

PRIVACY POLICY

1. This Privacy Policy sets out how [Paveway Explorer] (hereinafter referred to as “the Company”, “we”, “us” or “our”), may collect, use, disclose, transfer, store or otherwise process your Personal Information (as defined below). We are committed to protecting your privacy.
2. This Privacy Policy applies to Personal Information in our possession or under our control, including Personal Information in the possession of organisations which we have engaged to collect, use, disclose or process Personal information for our purposes.
3. The Company may share your Personal Information and use it in a manner and for purposes which are consistent with this Privacy Policy and consistent with the Personal Data Protection Act 2012 of Singapore. We may combine your Personal Information with other information for the purposes of providing products and services to you, or to improve our products, services, content and advertising.

PERSONAL INFORMATION

4. As used in this Privacy Policy:
 - a. “Customer” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us;
 - b. “Personal Data” means information or data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access; and
 - c. “Personal Information” means Personal Data together with information on your travel preferences, loyalty, frequent flyer and/or car rental programmes which you participate in, and feedback, testimonials, photographs and videos of the trip which you booked with us.
5. Depending on the nature of your interaction with the Company, some examples of personal data which we may collect from you include your name and identification number, such as your NRIC number, contact information such as your address, email address or telephone number, nationality, gender, date of birth, marital status, photographs and other audio-visual information, contact preferences, employment information and financial information such as credit card numbers, debit card numbers or bank account information.
6. Other terms used in this Privacy Policy shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION OF PERSONAL INFORMATION

7. We generally do not collect your Personal Information unless:
 - a. It is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your Personal Information to us (your “authorised

- representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes; or
- b. Collection and use of Personal Information without consent is permitted or required by the PDPA or other laws.
8. We shall seek your consent before collecting any additional Personal Information and before using your Personal Information for a purpose which has not been notified to you (except where permitted or authorised by law).
 9. We may collect, use, disclose, transfer and store any Personal Information you enter on our website or give us through various means, including telephone calls, emails, enquiries or bookings at our sales office, SMS, fax, post, and any platforms used by the Company from time to time (collectively the “Platforms”). You are not required to provide the Personal Information that we have requested, and if you choose not to provide the requested Personal Information, we may be prevented from providing certain products or services to you.
 10. When you make a reservation with us on behalf of a travel companion or another person, we will request for the Personal Information of that individual. You should obtain the consent of such other individuals prior to providing their Personal Information to us. Any request to view or change their Personal Information provided in relation to the reservation which you have made can only be made through you or your account with us.
 11. We may request Personal Information relating to you through surveys or contests which we conduct from time to time. Participation in these surveys or contests is completely voluntary and you have a choice as to whether or not to provide the Personal Information we have requested through the survey or contest. Personal Information collected through surveys will be used for the purposes of monitoring or improving the use and satisfaction of our services. Personal Information collected through contests will be used to notify winners and award prizes.
 12. Your telephone calls with us may be recorded or monitored for the purposes of quality control and staff training. The call recordings will be retained by us for as long as reasonably necessary and will then be deleted. Any Personal Information obtained from you during the call will be treated in accordance with the provisions of this Privacy Policy.

HOW WE USE YOUR INFORMATION

13. We may collect and use your Personal Information for any or all of the following purposes:
 - a. Performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - b. Verifying your identity;

- c. Communicating with you in general and responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
- d. Managing your relationship with us which includes, but is not limited to, (i) measuring interest in and improve our products, services and website, (ii) providing you with travel confirmation and updates, (iii) customising your experience on our website, and (iv) rewarding you as part of any reward and recognition programme you choose to join;
- e. Manage your account, including processing bills, payment or credit transactions, and providing travel notifications;
- f. Sending you market information about our goods and services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions;
- g. Resolve disputes, collect fees, or troubleshoot problems;
- h. Complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- i. Prevent potentially prohibited or illegal activities;
- j. Any other purposes for which you have provided the information;
- k. Transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- l. And other incidental business purposes related to or in connection with the above.

14. We use your credit card information for the purpose of completing the travel bookings which you make with us.

15. We want to make it easy for you to take advantage of travel-related opportunities with us. One way we do this is by sending marketing messages to you through email, SMS, fax or post that contain information about your travel-related interests and travel-related special offers which are available to us. Please note that you can withdraw your consent for us to send marketing messages to you. Please refer to the opt-in and opt-out policy section of this Privacy Policy which sets out how you may set your preferences in relation to such marketing messages.

DISCLOSURE OF PERSONAL INFORMATION

16. We may disclose your Personal Information:

- a. Where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you; or
- b. To third party service providers, agents and other organisations we have engaged, some of whom may be located overseas and as a result may require us to transfer your Personal Information overseas, to perform any of the functions listed in clauses 13, 14 and 15 above for us.

17. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT

18. The consent that you provide for the collection, use and disclosure of your Personal Information will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or by emailing us at [privacy@pavewayexplorer.com].

19. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

20. While we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 18 above.

21. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose Personal Information where such collection, use and disclosure without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

22. If you wish to make (a) an access request for access to a copy of the Personal Information which we hold about you or information about the ways in which we use or disclose your Personal Information, or (b) a correction request to correct or update any of your Personal Information which we hold about you, you may submit your request in writing or email us at [privacy@pavewayexplorer.com].

23. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

24. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any Personal Information or to make a correction request

by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

25. We generally rely on Personal Information provided by you (or your authorised representative). In order to ensure that your Personal Information is current, complete and accurate, please update us if there are changes to your Personal Information by emailing us at [privacy@pavewayexplorer.com].

CHANGE IN PRIVACY LAWS AND REGULATIONS

26. We reserve the right to amend this Privacy Policy at any time. We will notify you of any changes to this Privacy Policy by sending a notice to the email address you have provided to us or by placing a prominent notice on our website. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.