

EU-US/Swiss-US Privacy Shield

Last Modified: October 5, 2017

Purpose and Scope

This Unisphere Travel LTD Inc., (DBA; Colpitts Clinical, a Direct Travel Company) EU-US/Swiss-US Privacy Shield Statement explains how the EU-US/Swiss-US Privacy Shield programs apply to Colpitts Clinical. Although we take seriously the personal data of all travelers across all of our businesses, this EU-US/Swiss-US Privacy Shield applies only to Colpitts Clinical and only to personal information that Colpitts Clinical transfers from the EU or Swiss to the Colpitts Clinical in the United States. Neither this privacy statement nor our participation in EU-US/Swiss-US Privacy Shield apply to any travel supplier, travel agent, subscriber, credit card company, organizations that settle transactions between Subscribers and Travel Suppliers (such as the Airline Reporting Corporation and the International Air Transport Association), or anyone else other than Colpitts Clinical.

Collection, Use, and Disclosure

Colpitts Clinical is a provider of travel arrangements for use in the conduct of travel throughout the world using the Sabre GDS system. Acting as the travel agent for our clients (travelers), for each travel itinerary Colpitts Clinical receives Personal Data (Non-exclusive examples of what EU GDS Data could contain include: name, date of birth, gender, postal address, e-mail address, telephone number, credit card and payment information, travel and accommodation details, passport information, and special travel requests, such as a request for a wheelchair or a special meal) from participants, various consultants/subcontractors, and employees. Detailed contractual arrangements, SOPs and business policies govern all our work with customer data.

Travel Network uses EU GDS Data to:

- process travel bookings, but only in so far as processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract,
- perform billing and accounting functions related to the travel,
- perform internal business processes (such as testing and quality assurance), and issue tickets and other travel-related documents on behalf of travelers

Colpitts Clinical discloses EU GDS Data to:

- Travel Suppliers through which you have arranged travel, but only that personal information needed for successful access to or processing of your travel arrangements;
- Subscribers with whom you booked to carry out the services for which you retained them;
- Travel industry organizations that handle financial settlement transactions between Subscribers and Travel Suppliers, such as the International Air Transport Association and the Airline Reporting Corporation; Credit card companies or other payment providers;
- Service providers we use to support our business who provide services such as information processing, managing and enhancing customer data providing customer service, assessing your interest in our products and services, and conducting customer research or satisfaction surveys; and

- In the event of merger, acquisition, or any form of sale of some or all of the Company's assets, in which case personal information held by the Company about its customers will be among the assets transferred to the buyer.

We may also disclose your personal information to third parties to:

- Comply with any court order or other legal obligation or when data is requested by government or law enforcement authorities;
- Enforce or apply our terms of use and any other agreements; or

Protect the rights, property, or safety of the Company, our customers or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

EU-US/Swiss-US Privacy Shield

The European Union (EU) and Switzerland (Swiss) have data protection laws that restrict the transfer of personal information collected in the EU and Swiss to the United States unless there is "adequate protection" for such information when it is received in the United States. As one non-exclusive way to satisfy this requirement, Colpitts Clinical has certified to the United States Department of Commerce that it complies with the EU-US/Swiss-US Privacy Shield programs with respect to personal information that Colpitts Clinical in Europe collect from the EU and Swiss and send to Travel Network via the Sabre GDS.

To learn more about the EU-US/Swiss-US Privacy Shield program and to view Colpitts Clinical certification, please visit: www.colpittsworldtravel.com.

With respect to EU GDS Data, Colpitts Clinical adheres to each of the EU-US/Swiss-US Privacy Shield Privacy Principles as follows:

- **Notice.** By this statement, Colpitts Clinical is notifying individuals about the purposes for which Colpitts Clinical collects and uses information about them. This statement also provides information to individuals about how they can contact Colpitts Clinical with any inquiries or complaints, the types of third parties to which Colpitts Clinical discloses the information and the choices and means individuals may use to limit Unisphere Travel LTD Inc., (DBA; Colpitts Clinical, a Direct Travel Company) use and disclosure of information relating to those individuals. In addition, Pursuant to the European Union Code of Conduct for Computerized Reservation Systems, you may contact your travel agent for information about data about you in the SabreGDS.
- **Choice.** Subject to the European Union Code of Conduct for Computerized Reservation Systems and other government regulations and industry requirements, Colpitts Clinical will give individuals the opportunity to choose (opt out) whether their personal information will be disclosed to a third party or used for a purpose incompatible with the purpose for which it was originally collected or subsequently authorized by the individual. Where special categories of data referred to under Article 8 of Directive 95/46/EC are involved, such data shall only be processed where the data subject has given his or her explicit consent to the processing of those data on an informed basis.
- **Onward Transfer (Transfer to Third Parties).** To disclose information to a third party, Colpitts Clinical will apply the Notice and Choice Principles set out above. Where Colpitts Clinical wishes to transfer information to a third party that is acting as an agent, Colpitts Clinical may do so only after ensuring that the third party subscribes to the EU-US/Swiss-US Privacy Shield Principles or is subject to the Directive or another adequacy finding by the European Commission.

As an alternative, Colpitts Clinical can enter into a written agreement with such third party requiring that the third party provide at least the same level of privacy protection as is required by any of the relevant Principles. Colpitts Clinical remains responsible and liable for the onward transfers of Personal Data to Third Parties received pursuant to the EU-US/Swiss-US Privacy Shield.

- **Access.** Subject to the CRS Code of Conduct and other government regulations and industry requirements, individuals should contact their travel agent to access personal information about them that Colpitts Clinical holds and to be able to correct, amend, or delete that information where it is inaccurate, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.
- **Security.** Colpitts Clinical will take reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction.
- **Data Integrity.** Colpitts Clinical will take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current, and that personal information will be relevant for the purposes for which it is to be used by ColpittsWorld Travel.
- **Enforcement.** Colpitts Clinical verifies adherence to the EU-US and Swiss-US Privacy Shield Frameworks by means of in-house verification by the management of this company. In addition, Colpitts Clinical agrees to use the International Centre for Dispute Resolution/ American Arbitration Association EU-U.S. Privacy Shield, as its independent recourse mechanism. All disputes shall be finally settled under International Dispute Resolution Procedures of the International Centre for Dispute Resolution by one or more arbitrators appointed in accordance with the said Procedures. The location of any in-person hearing will be Boston, Massachusetts but Colpitts Clinical also consents to any hearing being conducted by telephone or video conference. Colpitts Clinical is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

In compliance with the Privacy Shield Principles, Unisphere Travel LTD Inc., (DBA; Colpitts Clinical, a Direct Travel Company) commits to resolve complaints about our collection or use of your personal information. EU/Swiss individuals with inquiries or complaints regarding this privacy policy should first contact Colpitts Clinical at:

Jeff Brown
Colpitts World Travel
Attn: Privacy Office
10 Cottage Street
Norwood, MA 02062

privacyma@colpittswt.com
Phone: 781.326.7800
Fax: 781.326.2921

Colpitts Clinical has further committed to refer unresolved privacy complaints regarding EU/Swiss personal data under the [ICDR/AAA Privacy Shield Program](#). If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [ICDR/AAA Privacy Shield Program](#) for more information and to file a complaint. The services of ICDR/AAA Privacy Shield Program is provided at no cost to you.

HR Recourse Mechanism

Non-HR Recourse Mechanism

[EU Data Protection Authorities \(DPAs\)](#)

[ICDR/AAA Privacy Shield Program](#)

[Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

To learn more about Colpitts Clinical certifications, please visit the EU-US/Swiss-US Privacy Shield website <https://www.privacyshield.gov/>.