



GLOBAL
BUSINESS TRAVEL

**Obriy Inc
Privacy Statement**

APPROVED

Effective Date: 13.02.2020

_____/Andrii Grytsai, General Director

Obriy Inc provides this privacy statement to describe how we may collect, use, share, and otherwise process your personal information, as an employee of one of our corporate clients or other individual to whom we offer or provide our services – travel, meetings and events, and related products and services -- via our websites, mobile applications, email communications or other online and offline means.

GBT travelers: If you are an employee or traveler of a corporate client of American Express Global Business Travel (GBT), we act as a data processor on behalf of GBT with respect to our collection and processing of your personal information. The remainder of this Privacy Statement does not apply to you; your information is governed by the GBT Privacy Statement <http://privacy.amexgbt.com/> For questions about your personal information, you may contact GBT as directed in its Privacy Statement or contact us here: hq@obriy.ua

Summary of key points

What information we collect	We collect information about you in connection with your registration, use, purchase, or inquiries about our services.
How we use your information	We use your information to provide our services, process payments, operate our websites and mobile applications, market products and services, create business insights and comply with law.
How we share your information	We may have a contract with your employer or travel sponsor, who is our corporate client, and we share your information with them, as well as with our affiliates, travel suppliers and vendors to book travel arrangements and provide our services. We do not sell or share information with third parties so that they can independently market their own products or services directly to you.
How we protect and store your information	We maintain reasonable administrative, technical, and physical security measures to protect your personal information from unauthorized access and use.
Marketing and your choices	We use your information for marketing, and respect your choices about how we communicate marketing to you.
International	We transfer your information outside of your home country as permitted by law. To

JSC Obriy Inc., 7, Kudryashova str., Kyiv, 03035, Ukraine

Obriy Inc. is an independently owned and operated entity which is a licensee of American Express Global Business Travel ("GBT"). GBT is a joint venture that is not wholly-owned by American Express Company or any of its subsidiaries ("American Express"). "American Express Global Business Travel", "American Express" and the American Express logo are trademarks of American Express, and are used under limited license.

transfers	protect your information, international transfers will be made under appropriate data transfer agreements and other protections.
Your rights	You have the right to be informed of whether we are processing your information and to access, correct, delete or object, upon request and free of charge, to our use of your information, to the extent required by applicable law.
Changes	We will tell you about material changes to this privacy statement by posting it on our website before it goes into effect and, where appropriate, communicating directly to you about the change.
Questions	If you have questions about this Privacy Statement, please contact us at hq@obriy.ua

What information we collect

Account Information – If you contact us, register with us or receive services from us, we collect information about you. This may include your name, email address, phone numbers, employer, and physical addresses. We may also require passport number, visa numbers, gender and date of birth for travelers. If we book travel for your travel companions, we may collect similar information about them. Account information goes into your traveler profile, which is where we store the information necessary to book your travel and provide you with our services. You may choose to provide more information in your traveler profile, including frequent traveler credentials, government identifiers and emergency contact information.

Travel Information – If you book travel with us, we collect the details of your travel (such as arrival and departure location, airline, hotel and car rental) and any other information needed to complete your bookings. We may also collect special categories of information to provide accessibility, meal preferences or other requested services.

Payment Information – To pay for bookings and other transactions through our services, we collect payment card information and other details necessary to process payments.

Device Data – We collect information about how you access our services, including your computer's IP address and information that can be derived from it (such as internet provider and general geographic location), your device's unique identifier and other technical information. We also collect information about how you use our websites and mobile applications. We collect some of this information using cookies and similar technologies, as described [here](#).

How we use your information

Provide you with travel products and services – We use your information to book your travel, organize meetings and events, prepare itineraries and invoices, communicate with you about your travel or our products and services, provide customer service, and manage your account.

Provide our products and services to corporate clients – We use your information to comply with our agreements with your employer or travel sponsor, communicate about our products and services, and help them ensure compliance with their policies.

Process payments – We use your information to process transactions and provide you with related customer service.

Operate websites and mobile applications – We use device data to monitor and improve the performance and content of our services, provide updates, analyze trends and usage in connection with our services.

Operate and improve our business – We use your information for compliance with our company policies and procedures, for accounting and financial purposes, to detect or prevent fraud or criminal activity, to perform, analyze and improve our business and services, and otherwise as required by law.

Marketing and your choices

We may use personal information to tell you or your company/sponsor about our products and services or those from related businesses, to help us determine whether you may be interested in new products or services.

We may send you marketing on our websites or mobile applications, and through email and other channels, in accordance with applicable law and your choices. You have choices about how we market to you. If you'd like us to stop sending you marketing messages, you can follow the instructions in our communications or update your traveler profile at any time.

We also may send you or your company designated travel arrangers messages that are essential for our services; for example, we communicate with you about your travel, to service your account, to fulfill your requests, or otherwise as required by law. Some of these service messages contain information presented to you as part of our service relationship with your employer or travel sponsor. If you opt out of marketing messages, you will continue to receive these service messages.

How we share your information

Your employer or travel sponsor – Our services to you may be provided under the terms of service agreements with your employer or travel sponsor. We share your information with them to allow them to manage their business travel needs and assure compliance with their company travel policies. At the request of your employer or travel sponsor, we may also share information with their vendors.

Affiliates – We may share information within our corporate family to the extent permitted by law to allow them to provide, analyze and improve their and our products and services.

Travel suppliers and other travel service providers – We share information with travel suppliers (for example, airlines and hotels) and travel service providers (for example, ticket distribution systems and travel application providers), and the vendors for both, as necessary to book your travel and provide travel-related services to you and your employer. We do not sell information to third parties so that they can independently market their own products or services directly to you.

Vendors – We share information with vendors that perform functions on our behalf, such as other travel agencies, meeting and event planners, visa and passport service providers, mobile application and software developers, and vendors who provide IT support, data hosting, marketing and communications services, and collections. These vendors access information only as necessary to perform their functions, as instructed in our contracts with them.

Business insights – We may combine data from many people to create aggregated statistics that do not identify you personally. We use this data to understand business trends and insights, and we may share them with third parties.

Business transfers – If we negotiate or complete a transaction involving all or part of the business (for example, a reorganization, merger, sale or acquisition), we may disclose information to third parties involved in the transaction to the extent permitted by law.

As required or permitted by law – We may disclose information to regulatory authorities, courts, and government agencies where we believe doing so would be permitted or required by law, regulation or legal process, or to defend the interests, rights or property of Obriy Inc or others.

We may also share personal information with other parties as directed by you or subject to your consent.

How we protect and store your information

We maintain reasonable administrative, technical, and physical security measures to protect your information from unauthorized access and use. We retain your information only as long as needed to provide our Services and for legitimate business purposes, unless we are required by law or regulation or for litigation and regulatory investigations to keep it for longer periods of time.

Your rights

If you have created an online account with us and would like to update the information you have provided to us, you can access your account to view and make changes or corrections to your information if you are an online booking tool user or contact your Travel Consultant at Obriy Inc to retrieve and change your profile accordingly (if you have doubt who your travel consultant is – please contact hq@obriy.ua). You may also have the right to be informed of whether we are processing your information and to access, correct, delete or object, upon request and free of charge, to our use of your information. To exercise these rights, please contact us at: hq@obriy.ua. We will try to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping, to complete any transactions you began before your request, or for other purposes as permitted by law.

Changes

We may change this Privacy Statement from time to time as our business changes or legal requirements change. If we make material changes to this Privacy Statement, we will post a notice on our website before the changes go into effect, and notify you as otherwise required by applicable law.

Questions

If you have questions or complaints about Obriy Inc and privacy, please contact us at:

Obriy Inc Head office:

01001 49A Volodymyrska Str., Kyiv, Ukraine

+38044 4906522

hq@obriy.ua

In most cases, we will ask that you put a complaint in writing. We will investigate your complaint and will generally respond to you in writing within 30 days of receipt. If we fail to respond or if you are otherwise dissatisfied with the response that you receive from us, you may have the right to make a complaint to your regulator.

Cookies and similar technologies

We use session and permanent “cookies,” small data files transferred to your device, along with similar technologies (e.g., internet tag technologies, web beacons and embedded scripts) (collectively referred to herein as "cookies and similar technologies") to help provide you a better, more personalized user experience (technical cookies). These technologies are used to make the user experience more efficient, remember your preferences (such as browsing language and account login information) (profile cookies), and help us understand and improve how visitors use our websites, including which of our pages and products are viewed most frequently (analytical cookies).

The Options/Settings section of most internet browsers and devices will tell you how to manage the cookies and other technologies that may be transferred to your device, including how to disable such technologies. You can disable our cookies or all cookies through your browser or device settings, but please note that disabling cookies may impact some of the website’s features. Other than as described above, we generally do not comply with "do track signals" sent by web browsers.

For further information about the options of the main internet browsers, please see their websites at:

Internet Explorer: windows.microsoft.com/en-us/internet-explorer/delete-manage-cookies#ie=ie-10

FireFox: support.mozilla.org/en-US/kb/delete-cookies-remove-info-websites-stored

Chrome: support.google.com/chrome/answer/95647?hl=en

Safari: www.apple.com/legal/privacy/en-ww/cookies/