

Welcome to our X38 website.

We at X38 Travel Solutions ("X38") recognize the importance of protecting the privacy of personal data or personally identifiable information ("Personal Data") about the individual travellers that we process in our Internet Booking Engine ("IBE"). Please note, however, that we may update and amend this Privacy Policy ("Policy) from time to time.

We recommend that you should carefully review our privacy policy before proceed to use our services and/or to browse our website.

In respect of any personal data processed by our IBE or our sub-processor, by proceeding further, and to use our services, you are hereby agreeable to the following terms and conditions:

Collection, use and disclosure

X38 obtains IBE Personal Data when a Travel Provider or a Subscriber submits such data to X38 IBE. We also receive IBE Personal Data when an individual traveller submits data to us directly; however, this occurs only in limited circumstances. The types of IBE Personal Data that we obtain is the typical information for performing of travel booking services.

We use IBE Personal Data to help create and perform the underlying contracts between Travellers and Travel Providers and Subscribers. We consequently disclose IBE Personal Data to those entities, as well as to the sub-processors that act on their behalf. We also process IBE Personal Data for our legitimate business interests. More specifically, we use IBE Personal Data to:

- Process travel bookings.
- Provide Subscribers and Travel Providers with access to travel information.
- Make and change travel bookings.
- Perform billing and accounting functions related to the travel.
- Perform internal business processes (such as testing, quality assurance, and product development and enhancement).
- Conduct scientific, statistical, and research activities regarding travel trends.
- Conduct loss prevention and anti-fraud activities.
- Provide customer support and help desk services.
- Issue vouchers, tickets and other travel-related documents on behalf of travellers.

We also disclose IBE Personal Data to vendors that perform functions on our behalf, including travel providers/inventory suppliers, business processing service providers, call center service providers, and server hosting providers. We

contractually require these vendors to maintain appropriate protections for IBE Personal Data and to only process such data in accordance with our instructions. We may also process and disclose IBE Personal Data when lawfully requested by public authorities, including requests based on national security or law enforcement requirements; for credit card processing, authentication, and fraud prevention; or as otherwise required or permitted by law, subpoena, or regulation. We do not sell IBE Personal Data for purposes of allowing third parties to conduct direct marketing for their own products or services.

Description of Transfer

The categories of data subjects

Travellers & the Subscriber (i.e., employees of the Subscriber).

The subject matter of the processing

Travel booking services.

Categories of data subjects whose personal data is transferred

Traveller information (addresses, telephone numbers, emails addresses, passport and/or VISA information), booking information, travel inventory (hotel, flight, activities) information, payment information, and other information as necessary to provide travel booking services to Subscribers and Travellers.

Categories of personal data transferred

Arrival date, # of nights or departure date, room type, rate type, traveller name, address, phone number, email address, payment type, etc.

The frequency of the transfer

Continuous.

Nature of the processing

Processing of booking services data for Subscriber/Customer to provide connectivity services.

Purpose(s) of the data transfer and further processing

Travel Booking services for service rendered, access and distribution of travel inventory, payment processing, etc.

The period for which the personal data will be retained, or, if that is not possible, the criteria used to determine that period

Personal data will only be retained for the period necessary to provide the required connectivity service pursuant to the Subscriber/Customer's service order, up to maximum 5 years.

Data security and integrity

X38 maintains appropriate technical and organizational measures to protect Personal Data from loss, misuse, and unauthorized access, disclosure, alteration and destruction. X38 also takes reasonable steps to keep Personal Data accurate, current, complete, and reliable for its intended use.

Whenever X38 uses third party sub-processors to process Personal Data on its behalf, we will ensure that they do so for specified purposes and on its instructions only.

The security of all information we receive is an important concern to us. We exercise care in providing secure transmission of your information from your computer to our servers. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, X38 can't ensure the security of any information you transmit to us or from our online products or services, and you do so at your own risk.

In the event of any personal data breach related to this , we shall take reasonable steps to remedy or mitigate the effects of and to minimise any damage resulting from the personal data breach.

Data retention

X38 retains IBE Personal Data no longer than is necessary to comply with legal obligations and to fulfil legitimate business and compliance purposes.

De-personalized data

X38 analyses, uses, discloses, and processes statistical and other data in de-personalized (anonymized) form that X38 obtains or generates in connection with its X38 IBE business. This data is used to identify trends and other activities in the travel industry.

International transfers of Personal Data

Personal Data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for our vendors. Such staff maybe engaged in, among other things, the fulfilment of the services you receive from us, the processing of your payment details and the provision of support services. By submitting your Personal Data, you agree to this transfer, storing or

processing. The countries that your Personal Data may be transferred to may have laws that differ from the laws of your country.

Law & jurisdiction

Any disputes arising out of or in connection with this policy, including any question regarding its existence, validity or termination, shall be subject to the exclusive jurisdiction of the courts of Malaysia.

X38 TRAVEL SOLUTIONS SDN. BHD.

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