

PRIVACY POLICY

GENERAL INFORMATION

CTS Travel Recommends Inc. (“FP”; “Flytpack”; “We”; “Us”, “Our”) respects and commits to protect your personal data privacy and complies with the data protection principles and provisions under the Personal Data (Privacy) Ordinance (the “Ordinance”).

FP may collect, use, process and disclose your information when you use this website (the “Website” and the services and products (the “Services”) provided by FP or third party merchants (the “Merchants”)

This privacy policy (the “Privacy Policy”) describes the personal data that Flytpack (the “FP”) collects about you. It details how FP would use, disclose and protect this data, as well as your access and correction rights over this data.

Please read through this set of Privacy Policy carefully. If you decide to continue to use these platforms, you signify that you have read, understood, consent and agree to adhere to this Privacy Policy as revised from time to time in respect of FP collection, use and disclosure of your personal data.

COLLECTION OF PERSONAL DATA

FP may collect data about you from a variety of sources, including data we collect from you directly while you are using this website as well as information about how you use this website, visit this website or make reservations for any intended services or using the services.

During your use of the website or when you communicate with us, we may collect your personal information, shopping preferences, payment details etc. Such personal information may include personal information relating to or linked to specific individual such as name, residential address, contact number and email address (the “Personal Information”).

USE OF COOKIES

We may also use “Cookies” (small files stored on your computer). Cookies hold a small amount of information specific to you, and remember your specific activities on the website.

By doing so, this allow us to customer your future visit. We do not use cookies to collect any individually-identifiable information.

Your computer can be programmed to inform you each time a cookie is being used in this manner. If you wish, your computer can be configured to prevent the use of cookies.

LINKS TO THIRD PARTY WEBSITES

We may provide links to third-party websites on our websites. Such third-party websites are subject to their own privacy policies and are not covered by this privacy policy.

Making reservations using the website:

- When you visit this website, make reservations for any intended services or use the services, we may collect and process information, which may contain personal information or may contain non-personally identifiable information, but nevertheless linked to your personal information, includes but not limited to those set out below:
 - Copies of correspondences (be it through email, instant messaging, WhatsApp, social media direct messages or otherwise) between you and us;
 - And between you and the merchants;
- Details of your usage of this website (including monitoring the number of times you have visited, number of pages you go to, traffic data, location data, time spent on the website and the originating domain name of the user's internet service provider. These data will be aggregated, so we will not be able to identify you individually.
- Feedback on and the responses to surveys that FP may carry out relating to the services and newsletters which may be published, distributed or circulated.
- Information that are automatically collected and stored in our server or server of our third-party service providers by using or accessing to this website.

STORAGE OF PERSONAL INFORMATION

The personal information and other data collected may be transferred to, processed, and stored in our servers or servers of our third-party service providers.

FP will use reasonable endeavours to maintain appropriate physical, electronic and organisational procedures in ensuring that the personal information and other data is secured and in accordance with this privacy policy, and to protect such data against unauthorised access or unauthorised alternation, disclosure or destruction of data.

FP will use strict procedures and security features to try to prevent unauthorised access. FP does not give any representation, warranty or undertaking that the personal information you provided will be secure at all times, and to the extent FP has fulfilled its obligations under no circumstances shall FP be responsible for any losses, damages, cost and expenses which you may suffer or incur that arise from unauthorised access to or use of your personal information.

All payment transactions carried out on our website will be through a secured payment gateway system by our appointed payment partner. All processes are encrypted using online encryption technology. FP does not store any credit and (or) debit card information you have entered in our systems.

HOW WE USE YOUR PERSONAL INFORMATION

We use the data to provide, as well as to improve our website services. FP will not sell or rent out personal information to third parties. We may use your personal data for more than one of the following:

- To help us identify you and any accounts you may hold with us.
- Administration
- Statistical analysis
- Customer (User) profiling and analysing your consumption preferences
- Marketing
 - For us and (or) our business partners to contact you by mail, telephone, SMS, text or image or video message, email about products, services and promotions and exclusive offers
- Fraud prevention and detection
- Billing and order fulfilment
- Customising the website and its content to your preferences
- To notify you on the changes to the website or our services which may affect you
- Security vetting
- Improving our services
- To administer contest, sweepstakes or other similar promotions
- Such other purposes as may be given to you at the time your data is collected

FP may also make use of the personal information to contact you for feedback on the use of the website and services, to assist us in improving the website, or to offer special savings or promotions to you, where you have indicated your consent to receiving such communications. If you prefer not to receive such notices, you may choose to opt out by replying to us through the hyperlink provided in any of the notices and (or) communications.

DISCLOSURE OF PERSONAL INFORMATION

FP may from time to time, if the need arises, share and disclose your personal information and other data to third parties, some of whom may be located outside your home country. The situations under which such sharing and disclosure will take place may include, without limitation, the following:

- If you are a consumer, to the relevant merchant in partner with a service which you have made reservations for, or intend to make reservations for.
- To complete the reservations, online purchase or otherwise implement our Terms of Use.
- If you are a merchant, to any consumer in connection with the services you are offering.

- To our third-party service providers (including Google Analytics) which FP engage for the performance of services on our behalf, such as web-hosting, data analysis, marketing, research and to otherwise provide you with customer service.
- To any extent, if needed by any applicable law, order of court or requests by any governmental authority to make such disclosure.
- To our advisors, agencies, companies within our group and holding company, credit reference agents, business partners or other parties concerned in order to protect the rights and property of FP.
- In any other case, to any third parties with your prior written consent.

DATA ACCESS AND CORRECTION

You may correct your personal information by sending your request in an email to hello@flytpack.com. When handling a data access request, FP have the right to check the identity of the requester to make sure that the requester is entitled to make a data access or correction request.

This privacy policy is reviewed from time to time. FP will post any changes to the Privacy Policy on this page. We recommend that you visit and check on this page regularly for any updates.

If you have any queries about personal information in terms of access to, or to revise any inaccuracies in your personal information, please contact us by email – hello@flytpack.com

Updated as of Jul 2017