-download ticket every time .

CONTACTS Contact details are synced to allow users/visitors to recharge phone and share referral via request for explicit permission without which via will not be able to access visitors/users location.

RECEIVE_SMS- Allows an application to receive SMS messages to receive OTP for securing the transaction so that there is no fraudulent transaction and for security login and registration.

CALENDAR- This permission enables us to put your travel plan on your calendar.

Opt-Out Policy

The subsidiaries and Third Party Service Providers with whom Via may share Personal Information provided by Users are not permitted to market their own services or send promotional e-mails to Users. Via provides all Users with the opportunity to opt-out of receiving non-essential, promotional, or marketing-related communication from itself or its partners. These settings can be found on Websites.

If a User wishes to remove his/her/its contact information from all Via lists and newsletters, the User can click on the "unsubscribe" link or follow the instructions in each e-mail message. Alternatively, the User can contact Via at care@via.com

Residents user of European Union (EU), European Economic Area (EEA), and Switzerland may also have the right to contact on to raise complaint to Data protection Officer at Care@via.com
