

## WorldMobile Privacy Policy

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*Effective Date: July 27, 2017*

**It is very important that you review this policy and understand it before using WorldMobile. To be clear, World Travel, Inc., through WorldMobile, shares personal data with third parties.**

### **Introduction**

WorldMobile is a mobile application (an “app”) travelers (“Users,” or “you”) can download from their favorite App Store onto their mobile phone. WorldMobile’s primary function is itinerary and traveler information management for World Travel, Inc.’s customers’ travelers. You cannot make travel reservations using WorldMobile. More about WorldMobile’s functions are set forth below.

This policy is effective on October 26, 2016. As with all of World Travel, Inc.’s policies, it may change this policy at its sole discretion. Users will receive in-app notification of any update to this policy. An up-to-date ***WorldMobile Privacy Policy*** will also always be available to Users in the App Store or on World Travel, Inc.’s corporate website.

You may request a copy of this policy, or the ***WorldMobile Terms and Conditions***, at any time by sending an email to [privacy@worldtravelinc.com](mailto:privacy@worldtravelinc.com).

### **Not Everyone Can Use WorldMobile**

In order to use WorldMobile, you must be a traveler for a company that has a valid contract with World Travel, Inc. for corporate travel reservation and management services.

Additionally, you must have a valid “Travel Profile.” You can find out more about a Travel Profile in the section, “What is a Travel Profile?” below.

Finally, WorldMobile is not available for use by individuals who hold passports issued by any country other than the United States.

### **WorldMobile is intended for Authorized Business Travelers who Use the App**

Starting December 1, 2016, World Travel, Inc. will monitor its databases to identify records for Users who have not used WorldMobile for ninety (90) days. If it discovers records for Users who have not

used WorldMobile for at least ninety days, it will immediately deactivate the User. That means that if the traveler wants to use WorldMobile again, they will need to reset their password.

For customers who no longer use World Travel, Inc.'s services, World Travel, Inc. will suspend their Users access to WorldMobile, on the day after the last day World Travel, Inc. is scheduled to provide services to that customer.

Finally, out of an abundance of caution, to ensure that WorldMobile does not collect personal data about minors, World Travel, Inc. will review its databases that support WorldMobile for any date of birth for persons younger than eighteen (18) years old. If it discovers a record with a date of birth for someone who is younger than eighteen (18) years old, World Travel, Inc. will immediately purge all data associated with that record, including personal data.

### **What is a Travel Profile?**

If you do not have a valid Travel Profile, the app will not work. A Travel Profile is an electronic record that World Travel, Inc. creates and stores in its systems so that it has on hand all of the information it needs to make your travel reservations. A Travel Profile includes your name, e-mail address, form of payment information, employment information, and other variables a customer expects World Travel, Inc. to collect, like department numbers and cost center codes. Every customer is different, so every Travel Profile is different. Suffice it to say, however, that all Travel Profiles include information that you want kept confidential.

For clarity, World Travel, Inc. maintains a Travel Profile for all travelers, regardless of whether they use WorldMobile, or not. World Travel, Inc. is usually obligated to maintain Travel Profiles as part of its contractual obligations to its customers.

### **How WorldMobile Authenticates Users**

Anyone can download WorldMobile from the Apple, Android, or Blackberry App Store (WorldMobile is not available in any other App Store). To ensure that only authorized travelers use WorldMobile, Users need to create an account. To create an account, Users must provide World Travel,

Inc. with their first name, last name, date of birth, email address and mobile phone number. Users will also have an opportunity to create their own password as part of the account creation process.

Upon receipt, World Travel, Inc. will use the User's date of birth and email address to validate that they are, in fact, a traveler who has a valid Travel Profile with World Travel, Inc.

If there is a successful match, World Travel, Inc. will send the User a confirmatory email and their data will be automatically loaded into the app. Thus, the next time the User logs into WorldMobile, their data will be present in the app.

If there is not a successful match, World Travel, Inc. will send the User an email informing the User that there was an issue during registration and to contact [onlinehelp@worldtravelinc.com](mailto:onlinehelp@worldtravelinc.com) for assistance. The user account is created but will remain locked until a valid matching traveler profile is found.

Please note: It may take up to seven (7) days for World Travel, Inc. to successfully validate a traveler and allow access to WorldMobile.

### **WorldMobile Collects Personal Data**

So that you have a clear understanding about the data World Travel, Inc. collects in conjunction with WorldMobile, World Travel, Inc. divided the data into categories. They are: personal data, trip data, device-specific data, and non-personal data. *Please note: World Travel, Inc. already collects and stores personal data, trip data, and non-personal data in the course of providing services to its customers.* The purpose of this policy is therefore to explain to Users specifically what information is available in the app, whether any of that information is shared with parties other than World Travel, Inc., and what kind of control Users can exercise over their data.

**Personal Data.** Because World Travel, Inc. is a travel agency and travel management company, it must collect "personally identifiable information" or "personal data." Given the sensitive nature of personal data, World Travel, Inc. employs a broad definition of personal data. World Travel, Inc. considers any data point that can uniquely identify a person as personal data.

The specific personal data elements collected by World Travel, Inc. in conjunction with WorldMobile are in Table 1, below.

*Table 1: Personal Data*

First Name
Last Name
WorldMobile Username
WorldMobile Password
Additional Email Address
Home Phone Number
Mobile Phone Number
Additional Phone Number
Date of Birth
Air/Car/Hotel/Rail Membership Information
TSA Pre-Check Redress
TSA Pre-Check Known Traveler Number
Home Airport
Passport Number
Passport Issuing Country
Passport Expiration Date
Gender
Birthday
Name as it displays on passport
Emergency Contact Information
Meal Preference (which may reveal Ethnicity)
Seat Preference
Seat Location Preference
Room Type Preference
Smoking Preference
Car Type Preference

In addition to the personal data listed above, World Travel, Inc. assigns a unique identifier to each Travel Profile (a “Sureware ID”). World Travel, Inc. uses this number for its internal use as a means to track Travel Profiles between it and its Travel Profile administration vendor, Sureware LLC (“Sureware”).

**Trip Data.** Trip data is any information about the travel reservations you made with World Travel, Inc., including trips booked using your employer’s online booking tool. World Travel, Inc. recognizes that

while trip data by itself may not be personal data, when trip data is combined with some personal data, trip data can uniquely identify a person.

The trip-specific data elements collected by World Travel, Inc. in conjunction with WorldMobile are in Table 2, below.

*Table 2: Trip Data*

Record Locator/Confirmation Number
Ticket Number
Arrival/Departure City
Flight Number
Arrival/Departure Date Time
Seat Assignment
Vendor Name (i.e. airline, hotel property, car vendor)
Reservation Type (air, car, hotel, rail)
Hotel Address
Hotel Phone Number
Cost
Rate Type
Room Type
Currency
Car Vendor Phone Number
Car Vendor Address
Equipment Type
Corporate Discount
Rail Line
Train Number
Seating Preference
Room Type Preference
Smoking Preference
Car Type Preference

**Trip Itinerary Management Tool powered by TRAXO, Inc.** Some users may be able to import trip data for reservations that World Travel, Inc. did not make (usually referred to as “out-of-program reservations”). This ability is supported by a third party: TRAXO, Inc. (“TRAXO”). TRAXO’s itinerary integration functionality will be enabled for all of World Travel, Inc.’s customers by default. Travel managers are given the ability to opt out on behalf of an entire company, but there is no individual traveler

option by design. Customers do have the ability to opt out, if that occurs any out of program bookings will be deleted from World Travel, Inc.’s systems and will not be viewable through WorldMobile. You cannot elect to “turn on” TRAXO’s functionality for one individual traveler.

If your company elects to enable WorldMobile’s ability to import trip data from reservations that were not made by World Travel, Inc., each traveler will be issued a TRAXO member identification number. The service that TRAXO provides to World Travel, Inc. is described below.

**Device-Specific Data.** Data about your device means any data that can uniquely identify your device. The device-specific data elements collected by World Travel, Inc. in conjunction with WorldMobile are listed in Table 3, below. Data about your device is automatically collected by the app using Google Analytics. World Travel, Inc. reviews data about your device for the purpose of reviewing app utility and User behavior to improve your experience interacting with WorldMobile.

*Table 3: Device-Specific Data*

IP Address
Device Type
Demographic Information
Operating System
User Activity and Interactions with WorldMobile
Device Token

**Non-Personal Data.** Finally, WorldMobile does handle non-personal data. Non-personal data is just that—data that does not reveal any personal information, directly or indirectly. The non-personal data associated with WorldMobile is information about your company’s account with World Travel, Inc., such as the telephone number you can call to speak with a travel counselor and the e-mail address you can use to contact the team of travel counselors assigned to your company. The customer data/non-personal data that WorldMobile handles is set forth in Table 4, below.

*Table 4: Non-Personal Data (Customer Data)*

Agent Phone Number
Agent Text Number
Agent Email Address
Allow out of Program Bookings Setting

Business Account
Company Travel Portal URL

### **Why Does WorldMobile Collect Data?**

WorldMobile is a traveler resource. Thus, it needs to collect and display data so that travelers have access to useful information. World Travel, Inc. only uses data collected by WorldMobile to provide information to travelers and to help its customers get the most out of their travel programs.

### **How Does WorldMobile Collect Personal Data?**

Most of the personal data collected by the app is a result of either a User using WorldMobile to add personal information (e.g., to update their Travel Profile) or the app importing information from World Travel, Inc.'s databases. So that WorldMobile is useful, World Travel, Inc. connects data it has in its databases to the app. Every time you log into WorldMobile the app will collect your username, password, and data about your device.

Effective with version 3.2, WorldMobile users may enable fingerprint identification/touch identification with their device so as to avoid having to re-enter their user name and password each time they want to use the app.

### **Users Can Edit their Personal Data**

One reason for you to use WorldMobile is to manage your Travel Profile. Accordingly, you can edit any of the personal data listed in Table 1 in the app. Any edit that you make to your Travel Profile in the app will be synched with World Travel, Inc. and its profile administration vendor, Sureware.

Users can also change their WorldMobile passwords using the “forgot password” function or by navigating to the password section under app settings.

### **Users Cannot Edit Trip Data or Device-Specific Data**

You *cannot* change or edit trip data or data about your device. That is because WorldMobile is not a booking tool. Users cannot make, change, or cancel travel reservations using WorldMobile. If you need to make, change, or cancel reservations made by World Travel, Inc., you can do so by either contacting

World Travel, Inc. (specifically, the agent team that is assigned to your company’s account and whose contact information is provided in WorldMobile) or by logging into your company’s online booking tool.

If, however, World Travel, Inc. did not make the travel reservations, you must contact the provider that made the travel reservations for you.

**World Travel, Inc. Shares Data with Third Parties (“Third Party Services”)**

One way to think about WorldMobile is as an information hub for travelers who use World Travel, Inc.’s services. Thus, WorldMobile connects to several third parties (“Third Party Services”) so that they, in turn, can deliver relevant information to travelers via WorldMobile. *To be clear, World Travel, Inc. shares personal data with third parties.*

Table 5 lists the third parties that are connected to WorldMobile, the purpose of the connection, and the data elements that are shared between WorldMobile and the third party.

Table 6 lists the third parties connected to WorldMobile, how the data is transferred from WorldMobile to the third party, whether the transfer is encrypted, and whether you can prohibit the transfer so that no data is shared. A “√” indicates that the function is available. If the space is blank, there is no such availability.

World Travel, Inc. strongly encourages you to review the privacy and other policies applicable to any third party and/or Third Party Service. For this reason, it has included in Table 5 below each third party’s web site address.

*Table 5: Third Party Connections, Purpose, and Shared Data Elements*

<b>Name of Third Party</b>	<b>Website</b>	<b>Purpose of Connection to World Mobile</b>	<b>Data Elements that are Shared</b>
<b>SureWare LLC</b>	www.sureware.net	User management of Travel Profile	All Personal Data elements listed above
<b>Air-Port-Codes LP</b>	www.air-port-codes.com	Enhances details about arrival/departure airport if User adds flight information to mobile device calendar options	Arrival/Departure City(ies)
<b>The Weather Company LLC</b>	www.wunderground.com	Displays weather for destination city	Destination City
<b>Google Inc. (Google Maps)</b>	www.google.com/maps	Opens GoogleMaps to allow Users to navigate from their current location to a destination	Destination Address
<b>Microsoft Corporation</b>	www.outlook.com	Allows users to add trip details to MS Outlook Calendar	Trip Specific elements listed above
<b>Apple Inc.</b>	https://www.icloud.com/calendar	Allows users to add trip details to apple device calendar.	Trip Specific elements listed above
<b>Google, Inc. (Google Calendar)</b>	https://www.google.com/calendar	Allows users to add trip details to their google calendar.	Trip Specific elements listed above

<b>Transfermate Ltd trading as Transfermate Inc.</b>	www.transfermate.com	Currency conversion	None
<b>Wikimedia Foundation</b>	www.wikipedia.org	Information about the destination city	Destination City
<b>TRAXO, Inc.</b>	www.traxo.com	Allows WorldMobile users to view out of program bookings through WorldMobile	Any information that is parsed out of a confirmation message as shown listed above
<b>FlightStats, Inc.</b>	www.flightstats.com	Users will receive flight-specific information (e.g., gate changes, delay information) in the app	All Personal Data elements listed above and all Trip Specific Data elements listed above
<b>World Travel, Inc. supported airlines with online check-in functionality</b>	Airline corporate website	24 hours prior to departure, a check-in button will display on the associated airline trip segment. When a user clicks on the check-in button the app will copy the vendor confirmation code onto the user's device clipboard and open the appropriate airline online check-in site. Here the user enters their information and can paste the confirmation number from their device clipboard into the appropriate space for easier check-in.	A user can paste their confirmation number into the airline check-in site.
<b>Google, Inc. (Google Analytics)</b>	www.google.com/analytics	Collects analytics about app utilization for the sole purpose of reviewing app utility	Device-specific data User behavior data

*Table 6: Third Parties, Method of Transfer, and User Control Over Transfer*

<b>Name of Third Party</b>	<b>How is Data Transferred?</b>	<b>Is Data Encrypted in Transit? (√ = yes)</b>	<b>Can User Prohibit Data Sharing? (√ = yes)</b>	<b>How Can User Prohibit Data Sharing?</b>
<b>SureWare LLC</b>	XML synch, using TLS 1.2	√		Users cannot prohibit data sharing
<b>Air-Port-Codes LP</b>	API connection	√		Users cannot prohibit data sharing
<b>The Weather Company LLC</b>	Weather Underground API	√	√	Don't click on WorldMobile's Weather Icon
<b>Google Inc. (Google Maps)</b>	Googlemaps API	√	√	Users will receive a "just in time" notice and may decline data sharing
<b>Microsoft Corporation</b>	Secure SSL Transmission	√	√	Don't click on WorldMobile's Calendar Icon or don't allow WorldMobile to access your calendar
<b>Apple Inc.</b>	Secure SSL Transmission	√	√	Don't click on WorldMobile's Calendar Icon or don't allow WorldMobile to access your calendar
<b>Google, Inc. (Google Calendar)</b>	Secure SSL Transmission	√	√	Don't click on WorldMobile's Calendar Icon or don't allow WorldMobile to access your calendar
<b>Transfermate Ltd trading as Transfermate Inc.</b>	No data is transferred	Not Applicable	Not Applicable	Not Applicable
<b>Wikimedia Foundation</b>	HTTP Basic Auth		√	Don't click on WorldMobile's Info Icon
<b>TRAXO, Inc.</b>	User forwards out-of-program e-mail confirmation to company's	√	√	Don't send email confirming out of program reservation to

	TRAXO email for itinerary integration; service integrates information into WorldMobile			your company's TRAXO email for itinerary integration
<b>FlightStats, Inc.</b>	After a reservation passes through World Travel's quality control system, the reservation is picked up by a PNR import process. The PNR import process sends all air reservations to FlightStats for monitoring via HTTP.	√		Users cannot prohibit data sharing
<b>Google, Inc. (Google Analytics)</b>	Developed with the Google Analytics Android SDK, Google Analytics iOS SDK, and the Google Analytics Plugin for Unity. A Google Analytics Tracking ID also known as the JavaScript tracking snippet is inserted into the app which sends usage data back to World Travel's analytics account.	√		Users cannot prohibit data sharing

In addition to the third parties listed in the tables above, if World Travel, Inc.'s customer uses a corporate online booking tool, that tool is connected to WorldMobile. WorldMobile can support connections to Concur Travel ([www.concursolutions.com](http://www.concursolutions.com)), Deem ([www.deem.com](http://www.deem.com)) and GetThere ([www.gethere.com](http://www.gethere.com)) (these are considered Third Party Services, as well). ***Regardless of the online booking tool connection, WorldMobile cannot be used to book travel.*** You must log onto your company's online booking tool in order to book travel. Thus, WorldMobile only facilitates the connection; you must log into the tool in order to use it.

Additionally, if World Travel, Inc.'s customers book an air reservation with a vendor that has online check-in and is supported by WorldMobile, WorldMobile will facilitate the connection to the airline's check-in website 24 hours prior to departure. WorldMobile can support connections to airlines with online check-in (these are considered Third Party Services, as well). ***Regardless of the airline, WorldMobile cannot be used to book travel.*** Thus, WorldMobile only facilitates the connection to an airline website; the Traveler must enter their information and may enter or paste their confirmation number into the airline website to proceed with the check in process.

Finally, World Travel, Inc. may also disclose your information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that the disclosure is necessary to protect our rights, your safety, or the safety of others, investigate fraud, or respond to a government request;
- if World Travel, Inc. is involved with a merger, acquisition, or sale of all or substantially all of its assets; or involved in due diligence related to a merger, acquisition, or sale of all or substantially all of its assets.

You will be notified by e-mail in the event World Travel, Inc. has to share your information in any of the circumstances set forth above.

**Does WorldMobile or World Travel, Inc. Sell Data?**

No. World Travel, Inc. does not sell data to anyone, nor does it use WorldMobile to collect data so that data can be sold to anyone.

**Does WorldMobile use Cookies?**

No, WorldMobile does not use any cookies.

**Where Does World Travel, Inc. Store Data Collected from WorldMobile, and for How Long?**

World Travel, Inc. stores the data it collects in its databases, which are located in data centers that it owns in Exton, Pennsylvania and Douglasville, Pennsylvania. In fact, WorldMobile does not cause World Travel, Inc. to store any data that World Travel, Inc. would not normally store as part of the services that it provides to its corporate customers.

World Travel, Inc. stores data related to WorldMobile for a maximum of three years, plus the current twelve months, on a rolling basis.

The data stored by World Travel, Inc., including personal data, is not encrypted in its databases. The databases are, however, behind World Travel, Inc.'s network firewalls. World Travel, Inc. also has engaged a third party as its information technology security vendor. If you would like more information about this you can send a message to [privacy@worltravelinc.com](mailto:privacy@worltravelinc.com).

## **WorldMobile’s Privacy Settings; “Do Not Track” Me Options**

WorldMobile does not have any privacy settings that you can control. However, you can control whether you leave the WorldMobile app and use the options provided by one of the third parties.

If you have installed “do not track me” (“DNT”) software on your Smartphone’s internet browser, it will still work as long as the third party site responds to DNT signals.

## **Where Can I Get More Information?**

Users can send any questions about WorldMobile’s privacy policy to [privacy@worldtravelinc.com](mailto:privacy@worldtravelinc.com).

Version	Date	Notes
1.0	5/13/13	Original version
2.0	10/28/16	Policy replaces prior policy; provided in connection with release of WorldMobile 3.0
3.0	7/27/17	Updates to policy to cover app upgrades for fingerprint/touch-enabled ID