

Privacy Policy and Data Protection

Viajes Premium, in accordance with Peruvian Law N°29733 – Law on Personal Data Protection – and Code N° 003-2013-JUS; protects and processes the personal data of customers, passengers, providers, tour operators and travel agencies, collected through the different physical or digital channels, for all purposes expressly communicated and agrees to ensure and adopt the measures for information security through the best international practices, regarding confidentiality, completeness and availability of personal data provided.

DEFINITIONS

- **Controller:** the natural or legal person, which alone or jointly with others, determines the purposes and means of the processing of personal data, namely, Viajes Premium shall be responsible for the personal data obtained by its different collection channels and provided by its customers and member companies.
- **Personal Data:** any information relating to an identified or identifiable natural person (the data subject), such as the name, identification number (DNI), passport, location data or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- **Processing:** any operation or set of operations conducted on personal data or sets of personal data (whether or not by automated means), such as collection, recording, organization, modification, consultation, use, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of personal data.
- **Right of access:** the right of the data subjects to know which information is being processed by Viajes Premium and to obtain a copy of it.
- **Right to rectification:** the right of the data subjects to have their personal data updated, rectified and/or corrected.
- **Right to object:** the right of the data subjects to object at any time to the processing of their personal data by Viajes Premium.
- **Right to erasure ("right to be forgotten"):** the right of the data subjects to have their data erased from any document, file or place.
- **Right to restriction of processing:** the right of the data subjects to have their personal data restricted to several circumstances provided by law, such as the illicit processing of personal data or when it is no longer required by Viajes Premium.
- **Right to data portability:** the right of the data subjects to receive the personal data concerning them that have been provided to Viajes Premium, in a structured, commonly used and machine-readable format, and the right to transmit those data to another controller without hindrance from the controller.

▪ **Right to not being the subject to individualized decisions:** the right of the data subjects to not being the subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affect them.

CONSENT

Viajes Premium processes personal data of the data subjects:

1. When they expressly have given consent to the processing of their personal data for the purposes set forth in this document and/or,
2. When processing is necessary for the performance of a contract for the provision of services and products, to which the data subject is party.

PERSONAL INFORMATION AND SCOPE

This policy covers the personal data concerning the clients, provided by them freely, voluntarily and consciously. The data collected and stored are comprised of basic data entered through registration and contact forms and other similar means, such as the name, identification number, passport, gender, age, telephone number, email address, country of residence, among other details collected through the different company managed channels, which are necessary for Viajes Premium to provide the tourism related services. In any case, the data subjects may see which personal data are required for the provision of service and which are complementary before providing their personal data.

The data subjects shall be solely responsible for providing correct and accurate data.

They must be above 18 years old and fully competent to contract. In addition, the data subjects shall assume sole responsibility for the information provided of third parties, and for ensuring that they have been informed of this Policy of Confidentiality, and for having obtained their express authorization.

GUIDING PRINCIPLES

Viajes Premium shall consider the principles shown below for the processing of personal data.

Principle of Legality: In accordance with Law 29733, the processing of personal data is a regulated activity that must be subject to said law and all other pertinent regulating provisions. Collecting personal information through fraudulent, disloyal or illegal means is forbidden.

Principle of Consent: In accordance with the principle of consent, the processing of personal data is legitimate when the data subject has given his/her prior, voluntary, express, informed and clear consent. Consent statements that are not directly expressed, like those requiring the assumption or assuming the existence of an intention that has not been expressed, are not accepted. Even the consent given with other statements shall be expressly and clearly expressed.

Principle of Purpose: The principle of purpose considers that a purpose is determined when it has been clearly expressed, without confusion and when the purpose of processing personal data is objectively specified. As a personal data bank that contains sensitive data, its creation may only be justified if its purpose, in addition of being legitimate, is specific and consistent with the activities or purposes of the manager of the personal data bank. The professionals processing personal data, in addition of being restricted for the purpose of their services, have the obligation to keep confidentiality.

Principle of Quality: The personal data must be true, exact and, if possible, updated, necessary, pertinent and proper for its purpose. It must be preserved in such a way that it remains secure and only for the time required for the purpose of processing.

Principle of Proportionality: Any processing of personal data must be suitable, relevant and must not go beyond the purpose for which it was collected.

Principle of Security: The manager of the personal data bank and the processor must adopt the technical, organizational and legal measures required to ensure the security of the personal data. The security measures must be suitable and consistent with the processing to be conducted and the category of personal data.

Principle of Availability of Means: Any data subject must have the administrative or jurisdictional means required to file claims and enforce their rights when they are affected for the processing of their personal data.

Principle of Proper Protection Level: For the border flow of personal data, a sufficient level to protect the personal data to be processed must be ensured, or at least, similar to what is set forth by law or the concerning international standards.

PURPOSES OF PERSONAL DATA

Viajes Premium will use the personal data provided by the data subjects for the purposes shown below:

- To provide the tourism-related contracted services and products.
- To contact the client during the provision of the contracted services and products.
- To coordinate with suppliers, travel agencies, cruises and hotels.
- To send information to the clients about the service and/or provisions to be met by the clients during the service, for example, the contracting terms and conditions, tax requirements and/or other conditions that may include the company's internal policies.
- To answer doubts, questions and requests.
- To provide proof of the payments of the non-domiciled IVA before Tax Authorities, through the Information of Passport and Andean Immigration Card (TAM), among others.
- To analyze and identify the expectations and preferences of travel agencies to buy tickets and services.

RIGHTS OF THE DATA SUBJECTS

The data subjects will have the rights shown below:

1. Only the data subjects may have the rights of information and access, rights to rectification, erasure, object and objective processing of personal data, without detriment to the rules governing representation.
2. Exercising any of the rights does not exclude from the possibility of exercising any other rights, nor can it be understood as a prior requirement for exercising any of those.
3. To know, update and rectify their personal data before Viajes Premium or the appointed processor. This right may be applied in case of incomplete, inaccurate, incomplete, partial, confusing data or data which processing has been forbidden or not authorized.
4. To be informed by Viajes Premium or the appointed processor, upon request, of how their personal data have been used.

5. To revoke the authorization and/or request erasure of data when the constitutional and legal principles, rights and guarantees are not fulfilled in the processing.
6. Revoking or erasing the information will proceed when the National Authority of Personal Data Protection has determined that Viajes Premium or the processor had contravened Law 29733 and the Constitution when processing the data.
7. To have free access to your personal data subject to processing, in the terms and conditions set forth herein.

CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

Authorization from the data subject: In order for Viajes Premium to process any personal data, prior authorization from the data subject is required, which shall be obtained through any means that may be subject to further consultation. These mechanisms may be predetermined through technical means that enable the automated manifestation of the data subject, or they can be written or oral.

Viajes Premium will adopt the procedures required to request, no later than the moment of collecting the data, the authorization from the data subject for processing the data, and tell which personal details will be collected, as well as all specific purposes of the processing.

Provision of information: The information requested by the data subject shall be provided by Viajes Premium in the same way as it was requested.

Obligation to inform the data subject: At the moment of requesting the authorization from the data subject, Viajes Premium shall clearly and expressly inform the data subject of the following:

- The processing to which his/her personal data will be subject and its purpose.
- The optional responses to the questions posed when they are about sensitive data or about data of children and adolescents.
- The rights of the data subject.
- The identification, physical or electronic address and telephone of the controller.

Revocation of the authorization and/or erasure of data: The data subjects may at any time request Viajes Premium to erase their personal data and/or revoke the authorization given for processing the data. It must be done by submitting a request, in accordance with Law 29733 of 2011 and its regulations - Executive Decree No. 003-2013-JUS of 2013.

People to whom the information may be provided: The personal data that have been processed by Viajes Premium may be provided to the following people:

- Data subjects, their successors or legal representatives.
- Public or administrative entities exercising their legal functions or by judicial order.
- Third parties authorized by the data subject or by law.

SECURITY OF THE PERSONAL DATA

Viajes Premium complies with the measures of personal data protection required by law and has adopted the reasonable measures according to the current technical knowledge and good practices for the custody and management of information in order to prevent the loss, misuse, alteration, illegal intrusion and theft of personal data provided by the data subjects.

PROCEDURES

The data subjects or their successors have the right to make consultations and/or file claims before Viajes Premium through a written communication – in which they must enter their identification details – sent to the address shown below at any time. Also, they have the right to remove their consent for processing personal data and/or use their rights of access and information, and rights to rectification, object, erasure, restriction, to be forgotten, portability and to not being subject of individualized decisions, through a written communication addressed to Viajes Premium, with the reference “PERSONAL DATA”, to the following email address: info@viajespremiumlatinamerica.com or to the physical/legal address: Jr. Isaac Albeniz 398 Dpto. 302 San Borja, Lima, Peru.

Viajes Premium will give response to the consultation and/or claim through the same method of communication.

SECURITY MEASURES

Viajes Premium takes all reasonable precautions and measures of technical, administrative and organizational nature towards ensuring the security of the personal data of data subjects, especially those aimed at preventing them from being corrupted or from loss and non-authorized access or processing.

The application of security measures is intended to ensure that the data remain confidential, complete, available and well-stored.

The security guidelines of Viajes Premium are supported by the information security policies of Viajes Premium, developed under the best existing security practices and standards and complying with the regulations in force.

The direct and indirect officers who carry out duties at Viajes Premium must strictly comply with the policies.

PRESERVATION OF THE DATA

The periods for Viajes Premium to keep the personal data of the data subjects shall be different depending on the purpose of the processing. For instance, the data shall be preserved for the time a contractual relationship is effective for the provision of products and services between Viajes Premium and the data subjects and/or while the data subjects do not request Viajes Premium to erase their personal data. In addition, the data subjects understand and accept that some personal information shall be kept by Viajes Premium, in accordance with legal regulations and for the time provided by law.

MODIFICATIONS TO THE POLICY

Viajes Premium may make changes and update this policy depending on the news or legislative or jurisprudence requirements and/or needs of the institution, among others.

In fact, data subjects are recommended to check this policy in a regular basis and/or each time when they access the company's website.