

Jennie B Travels - Privacy & Security Policy

Effective Date: April 11, 2025

1. Our Commitment to Your Privacy & Security Jennie B Travels ("we," "us," "our," or "Jennie B Travels") is committed to protecting the privacy and security of your personal information. This Privacy & Security Policy ("Policy") describes how we collect, use, disclose, and safeguard your information when you visit our website (jenniebtravels.com, the "Website"), engage our travel planning and booking services (the "Services"), or otherwise interact with us.

This Policy also outlines our commitment to securing the data you entrust to us. By using our Website or Services, you agree to the terms of this Policy. Please read it carefully.

2. Information We Collect We may collect various types of personal information ("Personal Information") to provide and improve our Services, including:

- **a. Personal Identifiers:**
 - Full name, postal address, email address, phone number(s).
 - Date of birth, gender, nationality.
 - Passport details (number, expiration date, country of issue), visa information.
 - Known Traveler Number (KTN), redress number, or other government-issued travel identifiers.
 - Loyalty program numbers (airline, hotel, car rental).
- **b. Payment Information:**
 - Credit or debit card numbers, expiration dates, security codes, and billing addresses. (As noted in our Terms & Conditions, payments for travel components are typically made directly to Suppliers or our host agency, Legato Travel, LLC. We collect payment information to facilitate these transactions and to process our direct professional service fees.)
- **c. Travel Information:**
 - Travel itineraries, flight information, accommodation details, cruise bookings, tour packages, car rental details.
 - Travel preferences (seat preferences, meal requests, special assistance needs).
 - Information about travel companions, including their Personal Identifiers if you provide them for a booking.
 - Emergency contact information.
- **d. Health Information (When Voluntarily Provided for Travel Needs):**
 - Information related to health conditions, allergies, dietary restrictions, or mobility limitations that you voluntarily provide to us if relevant to your travel arrangements or to request special accommodations. We will only collect and use this sensitive information with your explicit consent and as necessary to fulfill your travel requirements.
- **e. Communications:**

- Records of your communications with us, including emails, phone call summaries (if applicable), and messages sent through our Website or social media.
- **f. Technical Information (from Website Usage):**
 - IP address, browser type, operating system, device information, referring URLs, pages viewed, and dates/times of access.
 - Information collected through cookies, web beacons, and similar tracking technologies (see Section 5: "Cookies and Tracking Technologies").
- **g. Information from Third Parties:**
 - If travel is booked for you by a third party (e.g., a family member or employer), we may receive your Personal Information from them.

3. How We Collect Your Information

- **Directly from You:** When you fill out forms on our Website, request a quote, book travel, subscribe to our newsletter, communicate with us via email or phone, or otherwise provide it to us directly.
- **Automatically:** When you use our Website, we may collect technical information automatically through cookies and other tracking technologies (see Section 5).
- **From Third Parties:** As mentioned above, from individuals booking on your behalf, or from our affiliated partners (like Legato Travel, LLC when services are rendered under that affiliation).

4. How We Use Your Information We use your Personal Information for the following purposes:

- **a. To Provide and Manage Your Travel Services:**
 - Researching, planning, and booking flights, accommodations, cruises, tours, transportation, and other travel components.
 - Managing your reservations and itineraries.
 - Communicating with you about your bookings, including confirmations, updates, changes, and disruptions.
 - Providing customer support and responding to your inquiries.
- **b. To Process Payments:**
 - To collect our professional service fees.
 - To securely transmit your payment information to travel Suppliers or our host agency, Legato Travel, LLC, for the payment of travel services.
- **c. For Communication and Marketing (With Your Consent):**
 - To send you newsletters, promotional offers, travel deals, and other information about our services that may interest you (you may opt-out at any time).
 - To inform you about changes to our terms, services, or policies.
- **d. For Personalization:**
 - To understand your preferences and tailor our service offerings and communications to you.
- **e. For Legal, Regulatory, and Safety Purposes:**

- To comply with applicable laws, regulations, court orders, or other legal processes.
- To protect the rights, property, or safety of Jennie B Travels, our clients, or others.
- To prevent and detect fraud or other illicit activities.
- **f. To Improve Our Services and Website:**
 - For internal analysis, research, and development to enhance our offerings and website functionality.
- **g. As Otherwise Described to You:** At the point of collection or with your consent.

5. Cookies and Tracking Technologies Our Website may use cookies (small text files placed on your device) and similar tracking technologies (e.g., web beacons, pixels) to:

- Enable essential website functions.
- Remember your preferences and settings.
- Collect information about your Browse activities to help us analyze website traffic and improve user experience.
- Potentially deliver targeted advertising (with your consent where required).

You can usually manage your cookie preferences through your web browser settings. Disabling certain cookies may affect the functionality of our Website.

6. How We Share Your Information We do not sell your Personal Information. We may share your Personal Information with the following categories of third parties only as necessary for the purposes described in this Policy:

- **a. Travel Suppliers:** Airlines, hotels, cruise lines, tour operators, car rental companies, activity providers, and travel insurance providers to fulfill your booking requests. These Suppliers will process your Personal Information in accordance with their own privacy policies.
- **b. Legato Travel, LLC:** When your booking is made under our affiliation with Legato Travel, LLC, as indicated on your quote and invoice, we share necessary information with them to process your booking and for them to fulfill their Seller of Travel obligations.
- **c. Payment Processors & Financial Institutions:** To securely process payments for our service fees and to facilitate payments to Suppliers.
- **d. Global Distribution Systems (GDS) and Booking Systems:** Technology partners that enable us to search for and book travel services.
- **e. Service Providers:** Third-party vendors who perform services on our behalf, such as IT support, data hosting, email distribution, marketing assistance, and customer relationship management (CRM) systems. These providers are contractually obligated to protect your information and use it only for the services we engage them for.
- **f. Legal Authorities:** If required by law, subpoena, court order, or other legal process, or if we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.
- **g. Business Transfers:** In the event of a merger, acquisition, sale of assets, or other business restructuring, your Personal Information may be transferred as part of the

transaction, subject to the acquirer adhering to the commitments made in this Policy (or providing notice of changes).

- **h. With Your Explicit Consent:** For any other purpose disclosed to you at the time we collect your information or pursuant to your consent.

7. Data Security: How We Protect Your Information We are committed to protecting the security of your Personal Information. We implement reasonable administrative, technical, and physical safeguards designed to protect your information from unauthorized access, use, disclosure, alteration, or destruction. These measures include:

- **a. Secure Transmission:** Using Secure Socket Layer (SSL) or Transport Layer Security (TLS) encryption for data transmitted over our Website.
- **b. Access Controls:** Limiting access to Personal Information to authorized personnel who have a legitimate business need to access it.
- **c. Payment Security:**
 - For our direct professional service fees where Jennie B Travels is the merchant of record, we utilize payment processing solutions that are compliant with Payment Card Industry Data Security Standards (PCI DSS). We do not store your full credit card details on our own systems after a transaction is processed for our fees.
 - When you provide payment information for services rendered by Suppliers, we securely transmit this information to the Supplier or Legato Travel, LLC, as applicable, for processing according to their security protocols.
- **d. Secure Storage:** Storing Personal Information in secure environments and using encryption for sensitive data where appropriate.
- **e. Vendor Security:** Taking steps to select and retain service providers that are capable of maintaining appropriate security measures.
- **f. Employee Training:** Educating our personnel on the importance of data privacy and security.
- **g. Incident Response:** Having procedures in place to respond to potential data security incidents.

Disclaimer: While we strive to use commercially acceptable means to protect your Personal Information, no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security.

8. Data Retention We will retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected, including to provide you with our Services, comply with our legal and contractual obligations (e.g., financial record-keeping, Seller of Travel requirements), resolve disputes, and enforce our agreements. The retention period may vary depending on the type of information and the context.

9. Your Rights and Choices Subject to applicable law, you may have certain rights regarding your Personal Information:

- **a. Access:** You may request access to the Personal Information we hold about you.
- **b. Correction (Rectification):** You may request that we correct any inaccurate or incomplete Personal Information.
- **c. Deletion (Erasure):** You may request that we delete your Personal Information, subject to our legal and contractual retention obligations.
- **d. Opt-Out of Marketing Communications:** You can unsubscribe from our marketing emails by clicking the "unsubscribe" link provided in such emails or by contacting us directly. You may still receive transactional communications related to your bookings or services.
- **e. Cookie Management:** You can manage your cookie preferences as described in Section 5.

To exercise these rights, please contact us using the information in Section 13 ("Contact Us"). We will respond to your request in accordance with applicable law. We may need to verify your identity before processing your request.

10. International Data Transfers To provide our Services, your Personal Information may be transferred to, stored, and processed in countries other than your country of residence, including the United States (where Jennie B Travels is based) and other countries where our Suppliers and service providers are located. These countries may have data protection laws that are different from those in your country. We will take appropriate steps to ensure that your Personal Information is treated securely and in accordance with this Policy and applicable law when it is transferred internationally, primarily by ensuring such transfers are necessary for the performance of our contract with you (i.e., to book your travel).

11. Children's Privacy Our Services are intended for use by individuals who are 18 years of age or older. Jennie B Travels does not knowingly solicit or collect personal information online directly from children under the age of 13 in contravention of the Children's Online Privacy Protection Act (COPPA) without verifiable parental consent.

If you are a parent or guardian making a booking that includes children (individuals under the age of 18), we will collect and process personal information about those children as necessary to provide the requested travel services. This information must be provided by you, the parent or legal guardian, who is authorized to consent to the collection and processing of such children's personal information for the purposes of the travel booking.

If you are a parent or guardian and believe that your child under the age of 13 has provided us with personal information online directly without your consent, please contact us using the information in Section 14 ("Contact Us"). If we become aware that we have inadvertently collected personal information online directly from a child under 13 without appropriate parental consent, we will take steps to delete such information from our records.

12. Third-Party Links Our Website may contain links to other websites operated by third parties (e.g., tourism boards, Suppliers). This Policy does not apply to third-party websites. We encourage you to review the privacy policies of any third-party websites you visit.

13. Changes to This Privacy & Security Policy We may update this Policy from time to time to reflect changes in our practices, legal requirements, or for other operational reasons. We will post any changes on this page and update the "Effective Date" at the top. We encourage you to review this Policy periodically. Your continued use of our Website or Services after any changes constitutes your acceptance of the revised Policy.

14. Contact Us If you have any questions, concerns, or requests regarding this Privacy & Security Policy or our data practices, please contact us at:

Jennie B Travels

Attn: Privacy Compliance

610 Cardinal Dr

Bryan, OH 43506

Email: privacy@jenniebtravels.com

Phone: 419-551-7687