PERSONAL DATA PROCESSING POLICY

ROLF WITTMER - TIP TOP TRAVEL GROUP OF COMPANIES

The ROLF WITTMER - TIP TOP TRAVEL group of companies (hereinafter referred to as the "Group of Companies") is committed to the protection of your personal data and, therefore, to the privacy of its users. In compliance with this commitment, we have established a Privacy Policy that describes the personal data processing practices in accordance with current legislation.

This policy reflects the company group's appreciation of its users and its commitment to the treatment, security and privacy of their personal information.

GENERAL CONSIDERATIONS:

When you use the services of the corporate group, through our websites such as: https://www.tiptoptravel.ec/ and https://www.rwittmer.com/; call center, email, head office, branches, among others; the corporate group collects your personal data in order to use them later. The purpose of this Privacy Policy is to provide information on how such personal data is processed, in order to help you understand this process.

The corporate group reserves the right to change or modify this Policy at any time and is committed to informing you of any significant modifications. If you have questions about this policy or practices, we encourage you to contact us through our communication channels, suggestions, or through your trusted sales agent.

By accepting this Privacy Policy, you authorize the corporate group to process your personal data for the purposes detailed in this Policy.

GENERAL PRINCIPLES OF DATA PROTECTION:

- **Legality:** Personal data will be processed in strict compliance with the principles, rights and obligations established in the Constitution of the Republic of Ecuador, international instruments, the Organic Law for the Protection of Personal Data, the Regulations to the law; and, the current and applicable legal provisions governing the processing of personal data and other related fundamental rights.
- **Fairness:** All collection and processing of personal data will be carried out in accordance with this Policy and to fulfill the purposes set forth in this Policy and will not be processed for unlawful or unfair activities.
- **Transparency:** The processing of the data collected, if requested, will be easily accessible by the data owner.
- **Purpose, relevance and minimization of personal data:** The Business Group wishes to collect the least amount of personal data necessary, so that it collects only those necessary to fulfill the purposes set forth in this policy.

- **Quality and Accuracy:** the personal data that will be processed must be accurate and complete in order to comply with the tourist reservations, for which the group reserves the right to verify the accuracy of the information.
- **Retention:** When a personal data is no longer needed and we have no legal obligation to store the data collected, the information provided will be deleted, destroyed or anonymized.
- **Personal data security, proactive and proven responsibility:** the business group uses international standards and certifications to ensure the implementation of adequate security measures necessary for its users and customers. As always, these measures are preventive and we are constantly updating and improving them.

BASIC CONCEPTS AND MAIN DEFINITIONS:

The following will define key terms to understand the protection of your personal data, the limits of our processing and your rights:

1. **Personal Data:** information that directly or indirectly identifies a natural person.
2. **Data Subject:** Person to whom the data belongs.
3. **Treatment:** Any action related to the management of information, for example, collection, registration, organization, preservation, custody, adaptation, modification, deletion, among others.
4. **Data Controller:** person focused on making decisions related to the processing of personal data of the owners.
5. **Data Processor:** person in charge of the processing of personal data provided by the Data Controller on behalf of the Data Controller.
6. **Consent:** voluntary and informed authorization of the data subject for his data to be processed by a data controller.
7. **Anonymization:** process through which the identification of the holders of personal data is prevented.

RIGHTS OF USERS AND CUSTOMERS OF TIP TOP TRAVEL AND ROLF WITTMER

The Organic Law on Personal Data Protection grants you certain rights as the owner of your personal data, which may be exercised as set forth below:

a. Verify and inquire about the use and processing of your personal data.
b. Obtain details about how the processing of your personal data is being carried out.
c. Request to correct any information that is incomplete, inaccurate or outdated.
d. Request the anonymization, blocking or deletion of personal data that you consider unnecessary, excessive or are being processed unlawfully or for purposes other than those set forth in this policy.

e. Obtain information about the persons or public or private institutions that have access to your data through the corporate group.
f. Withdraw your consent to the processing of data and obtain information about the consequences of such revocation.
g. Revoke your consent to the collection of new personal information or to perform updating.

PERSONAL DATA AND ITS TREATMENT:

The following is the category and type of data collected and stored by the business group, according to the information provided by the user or customer, as detailed below:

TYPE	DEFINITION ESTABLISHED IN THE LAW	INFORMATION COLLECTED BY THE CORPORATE GROUP
Personal Data	It allows to determine the identity of a person from information of persons directly or indirectly.	Names and surnames, identification number (ID card, passport, RUC), telephone number, date of birth, nationality, e-mail, ballot, postal code.
Sensitive Data	Information that requires special protection because it contains information that, by its nature, may cause discrimination or abuse if improperly handled.	Country of origin, gender, interests, likes and dislikes, height, weight, drug use information, military service information, membership in a charitable organization, immigration history, photographs, number of fingerprints, etc.
Credit data	It allows to know the credit or equity solvency of individuals, assets, debts, income or aspects of the financial situation.	Number of bank accounts, type of bank accounts, amount of consumption, employment data, VAT returns, investment certificates or accumulation policies, credit card information, debit card information, security code, expiration date and the name of the cardholder.
Health, disabled, children and adolescents data	Information related to the physical or mental health of individuals, as well as data provided by legal representatives, parents or guardians of minors are also sensitive.	Information on physical or mental illnesses, copy of disability card, type of disability, information on children and adolescents in general, identified as personal data.

The data collected is used to make tourist reservations. For this purpose and at its sole discretion, the business group may verify the personal data provided in public institutions or credit bureaus, for which you expressly authorize us. The information provided will be treated confidentially and in compliance with the regulations applicable to this policy.

Users and/or clients have the option of not providing us with their personal data, however, in general, this information is necessary to complete tourist reservations. In addition, in the case of making a reservation on behalf of another person, it is necessary to obtain the prior consent of the holder before providing us with their personal data. If such person is a minor, you represent that you have the consent of at least one of the minor's parents or legal guardian to provide their personal data and accept this Privacy Policy on their behalf.

We are continually improving our services, so we value your opinion. The corporate group collects your suggestions and comments through surveys or forms that you fill out voluntarily. In this context, by providing real testimonials about your travel experiences, you agree that these may be published on our websites or channels, with the possibility that your identification, photo, comment, nationality or other relevant information may be used.

By providing feedback or multimedia content, you understand that such material will not be treated as confidential and may be used by the corporate group for commercial or marketing purposes. Accordingly, you waive any rights to such material, including rights of ownership and publicity. Therefore, you grant us a non-exclusive, unrestricted, royalty-free license to use, transmit, copy and display the views through our channels.

As always, and in compliance with the Organic Law on Personal Data Protection, you have the right to request at any time the deletion or anonymization of your information.

PURPOSE OF DATA PROCESSING

The business group uses the personal data collected for the following purposes:

a. Manage your tourist reservation, carry out the transactions you have initiated and process the data for billing or tax documentation related to the reservation. In addition, we maintain a record of the reservations on our server.
b. Sending information of services, alliances, contests, offers and advertising that the business group considers appropriate to communicate to the user, either individually or in collaboration with third parties, for the effect, the means that we can use are: email, text message, via telephone or urban mail.
c. Ensure the exercise of customer rights, for which the business group will manage their requests and address their questions or comments.
d. d. Contacting our clients via email or telephone to evaluate and measure the satisfaction of our clients with respect to our services.

e. Contact via email, text message, WhatsApp or other instant messaging services, using the data provided by you.
f. The business group will use the credit information to manage the travel reservations you make, including sending data to final service providers in order to manage your purchase request depending on the service, this may include collections, making and processing payments, among others, solely for the provision of the service.
g. Perform internal analysis on sales and/or consumption patterns.

PROCESSING OF NAVIGATION DATA

Browsing information consists of data collected from the use of the website without requiring prior identification. For example, it typically includes IP address, cookies, browser information, network type and device identification. This information is collected and processed for the following purpose:

Primary Purpose	Data	Applicable Legal Basis	Conservation period
Analyze the time spent on the website to detect errors and improve the user experience.	Navigation data.	Organic Law on Personal Data Protection and its Regulations (Consent).	The stored data will be kept as long as you do not ask us to cancel it or it reaches its expiration date, which will not exceed 24 months.

TRANSFER OF PERSONAL DATA

In cases where the corporate group needs to transfer personal data to third parties, such as suppliers, a roadmap will be established identifying the purpose of the transfer, the name of the receiving company or institution, as well as the identification of those responsible and in charge. Additionally, the reason for the transfer shall be detailed.

CONSENT:

The corporate group shall obtain consent and authorization for the processing of personal data explicitly or tacitly. This authorization may be obtained through online forms, web pages, manual forms, or through a QR code that allows the entry of informed consent for the use of personal data according to the purposes set forth in this policy.

Notwithstanding the foregoing, the corporate group may obtain tacit consent when the user uses online tools to make travel reservations, for the provision of specific services, or during the coordination or development of an event.

SECURITY, CONSERVATION TIME, MODIFICATION AND DELETION OF THE TREATMENT

The corporate group protects the information through a cloud server with encryption and specific permissions, ensuring standardized good practices for the provision of the service and the conduct of tourism operations.

Once the service is concluded, unnecessary personal data and not subject to legal obligations established by the authorities in Ecuador for the formulation, exercise or defense of claims, will be eliminated, deleted or anonymized, as appropriate and in strict observance of the retention period established by law. This term will be determined according to the client, considering the periodicity or frequency of its consumption.

Users are free to consult the information held by the corporate group, being able to contact it by e-mail or by contacting a person in the call center. In addition, the corporate group is obliged to rectify and update the data, as well as to meet the requests of the holders to ensure the accuracy of the information.

In the event that a holder wishes to delete their data, considers that their data is being processed contrary to the principles set out in this policy, or the data is no longer necessary for the purpose of processing, they may request in writing via email or in writing to delete their data. The corporate group will guarantee the anonymization, illegibility and total or partial deletion according to the holder's request, following international standards, within 15 days after receipt of the request.

REVOCATION OF CONSENT:

At the time they deem appropriate, the holders have the right to request the corporate group to withdraw their consent to the processing. This revocation may be total or partial as detailed below:

- Total revocation: implies the deletion for all the purposes agreed in the present policy, which means that the business group must completely stop processing the data of the holder.
- Partial revocation: this revocation applies to a specific processing agreement, for example, for advertising purposes or for consumer analysis and market research.In this case, the information will be retained for other purposes established by the corporate group in accordance with the authorization granted.

DATA PROTECTION WITHIN THE CORPORATE GROUP

All employees of the corporate group are subject to clauses guaranteeing the responsible use, confidentiality and proper handling of the information they are responsible for. In addition, the IT department may authorize data reviews and conduct audits on the handling of information when necessary. In order to comply with current Ecuadorian regulations, the identification of the data controller is established:

- ✓ Data controller: Legal Representative.
- ✓ Place of domicile: Leónidas Plaza y Lizardo García, Quito - Ecuador.
- ✓ E-mail: sales@tiptoptravel.ec
- ✓ Telephone number: (+ 593 2) 256 3181.