# Visa Concierge Mobile App Privacy Policy Highlights

## **UPDATED AS OF: 19 September 2018**

# [Key] Information We Collect

- Your name and contact information, and information you provide at enrolment and when requesting for concierge services
- Enrolment information
- Location-based information

# **Core Ways We Use Information**

- To enable the functionality you use through the Visa Concierge Platform
- To contact you with details or updates about your requests

### **Your Choices**

To modify your profile information or your options, please go to the My Profile or Settings section on the left hand side burger menu of your Visa Concierge app. Alternately you can contact your Concierge via email or phone with your requests.

### Questions?

If you have any questions or concerns about this Privacy Policy, the practices of Visa Concierge, or your experiences with the Platform, please contact us at concierge@visainfiniteasia.com, concierge@visasignature-asia.com or concierge@visaplatinum.com, or write to us/phone us at:

Address: Visa Worldwide Pte Limited, 71 Robinson Road #08-01, Singapore 068895

Attention: Legal Officer

Phone contact:+65 6671 5800 Contact person: Legal Officer

# Visa Concierge Mobile Application Privacy Policy

Thank you for using the Visa Concierge website or mobile app. Visa Concierge is a concierge service intended to enhance your Visa cardholder experience. Visa Worldwide Pte Limited (" Visa," " us," " we " or similar pronoun) owns and operates the Visa Concierge website and mobile app ("Visa Concierge Platform") itself or through third party service providers.

Visa Concierge is described in more detail in the Visa Concierge Terms of Service (available in the left hand side burger menu in your Visa Concierge App). We highly value and respect the privacy of the personal information we obtain from you in connection with your use of Visa Concierge, including but not limited to your name, address, account numbers and other information that can be used to individually identify you or any third party (collectively, " **Personal Information** ") and we have created this privacy policy (the " **Privacy Policy** ") to inform you about how we collect, use and share your Personal Information, and our privacy practices in general, and we will obtain your consent for our collection, use and sharing (including transfer or

disclosure) of your Personal Information as set out in this Privacy Policy if such is required under applicable law. As used in this Privacy Policy, the term "Visa Concierge" includes the Visa Concierge app and other Visa concierge channels operated by Visa that reference this Privacy Policy (each, a " site "). Visa Concierge uses information that we obtain from you in connection with your use of Visa Concierge and from other third parties for purposes as described in this Privacy Policy, including to enable you to participate in and take advantage of the various Visa Concierge features and functionality, for our own internal analysis, and to make Visa Concierge and our other programs and features more useful and interesting to you.

### PERSONAL INFORMATION WE COLLECT

Visa may collect information in a number of ways in connection with Visa Concierge, including, without limitation, as follows:

- When you enroll in Visa Concierge, set up a Visa Concierge account (" Account ") and
  make changes from time to time, we will collect the Personal Information you voluntarily
  choose to provide, such as your name and mailing, shipping and email addresses, phone
  numbers, birthdates, driver's license numbers, and passport numbers. We may also
  collect your security questions and answers, username, password and other
  demographic information and preferences.
- We collect credit, debit, prepaid or other payment card or other financial account information you provide to us in connection with Visa Concierge (" Card Details ").
- We collect rewards program numbers, frequent flyer numbers, and other loyalty program numbers you provide to us in connection with Visa Concierge ("Loyalty Numbers").
- When you make a purchase through Visa Concierge or you otherwise provide purchase information to Visa Concierge, we may collect certain purchase and shipping tracking information.
- When you ask us to send goods or services to a third party ("friend"), we collect we collect certain Personal Information from you about your friend for the purpose of providing the fulfilling your request. If you are going to provide personal data of any friend to us as part of Visa Concierge service you will ensure that the friend is aware of our policy. Where we require consent from you in respect of certain use of any Personal Information, including your or any Personal Information of your friend, you will obtain and will have obtained the corresponding consent from such friend before you provide the Personal Information to us.
- When you ask us a question, we collect email address or other contact information you choose to provide.
- We collect information you voluntarily submit when participating in one of our various services, programs or surveys.

Other Personal Information that we collect include:

- Age Range
- information you provide to us that will allow us to provide the requested Visa Concierge service
- Mobile number
- Biometric data
- Location information
- Passwords

We may collect other non-personal information about your use of the Visa Concierge Platform such as:

How you use the Platform, including your use of its features and functionality. 

IP
address and information about the device you use to access the Platform.

We may collect or compile non-Personal Information about Platform users such as enrollment numbers or demographic group information on an aggregated and anonymized basis.

You are not obliged to provide us with Personal Information unless we indicate it as an obligation. It is stipulated that failure to provide certain information may affect your browsing on the site as well as the services that we offer.

### HOW WE USE THIS INFORMATION

We collect, retain and use Personal Information for the following purposes:

To process your requested transactions and bookings.

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To email or message you with important information and updates about Visa Concierge and your Visa Concierge Account, including confirmation of transactions and bookings.

To generally provide the features and functionality of Visa Concierge to you.

To conduct surveys.

To respond to questions and comments.

To improve, enhance and tailor Visa Concierge for you, and to improve and enhance the overall Visa Concierge experience for all Visa Concierge users.

To send you commercial and promotional messages and offers through any medium for you to learn more about Visa Concierge and various services and benefits available. However, we will not use your Personal Information for such purposes unless we have received your consent.

We may also use your information for purposes disclosed at the time you provide the information or otherwise with your consent.

### HOW WE SHARE PERSONAL INFORMATION

Visa may disclose to third parties all categories of Personal Information (and location information if you choose to use a location-based function of the Platform, as applicable) that it collects as follows:

- Provision of Services: We disclose your Personal Information to third parties where necessary to provide Visa Concierge services to you.
- At Your Request: We disclose your Personal Information to a third party whenever you request us to do so.
- Business transfers: If a third party acquires all or substantially all of Visa's assets, your
  Personal Information, aggregated information, and any other information that we have
  collected in connection with Visa Concierge may be transferred to such third party as part
  of our business assets. Also, if any bankruptcy or reorganization proceeding is brought by
  or against us, all such information may be considered one of our assets and may be sold
  or transferred to third parties.

- Disclosure of Personal Information for legal purposes and protection of Visa and others: We reserve the right to share your Personal Information with third parties if required to do so by law, or if we believe such action is necessary in order to: (1) conform to the requirements of the law or comply with legal process served upon us; (2) protect or defend our legal rights or property, Visa Concierge, or our users; or (3) investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, or violations of the Visa Concierge Terms of Service.
- Service Providers: We use third-party service providers to perform certain services on our behalf, such as processing, storing, maintaining and transmitting data, processing and fulfilling email and other promotional campaigns, and providing marketing assistance, web analytics and data analysis. We may provide your Personal Information to these third-party service providers when the information is necessary for them to perform their duties. These third-party service providers are contractually restricted from using Personal Information for any other purpose and required to comply with all applicable laws with respect to the Personal Information they receive. The service providers may be located outside your place of habitual residence.
- Government Agencies: We will disclose your Personal Information to a government agency if required to do so by law.
- As Otherwise Permitted By Law. We may disclose your Personal Information to third parties as otherwise permitted by applicable law.

## **Automatically collected non-Personal Information**

When you use Visa Concierge, we also may collect certain standard information from your browser and personal computer that websites often collect, such as your IP address, your browser information (including browser type, capabilities and language), your operating system and the date and time you accessed Visa Concierge. We also capture the country from which the visit came and the paths taken as you move from one website or webpage to another website or webpage (i.e., your "click stream" activity). We may use certain or all of this information to identify you in future visits to the Platform. We may group some or all of this information into aggregate data in order to describe the use of Visa Concierge by our users to our existing or potential business partners, sponsors, advertisers or other third parties, or in response to a government request. We may also group demographic information that we collect from Visa Concierge users into aggregate data for the same purposes. We reserve the right to use and share any such nonPersonal Information with third parties for any lawful purpose.

Except for the purpose of identifying you in future visits to the Platform, Visa does not typically associate such non-Personal Information with any individual. However, to the extent Visa associates your Personal Information with non-Personal Information within our database, we will treat all the associated information as Personal Information under this Privacy Policy. Except as noted in this Privacy Policy, we do not share this associated information with third parties.

# Browsing and the use of cookies, Web beacons and other tracking technologies; mashups and log

Visa uses cookie technology as part of Visa Concierge's statistical reporting and for other purposes related to making Visa Concierge available to you. A cookie is a small piece of information sent by a website that is saved on your hard disk by your computer's browser. It holds information a website may need to personalize your experience (such as, rotating images on the home page of the website).

We also utilize cookies to identify if you are logged into your Visa Concierge account, including for purposes of providing certain features of Visa Concierge to you. Cookies may be operable for

varying periods of time, depending on the Visa Concierge feature or features with which they are associated.

If you prefer, you can configure your browser to reject all cookies, or to notify you when a cookie is set. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie and privacy preferences. However, if you reject cookies, your use of Visa Concierge will be materially impaired or may altogether preclude your use of Visa Concierge.

A Web beacon is an electronic image, also called a single-pixel or clear GIF, placed in the code of a webpage or in emails. The Platform uses Web beacons to track traffic patterns of users as they navigate from one page to another. This information lets us tune and improve our users' browsing experience. The information that Web beacons collect is aggregated, anonymous "click stream" data, and is not associated with you as an individual.

We also use Web beacons through a third party website analytics provider, as well as standard Web server log files, to help us count visitors and evaluate the Platform's technical capacity. This information tells us how many people visit the Platform, and helps us decide how to arrange pages in the most user-friendly way. This also helps us keep the Platform browser/mobile-friendly and more useful to our users. We record information on Platform traffic, but not on individual visitors to the Platform, so no Personal Information about you will be kept or used.

### **LOCATION-BASED SERVICES**

The Platform may offer certain location-based services to you. You understand that these locationbased features require the location details of your mobile device to function properly and your use signifies your agreement to use your location for purposes of the service. If you do not want the Platform to use location-based information, please refrain from using a location based service or click "DON'T ALLOW" when your mobile device requests your location-based information. Except as set forth in this Privacy Policy, your location will not be shared with third parties without your specific consent.

#### YOUR PRIVACY RIGHTS AND CHOICES

You can direct us not to share your Personal Information with third parties and opt out of receiving emails by sending an email to <a href="mailto:concierge@visainfinite-asia.com">concierge@visainfinite-asia.com</a>, <a href="mailto:concier

You can cancel your enrolment by emailing us at concierge@visainfinite-asia.com, concierge@visasignature-asia.com or <a href="mailto:concierge@visaplatinum.com">concierge@visaplatinum.com</a>. If you choose to cancel your enrolment and your Account is no longer accessible, we still may retain and use your Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## HOW YOU CAN ACCESS AND EDIT YOUR PERSONAL INFORMATION

You can review or modify your Personal Information at any time by accessing the My Profile or Settings section on the mobile app. You can also submit a request to edit your Personal Information at any time by contacting us. Please refer to the "Contact Us" section below.

## **CHILDREN**

The Platform is not directed to children under 18. We do not knowingly collect, use or disclose Personal Information from anyone under 18 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the

parent/guardian's consent. If we become aware that we have unknowingly collected Personal Information from a child under the age of 18, we will make reasonable efforts to delete such information from our records.

## HOW WE PROTECT PERSONAL INFORMATION

Visa uses firewalls and Secure Socket Layers to help protect Personal Information when it is being communicated to us. Our policies restrict access to Personal Information to those employees and service providers who need to know the information to provide you this service. We maintain physical, electronic and procedural safeguards that comply with applicable privacy and data security laws and regulations.

### **OTHER SITES**

The Platform may contain links to other sites. We do not control, recommend or endorse and are not responsible for these sites or their content.

## **CONSENT TO TRANSFER OF DATA**

Please note that information collected by the Platform will be stored and processed in other countries, including the United States which may have different data protection laws than the country you reside in. By consenting to this Privacy Policy, you consent to our storage and processing of this information in the United States by installing and using the Platform.

In order to provide the Concierge services, we will be sharing your information with our Concierge service provider John Paul USA, a corporation organized under the Laws of the State of California, having its registered office located at 49 Stevenson, Suite 575, San Francisco, California 94105 (United States of America) ("John Paul USA."). John Paul USA will capture, store and manage your data as a third party supplier of Visa.

Further, John Paul USA may share your data with other 3<sup>rd</sup> party providers to enable or allow the provision of requested services to you. This includes and is not limited to merchants providing dining, travel, shopping and other services.

Legal Entity	Purpose of data sharing	Data	shared		
John Paul USA	Provision of service	All	data	provided	by
49 Stevenson, Suite 575, San		cardholder or captured as part			
Francisco, California 94105		of the service delivery			

### **CHANGES**

We may change this Privacy Policy at any time by posting an updated Privacy Policy to the Platform. Changes will be effective when you accept the updated Privacy Policy or, if consent for the changes is not required by applicable law, 30 days after the "Last Updated" date in the updated Privacy Policy, whichever comes first. In circumstances where consent is not required by applicable law for changes to this Privacy Policy, and if you don't affirmatively accept the updated Privacy Policy, your use of the Platform after the 30 day posting period means you are subject to the updated Privacy Policy. In such circumstances, if you do not agree to the updates, please do not continue using the Platform. We encourage you to periodically review this page for the latest information on our privacy practices. In circumstances where consent is required by applicable law for changes to this Privacy Policy, we will obtain your consent prior to such changes becoming effective.

# **CONTACT US**

If you have any questions or concerns about this Privacy Policy, the practices of Visa Concierge, or your experiences with the Platform, please contact us at concierge@visainfinite-asia.com, concierge@visasignature-asia.com or concierge@visaplatinum.com, or write to us/phone us at:

Address:

Visa Worldwide Pte Limited 71 Robinson Road #08-01 Singapore 068895 Attention: Legal Officer

Phone contact: +65

6671 5800

Contact person: Legal Officer

**UPDATED AS OF: 19 September 2018**