

Privacy Policy

Effective Date: September 1 2024

Solutions Travel LLC (“Solutions Travel,” “us,” “our,” or “we”) respect your privacy and are committed to protecting it consistent with this policy (“Privacy Policy”).

This Privacy Policy sets forth the types of information we may collect from or about you when you visit <https://solutionstravel.com> (the “Site”) or otherwise interact with us, for example, through online surveys, conference calls, webinars, and social media pages. This Privacy Policy provides transparency about our privacy practices, including how we collect, use, and disclose personal information (including, as applicable, “personal data”), as defined by applicable privacy and data protection laws, and how you may exercise your applicable privacy rights.

The privacy rights available to you may vary based on your individual circumstances and the laws applicable to you. By engaging with us through the Site or otherwise interacting with us, you consent to our use of your personal information as set forth in this Privacy Policy.

Scope of This Privacy Policy

This Privacy Policy applies to personal information we may collect as a data controller. It generally does not apply to traveler or reservation information that we may collect and process as a data processor in providing travel management services to customers, nor does it apply to third party websites or services which may be linked to from our Site. By using our services, your personal information may be shared with and processed by Spotnana. You can learn about how Spotnana uses personal information here: <https://www.spotnana.com/privacy-policy/>

This Privacy Policy is effective as of the “Effective Date” at the top of the page. We may revise this Privacy Policy from time-to-time (see “Changes to Privacy Policy” below). By continuing to use the Site or interact with us, you are consenting to any such revisions and should therefore regularly review this Privacy Policy to be apprised of any changes.

Use by Minors

The Site is not intended for minors. We do not knowingly collect personal information minors. If you are a minor, do not use this Site or provide us any information. If we learn that we have collected or received personal information from a minor without verification of parental consent, we will delete that information. If you believe we might have inadvertently collected information from or about a minor, please contact us at info@solutionstravel.com .

Personal Information We Collect

We may collect personal information directly from you through your interactions with us, including through any webform, survey, social media page, or other correspondence, including the *Contact Us* and *Request Demo* webforms. We may also collect information from you indirectly and from third parties about your device, web browser, and website interactions as you navigate the Site through the use of automatic data collection technologies, including Google Analytics. You can learn how Google uses personal information here: <https://policies.google.com/technologies/partner-sites>

The categories of personal information we may collect include identifiers, personal information described in Cal. Civ. Code § 1798.80(e), characteristics of protected classifications, commercial information, Internet and electronic network activity information, sensory information, professional or employment-information, education information, inferences drawn from other personal information, and certain sensitive personal information. Specifically, the personal information we collect includes:

Business Contact Data	First name, last name, company, title, phone number, e-mail, physical address, mailing address, country, and the content of any correspondences
Account Data	Account log-in and user information for account users and administrators, if you have engaged with us for services
Survey Data	Information you may provide in response to a survey, including your responses to survey questions
Social Media Data	Information and messages shared with us through our social media pages, including your associated profile information
Employment Application Data	Information concerning applications for employment, including work and education history, professional credentials and references, and background screening
Log Data	Information collected by our servers when you access our Site, including IP addresses, referral URLs, browser type and settings, date and time of usage, language preferences, and cookie data
Device Data	Information about your device, including type of device, operating system, application IDs, unique device identifiers, and crash data
Analytics Data	Approximate location based on your IP address (e.g., geolocation) and information your browsing session and duration, and your other interactions on the Site

We may use personal information collected from you for business and commercial purposes, including:

- Presenting the Site and its contents to you;
- Operating our business and administering customer accounts;
- Communicating through email and other means;
- Promoting our services through sales and marketing;
- Administering, designing, and improving the Site;
- Website analytics, e.g., tracking and measuring movements and interactions on the Site;
- Gaining sales and marketing insights;

- Recruiting and employment application processing, including background screening;
- Detecting and preventing abuse and security threats;
- Complying with legal and regulatory obligations;
- Providing you with information that you request from us;
- Fulfilling any other purpose for which you have provided us with your information;
- Notifying you about changes to the Site, our Terms of Use, or this Privacy Policy;
- In any other way we may describe when you provide the information; and
- For any other purpose to which you consent.

Use of Cookies, Pixels, Web Beacons, and Similar Technologies

Our Site uses cookies, pixels, web beacons, and other similar tracking technologies (collectively, “Cookies”), which may be associated with third parties. Cookies may include a small data file placed on the hard drive of your computer when you visit the Site. A Cookie file contains information that can identify you each time you visit the Site. The Site may use Cookies as a way to measure activity and traffic patterns on the Site in order to improve your experience, monitor usage and compile analytics, and for advertising and marketing purposes. Your browser can be set to warn you before accepting Cookies and you can choose to refuse Cookies by turning them off in your browser. You do not need to have Cookies turned on to visit the Site, but you may need them to use certain customizable features of the Site. By accessing and using our Site, you agree to our use of Cookies as described in this Privacy Policy.

Online Tracking and How We Respond to Do Not Track Signals

Under the California Online Privacy Protection Act (CalOPPA), we want to inform you about our “Do Not Track” (“DNT”) request policy. DNT is a feature that some web browsers offer to allow users to send signals to websites so that no information about their browser session will be shared. While we take all reasonable steps to protect your online privacy, we cannot promise that the current limitations of our online applications programming will address every browser setting or honor every personal browser preference. In particular, we have not implemented the necessary program changes to honor “Do Not Track” or “DNT” browser signals. As our online applications programming is refined, we will take all reasonable steps to honor such requests in the future. Please return to this Privacy Policy for further updates on this topic. You can learn more about DNT here: <https://www.eff.org/issues/do-not-track>

Personal Information We Disclose

We may disclose personal information to the following categories of recipients for our business and commercial purposes:

Technology Services Providers	We disclose personal information to our technology services providers as needed to operate the Site and our business, including software, analytics, and hosting services
Business Services Providers	We disclose personal information to our business services providers, including contractors, marketing services, auditors, information services providers, and accounting, tax, and legal professionals

Advertising Services and Networks	We may disclose personal information to advertising services and networks and social media platforms to deliver advertising and promote our services
Recruiters and Employment Services	We disclose applicant personal information to recruiters and employment application services as needed, including background screening services
Legal and Compliance	We disclose personal information as may be required by applicable law, regulation, or legal process, including government authorities
Corporate Transaction	We may disclose personal information as part of a transaction involving our business, e.g., in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our business assets

Aggregated and anonymized information that is incapable of identifying a natural person is not considered personal information and may be used and disclosed for purposes not discussed in this Privacy Policy.

Privacy Rights of California Residents

Under the California Consumer Privacy Act of 2018 (“CCPA”), California residents are afforded certain privacy rights. If you are a California resident, subject to certain limitations, you have the following rights concerning your personal information:

- Right to Know. You have the right to access the specific pieces of personal information collected about you, the sources from which such information was obtained, the categories of information that have been sold or disclosed for a business purpose, and the commercial purpose for which the information was collected or sold, provided to you in a reasonably portable format if you have a password-protected account.
- Right to Deletion. You have the right to request that we delete any of the personal information we have collected or maintain about you.
- Right to Rectification and Correction. You have the right to rectify and correct inaccuracies in your Personal Information.
- Right to Opt-out of the “Sale” and “Sharing” of Personal Information. You have a right to opt-out of the “sale” and “sharing” of your personal information, including for cross-context behavioral advertising, and to opt-in again at your election.
- Right to Limit Use and Disclosure of Sensitive Personal Information. You have a right to opt-out of secondary uses and disclosures of your Sensitive Personal Information.
- Right to Opt-out of Automated Decision-making. You have the right to opt-out to certain types of automated decision-making, subject to certain exceptions.
- Right to Non-Discrimination. You have a right to not be discriminated against in the event you exercise your other rights listed above. If you exercise these rights, Solutions Travel will not deny you goods or services, charge you a higher rate, or provide you with lower quality products.

Exercising Your Rights Under the CCPA:

You, or an authorized agent, may exercise your rights by submitting a request to info@solutionstravel.com . The CCPA allows for 1 disclosure request per 12-month period at no cost to you. For subsequent requests, we may charge a fee if we determine that the request is excessive, repetitive, or manifestly unfounded, but will not do so without providing you with a cost estimate before processing your request.

We respond to and process requests promptly and within the timeframes required by the CCPA. Please note that all requests are subject to proper prior verification before processing, as required by the CCPA.

If you are the authorized agent of an individual making a request, you may have to take additional steps to verify your identity and demonstrate that you can exercise the individual's rights on their behalf.

Sale of Personal Information:

With respect to the scope of this Privacy Policy, Solutions Travel does not "sell" or "share" personal information as such terms are defined by the CCPA and has not sold or shared personal information in the preceding 12-months. Because Solutions Travel does not sell or share personal information, Universal Opt-Out Mechanisms, including Global Privacy Control (GPC), do not apply to our Site.

Your Privacy Rights: California's Shine the Light Law

Solutions Travel has not disclosed in the preceding 12-months personal information to third parties for their own direct marketing purposes, as defined by Cal. Civ. Code § 1798.83.

Privacy Rights of Canadian Residents

Under Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and the Provincial Privacy Acts (together, the "Canadian Privacy Laws"), and their respective amendments and implementing regulations, Canadian residents are afforded certain privacy rights. If you are a Canadian resident, subject to certain limitations, you have the following rights concerning your personal information:

- Openness and Transparency. You have the right to know the personal information we collect about you and the purposes for its collection.
- Access. You have the right to access personal information we maintain about you, subject to certain exceptions.
- Correction. You have the right to correct inaccuracies in personal information we maintain about you.
- Right to Deletion. You have the right to request that we delete personal information we have collected or maintain about you.
- Right to De-indexing. You have the right to request your personal information be "de-indexed" from certain types of distribution.
- Right to Withdraw Consent. You have the right to withdraw consent to our use of your personal information, subject to certain exceptions.

Exercising Your Rights Under the Canadian Privacy Laws:

You, or an authorized agent, may exercise your rights by submitting a request to info@solutionstravel.com .

We respond to and process requests promptly and within the timeframes required by the Canadian Privacy Laws. Please note that all requests are subject to proper prior verification before processing.

If you are the authorized agent of an individual making a request, you may have to take additional steps to verify your identity and demonstrate that you can exercise the individual's rights on their behalf.

Transfer of Your Personal Information:

Your personal information may be transferred to third countries where an adequate level of data protection can be ensured. By sharing personal information with us, you consent to the transfer of your personal information to such third countries.

Privacy Rights of United Kingdom and European Union (collectively, "UK/EU") Data Subjects

Under the UK Data Protection Act 2018 and EU General Data Protection Regulation (collectively, the "GDPR"), UK/EU data subjects have the following rights concerning their personal information:

- Access and Rectification. You may have the right to access, correct, and update your personal information.
- Deletion/Erasure. You may have the "right to be forgotten" through the erasure or deletion of your personal information.
- Portability. You may have the right to move, copy, and/or transfer certain Personal Information from our service to another service.
- Stop Processing. If processing is on the basis of legitimate interests, you may have the right to object to the processing of your personal information and to ask us to restrict the processing of your personal information, subject to certain limitations.
- Withdraw Consent. If processing is on the basis of consent, you may have the right to withdraw consent to our processing at any time.
- Submit a Complaint. You have the right to submit a complaint to a data protection authority about our collection and use of your personal information. Contact details for the UK ICO and EU data protection authorities can be found here:

<https://ico.org.uk/global/contact-us/contact-us-public/>

https://www.edpb.europa.eu/about-edpb/about-edpb/members_en

Lawful basis of processing:

We may process the personal information of UK/EU data subjects on the following lawful bases:

- Legitimate Interests. Where the processing is necessary for the purposes of the legitimate interests pursued by Solutions Travel or a third party and not overridden by your rights and freedoms;
- Performance of a Contract. Where the processing is necessary for the performance of a contract with you;
- Consent. Where you have given consent to the processing of your personal information for one or more specific purposes; and
- Legal Obligation: Where processing is necessary for compliance with a legal obligation to which Solutions Travel is subject.

Exercising your rights under the GDPR:

You, or an authorized agent, may exercise your rights by submitting a request at info@solutionstravel.com .

We respond to and process requests promptly and within the timeframes required by the European Data Protection Laws, typically, this means within 30 days from receipt. Please note that all requests are subject to proper prior verification before processing.

If you are the authorized agent of an individual making a request, you may have to take additional steps to verify your identity and demonstrate that you can exercise the individual's rights on their behalf.

Transfer of UK/EU personal information:

Your personal information may be transferred to third countries, including to the United States. By sharing personal information with us, you consent to the transfer of your personal information to such third countries. Where applicable, we have adopted appropriate transfer mechanisms to safeguard the transfer of your personal information in accordance with applicable laws, including, the EU Standard Contractual Clauses.

Retention of UK/EU personal information:

Solutions Travel retains personal information for a period commensurate with the purposes for which the personal information was collected or obtained. The criteria used to determine the retention of personal information includes any time necessary for legal and compliance purposes. Personal information may be retained in archival format (e.g., data backups) beyond its retention period.

Data protection inquiries:

You may contact us regarding data protection matters at:

Solutions Travel LLC

135 Randhurst Village Drive

Mt. Prospect, IL 60056

Retention Period

We retain personal information for a period commensurate with the purposes of the processing.

International Transfer of Personal Information

Your personal information may be transferred to third countries with different or less privacy protections than your own country. By sharing Personal Information with us, you consent to the transfer of your personal information to such third countries.

Security of Personal Information

We have implemented appropriate measures for the protection of your Personal Information. If any of the personal information we retain about you is the subject of a breach of personal information under

applicable law, we will take such actions, including providing you with notification, as such law or laws may require.

Changes to Privacy Policy

If we decide to change this Privacy Policy or our practices, we will post a notice of those changes to our Privacy Policy on the Site home page in advance of the changes taking effect, so that you are always aware of our current policy and practices.

Contacting Solutions Travel

For exercising your applicable privacy rights or if you have any questions, concerns or complaints about the manner in which your Personal Information has been collected or handled by Solutions Travel, please contact us at info@solutionstravel.com .