

ANIYAMI BRAZIL PRIVACY STATEMENT

Aniyami Turismo Ltda (under the brands Aniyami Brazil & Brazil Planners) provides this privacy statement to describe how we may collect, use, share and otherwise process personal information, as an employee of one of our clients or other individuals to whom we offer our services – travel and related products and services in Brazil – via our websites, mobile applications, communications channels or other online and offline means.

Aniyami Turismo Ltda

Rua C, Quadra E, Lote 20, S/N Serra Grande

Uruçuca – BA 45680-000

Brazil

To contact the Data Protection Officer, please contact marketing@aniyami.com.

SUMMARY OF KEY POINTS

What information we collect	We collect personal information about you in connection with your registration, use, purchase or inquiries about our services. We also collect personal information about your clients travelling to Brazil with us in connection with your booking of our services.
How we use your information	We use your personal information to provide our services, process payments, operate our websites and applications, market products and services, create business insights and comply with law. We use your clients' personal information only to provide our services in Brazil, process payments (if requested), and comply with law.
How we share your information	We have an agreement with your employer, who is our client, and we share personal information with them, as well as with our travel suppliers and vendors to book travel arrangements and provide our services in Brazil. We do not sell or share personal information with third parties so that they can independently market their own products or services directly to you or your clients.





Marketing and your choices	We use your personal information for us to market to you, and respect your choices about how we communicate marketing to you. We do not use your clients' personal information to market to them, and we use it only for the operation of the services you booked with us..
International transfers	We transfer personal information within Brazil as permitted by law. Regardless of where personal data is transferred, personal data is protected in accordance with our Data Protection Principles.
Your rights	You have the right to be informed of whether we are processing personal information and to access, correct, delete or object, upon request and free of charge, to our use of personal information, to the extent required by 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.
Contact us	If you have questions about this privacy statement, please contact us at marketing@aniyami.com or at: Marketing Team Aniyami Turismo Ltda Rua C, Quadra E, Lote 20, S/N Serra Grande Uruçuca – BA 45680-000 Brazil

WHAT PERSONAL INFORMATION WE COLLECT

Account Information

If you contact us, register with us or receive services from us, we collect personal information about you. You may give us the information, or your employer may send it to us. This may include your name, email address, phone numbers, employer name, and physical addresses. Account information goes into your client profile, which is where we store the information necessary to provide you with our services.





Travel Information

If you book travel in Brazil with us for your clients, we collect their personal details such as name, phone numbers, passport number, gender, nationality, date of birth, health & safety information (includes insurance, allergy and emergency contacts), arrival and departure location, airline, and any other information needed to complete your bookings.

Payment Information

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

Precise Location

In addition to the broad location information we receive through travel itineraries or IP address, we may collect precise personal location under some circumstances. We may receive it through our mobile applications, with your consent.

HOW WE USE PERSONAL INFORMATION

Provide you with our products and services

We use personal information to book travel, organize meetings and events, prepare itineraries and invoices, communicate with you about our products and services in Brazil, provide customer service, manage your account, and provide you and your employer with emergency services.

Provide our products and services to clients

We use personal information to provide our travel, meetings and events, and other related travel services to your employer, to comply with our agreements with them, to communicate about our products and services, and to help them ensure compliance with their policies.

Process payments

We use personal information to process transactions and provide you with related customer service.





Operate websites and mobile applications

We use device personal data to monitor and improve the performance and content of our services, provide updates, analyze trends and usage in connection with our services, and measure whether our ads and offers are effective.

Operate and improve our business

We use personal 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 about our products and services or those from related businesses (such as restaurants, consumer products, tours and entertainment), to help us determine whether you may be interested in new products or services, and to present advertising content that is tailored to your interests, location or itinerary (with your consent or as permitted by law). If you'd like us to stop sending you marketing messages, you can also follow the instructions in our communications to you.

We also send you messages that are essential for our services; for example, we communicate with you to service your account, to fulfil 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 (for example, messages that help you comply with their travel policies).

HOW WE SHARE PERSONAL INFORMATION

Your employer

Our services to you are provided under the terms of our service agreements with your employer. We share personal information with them to allow them to manage their business travel needs, meet their duty of care to their employees, and assure compliance with their policies. At the request of your employer, we may also share personal information with its vendors.





Travel suppliers and other travel service providers

We share personal information with travel suppliers (for example, hotels and guides) and travel service providers (for example, ticket distribution systems), and the vendors for both, as necessary to book travel in Brazil and provide travel-related services in Brazil 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 or your clients.

Vendors

We share personal information with vendors that perform functions on our behalf, such as our network of local travel agencies in Brazil, meeting and event planners, transport companies, visa and passport service providers, and other travel related services. We share personal information with 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 combine personal 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.

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 Aniyami 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 PERSONAL INFORMATION

We maintain reasonable administrative, technical, and physical security measures to protect personal information from unauthorized access and use. We retain personal 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.

INTERNATIONAL TRANSFERS

We transfer personal information to the Brazil jurisdiction as necessary for the purposes described here, following the recently approved Lei Geral de Proteção de Dados (Law 13.709 from August 2018). This Brazilian law follows the European GDPR Law. Regardless of where we process personal information, we protect it in the manner described in this privacy statement and in accordance with applicable law and our Data Protection Principles.

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 contact us and make changes or corrections to your information. You may also have the right to be informed of whether we are processing personal information and to access, transfer, correct, delete or object, upon request and free of charge, to our use of your information. 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 where appropriate, send a direct communication to you about the change.





CONTACT US

If you have questions or complaints about Aniyami and privacy, or to exercise your rights, please contact the data protection office at:

Marketing Team

Aniyami Turismo Ltda

Rua C, Quadra E, Lote 20, S/N

Serra Grande

Uruçuca – BA 45680-000

Brazil

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.





ANIYAMI DATA PROTECTION AND PRIVACY PRINCIPLES

The following Data Protection and Privacy Principles (“Principles”) set out the way that Aniyami Turismo Ltda (under the brands Aniyami Brazil and Brazil Planners) will collect, use, store, share, transmit, delete or otherwise process (collectively “process”) personal data. Personal data means any information that relates to an identified or identifiable individual. In these Principles, “you” and “your” means any individual customer and any other individual whose personal data we process and “we”, “us”, “our” and “Aniyami” means Aniyami Turismo Ltda.

1. Collection

We will only collect personal data that is needed and by lawful and fair means.

2. Notice and Processing

Where it is not apparent from the products or services you require or the nature of your relationship with us, we will tell you how personal data will be processed. We will process personal data fairly and only for those purposes we have told you, for purposes permitted by you or as permitted by applicable law. In addition, you may object to certain types of processing as expressly permitted by applicable law.

3. Choice

We give customers the option of having personal data included or removed from lists used for marketing as required by applicable law. This includes product and service offers from Aniyami and those made in conjunction with our business partners. Of course each of our businesses will continue to send customers information about the products or services they receive from that business.





4. Data Quality

We use appropriate technology and well-defined employee practices to process personal data promptly and accurately. We will not keep personal data longer than is necessary, except as otherwise required by applicable law.

5. Security and Confidentiality

We will keep personal data confidential and limit access to personal data to those who specifically need it to conduct their business activities, except as otherwise permitted by applicable law. We refer to industry standards and use reasonable administrative, technical and physical security measures to protect personal data from unauthorised access, destruction, use, modification or disclosure. We require industry standard data security measures from those third parties who are authorised by us to process personal data on our behalf.

6. Data Sharing

We only share personal data with third parties where it is necessary to provide you with products or services or as part of the nature of our relationship with you, where we have previously informed or been authorised by you, in connection with our efforts to reduce fraud or criminal activity, or as permitted by law.

7. Openness and Data Access

If you ask, we will inform you about how personal data is processed and the rights and remedies you have under these Principles. You may inquire as to the nature of the personal data stored or processed about you by Aniyami. You will be provided access as is required by law in your country, regardless of the location of the data processing and storage. If any data is inaccurate or incomplete, you may request that the data be amended.





8. International Transfer

Personal data will be transferred outside of your country in Brazil. We ensure that such transfer is only performed in accordance with applicable law. Regardless of where personal data is transferred, personal data is protected by these Principles.

9. Responsibility

Aniyami and their employees may only process personal data in accordance with these Principles. We conduct training and reviews of our compliance with these Principles. Employees who violate these Principles may be subject to disciplinary action, up to and including dismissal. Employees are expected to report violation of these Principles, and may do so to their managers, to the Privacy Office or to the company's owners.

10. Accountability

You may enforce these Principles in your country against Aniyami that is responsible for personal data, as a third party contractual beneficiary to these Principles. If you have a complaint that we have breached these Principles and have attempted in good faith to resolve the complaint through our customer service process, but the complaint was not resolved by us within a reasonable amount of time, then you may enforce these Principles against us. If you complain to your local data protection authority and the data protection authority finds that we have breached these Principles, we will abide by the findings of the data protection authority, but we reserve the right to challenge or appeal such findings.

These Principles do not affect any rights you have under applicable law, the requirements of any applicable regulatory data protection authority, or any other type of agreement that you may have with us.

These Principles emphasize our commitment to protect personal data and privacy. If you have questions or comments about these Principles, please contact us at marketing@aniyami.com.

