

# **Tongcheng Travel Holdings Limited**

## **User Privacy Policy**

The User Privacy Policy will ease you into our collection, use, storage, and management of your personal information. We have expanded and refined our user privacy policy for our products and services based on this Policy and are committed to securing your personal information and taking it under control. This policy applies to Tongcheng Travel Holdings Limited and its subsidiaries and consolidated affiliated entities.

### **I. How we collect and use your personal information**

When you use our products or services, we need/may need to collect and use some of your personal information, following the principles that are reasonable, relevant and necessary to minimize the collection of your information. We collect and use two types of your personal information:

(I) Information necessary for the core business functions of our products and services: this type of information is necessary for the operation of the products and services which you must authorize us to collect. If you refuse to provide such information, we will not be able to provide you with the relevant products or services.

(II) Information that may be collected for supplementary business functions of our products and services: such information is required for non-core business functions which you may choose whether to authorize us to collect. If you refuse to provide such information, the supplementary business functions may not be available or may not achieve the results we intended, but will not affect your normal use of the core business functions.

### **II. How we use cookies and technologies of their kinds**

(I) In case you do not refuse to accept cookies, we will set or use cookies on your computer. The data information is anonymous to enable you to log in or use the services or features of the Tongcheng Travel platform that depends on cookies, so as to provide you with more considerate personalized and promotional services.

(II) You may refuse to accept cookies by modifying your browser settings; however, if you choose to refuse to accept cookies, you may not be able to log in or use the services or features of the Tongcheng Travel platform that depends on cookies.

(III) In addition to cookies, we may use such other similar technologies as web beacons and pixel tags on our website. For example, emails we send to you may contain links that lead to our website, and if clicked, we will track that click to gain a better understanding of product and service preferences so as to improve our customer service experience. A web beacon is typically a

transparent image embedded in a website or email. With pixel tags in emails, we can tell if an email has been opened. Users can unsubscribe from our mailing list at any time if they do not want their activity to be tracked in this way.

### **III. How we share, transfer, and disclose users' personal information**

We may, either expressly or with your authorization, share information of your orders, accounts, devices, and locations with third parties, such as partners, to ensure the provision of services to you. However, we will only share your personal information for lawful, legitimate, necessary, specific, and explicit purposes, and only as much as is necessary to provide the services. We will require third parties with whom we share personal information to handle such information in accordance with confidentiality and security measures not less stringent than those required by this Policy.

### **IV. How we store the user information collected**

(I) We follow the principle of keeping personal information for the shortest time necessary to achieve the purpose of processing, unless we need to extend the retention period or are permitted by law or the authorities or assist the authorities to make inquiries.

(II) If we cease to operate the products or services of Tongcheng Travel, we will promptly stop the activities of collecting your personal information, notify you of the cessation of operations in the form of individual delivery or announcement, and delete or anonymize the personal information held by us.

(III) Personal information collected and generated in our operation in the People's Republic of China is stored within China, except in the following cases: explicitly provided for by laws or regulations; with your separate consent; your personal initiative such as cross-border transactions via the Internet.

### **V. How we ensure the security of user information collected**

(I) We attach great importance to information security and have set up a special data security team, whose contact email is [anquan@ly.com](mailto:anquan@ly.com). We strive to provide you with information protection by adopting appropriate management, as well as technical and physical security measures, and by establishing an information security and assurance system that is compatible with our business development in reference to domestic and international information security standards and best practices.

(II) We have established security protection measures throughout the data lifecycle, covering collection, storage, display, processing, use, destruction, etc. We take control measures according to the level of information sensitivity, including but not limited to identity identification, SSL encrypted transmission, access control, malicious code prevention, security audit, encrypted storage by encryption algorithms with a strength of AES256 or above, desensitized display of sensitive

information, etc. We also conduct quarterly information security audits to minimize the security risks of online business to the greatest extent.

(III) We will use encryption and anonymization technologies for data security in the transmission of and storage of personal information, and isolation technology for data isolation.

(IV) We will strengthen the security capability of the software you install on your device and will constantly enhance our capabilities to identify and prevent viruses, Trojan horses and other malicious codes. We will strive to guarantee the security of the software on your device and to protect locally cached data and files by encryption through continuous improvement of our technical means.

## **VI. How you can manage your personal information**

(I) We provide convenient ways for you to access, correct and delete your account information and other personal information you provide when using our services, as required by applicable laws and regulations.

(II) You can login to "My" - "General Information" "All Orders" at any time to check and correct your account and order information, as well as modifying your personal data, privacy settings, security settings, delivery addresses and other personal information you provide when using our services. Should you have any questions, please contact our customer service at hotline: 95711.

## **VII. Protection of minors**

(I) We attach great importance to the protection of the personal information of minors. If you are a minor (a citizen of the People's Republic of China under the age of 18), you should obtain prior consent from your legal guardian before using our services. We protect the personal information and privacy of minors in accordance with the provisions of relevant laws and regulations.

(II) We do not collect personal information directly from minors. For cases where we collect personal information from minors with the consent of their parents or guardians to use our products or services, we will only use, share, transfer or disclose such information as permitted by law or regulation, with the express consent of their parents or guardians, or as necessary to protect minors.

## **VIII. Privacy Requirements for Suppliers**

(I) We also adopt strict data security management for third parties (including suppliers and other partners), such as signing relevant confidentiality agreements and data processing agreements.

(II) We keep our partners involved in data transmission under review, including checking the status of classified protection of information security certification and ISO 27001 certification, to ensure that they have the relevant qualifications for information security management.

## **IX. Revisions and updates to this privacy policy**

We may adjust and update our privacy policy as appropriate in light of specific matters such as compliance requirements of laws and regulations as updated and business content as adjusted from time to time, and will review the privacy policy on a monthly basis to ensure that we apply a privacy policy that maximizes the security of your personal information. Any change and update to this privacy policy will be posted on the official website of Tongcheng Travel.

#### **X. Contact us**

Your opinion values to us. If you have any other complaints, suggestions, issues related to personal information of minors, or any questions, comments or suggestions on the content of this Policy, please feel free to contact us. You can contact us by visiting our online customer service system, or by sending an email to our personal information protection officer, or by calling our customer service at hotline: 95711.