

Affinion International Privacy and Cookies Policy

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Affinion International Limited ("Affinion", "We", "us", "our") respects your privacy and is committed to protecting your personal data. This privacy and cookies policy will inform you as to how we look after your personal data when you visit our website or use our service (regardless of where you visit/use it from) and tell you about your privacy rights and how the law protects you.

This privacy and cookies policy is provided in a layered format so you can click through to the specific areas set out below.

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1. About Affinion and this Privacy and Cookies Policy

Affinion are committed to protecting and respecting your privacy. We want you to know how and why we use any personal data we collect from you, hold about you, you provide to us, or we otherwise process. This Privacy and Cookies Policy will also explain the choices you have available to you about your data. In providing your data to us or using our services or our websites you agree to this Policy and accept the practices outlined in this Policy.

“Personal data” and “your data” mean any information about you which is personally identifiable or can be related back to you such as your name, date of birth, credit or debit card numbers, address, telephone number, email address, marketing preferences, service selections and queries.

This Policy covers the provision of all our consumer services, our websites and our interactions with you. These include any services that you enrol in or otherwise subscribe to.

Affinion is the data controller for any data we collect directly from you. If you have a concern about your data or a question about this Policy for our Data Protection Officer, please contact them by email at dpo@affinioninternational.com.

2. Data we collect

Affinion collects and uses your data for the purpose of providing you with the product you have signed up to and/or the service you have access to whilst ensuring you have a great and enjoyable experience.

You provide some of this data directly when you sign up/use the product/service, via the telephone when you call our customer service teams for support and when you communicate with us in writing by email or post.

It is up to you what data we collect and you may decline to provide us with your data. However, if you choose not to provide us with your data which is necessary to provide you with the product/service, you will not be able to use that product/service.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests (Legitimate Business Purpose).
- Where we need to comply with a legal or regulatory obligation.
- Where you have provided your consent.

2.1 How we use your data

The data we collect will depend on the type of product/service you sign up to and the features you use, your interactions with us, whether you are paying us for the service or receiving the service through a package offered by one of our partners and the preferences you select. The data we collect includes the following:

- **Name and contact data** necessary to authenticate your identity, register you to receive the relevant services including, where applicable, co-ordinating with other partners or relevant third parties to provide such services and the day to day servicing of your membership. Without it, we will not be able to sign you up and/or provide you access to use the product or service. In addition, this data is necessary to detect and if necessary withhold you from re-enrolling in a product/service where your membership/policy was terminated due to a breach of terms of use such as misuse of the product/service or fraudulent activity. The specific legal ground we are processing your personal data on is under performance of a contract with you.
 - The type of data we would collect include first name and last name, postal address, email address, telephone/mobile number, date of birth and other similar contact data.
 - Partners and relevant third parties include credit reference agencies, financial institutions such as your bank, travel related organisations such as airlines, hotels, cruise organisers, providers of airport parking/lounge services, ticketing organisations and the partner you used to sign up to the product/service.
 - Day to day servicing of your membership includes communications about order confirmations, benefit reminders associated with your product/service, renewal notice/expiry notice, payment issues and maintenance issues.
- **Payment data** necessary in order to process your payment for the product/service you have signed up for and/or have access to. Without it, we will not be able to enrol you and/or provide you access to use the product or service. In addition, this data is necessary to detect and if necessary withhold you from re-enrolling in a product/service where your membership/policy was terminated due to a breach of terms of use such as misuse of the product/service or fraudulent activity. The specific legal ground we are processing your personal data on is under performance of a contract with you.
 - This may include credit or debit card numbers, expiry date and the associated security code. We will not store your associated security code (CVV) so you will have to re-enter this for any future transactions.
- **Feedback data** where we will process your data for certain [legitimate business purposes](#) to improve our products and services for your continued enjoyment and to assist in the development of new products and services based on your feedback.
 - This may be through comments and reviews you have left for the product/service, surveys, updates to your information such as the way you prefer to be contacted, or through the questions and information you provide to our customer service desk whether through phone or email.
 - We may also use your data to conduct market research by asking you to participate in a survey about topical issues, conducted by us, our partners or third parties. If you receive a survey from us, we will always tell you how any information you provide in the survey will be used. If you receive a survey from our partner or selected third party, please read their privacy notice/policy before submitting any of your data.
 - Participation in surveys is voluntary and it is up to you whether to take part.
- **Demographic data** necessary to ensure you are old enough to use the product/service and in a country where we offer the product/service. Without it, we will not be able to sign you up and/or provide you access to use the product or service. There may be instances where demographic data is optional and this will be made clear to you if we ask for this data. If it is optional, and you have provided us with such data, we will process it in order to provide

you with information about your product/service such as price changes due to your age or location or to send you notifications if you are using the product/service whilst in a different country.

- This may include your age, country or gender.

- **Data about Children** only when it is necessary for the product/service and you have provided it to us. This data will not be used for any other purpose other than to provide you the full benefit of the product/service such as the protection of your child's bank card, cover for your child under insurance products or for travel services such as flights, hotels or cruises. Our products are services and not available to be taken out by persons under the age of 18. The specific legal ground we are processing your personal data on is under performance of a contract with you.
- **Call recording data** where we may collect your data if we record or monitor calls by you to our customer service desks. We will process your data for [legitimate business purposes](#) namely quality assurance and training purposes and to ensure we have collected and recorded any consent you provide over the phone. We will always inform you if such recording or monitoring is taking place.
- **Anonymised data and Aggregated data** – anonymisation is the process of converting personal data to anonymised data so that it does not identify you or any individual and will not allow you or any individual to be identified through its combination with other data. We collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but it is not considered personal data in law as this data does not directly or indirectly reveal your identity. In addition to the way we process your data explained above, we will use anonymised data and aggregated data to improve the quality of our existing products/services, develop new features, products/services and for overall research purposes. An example would be where we aggregate your data on how often you use the product/service to calculate the percentage of users accessing a specific website feature. As this data is anonymised and does not identify you, we may share this data with Affinion controlled affiliates, subsidiaries and our parent company as well as third parties and partners. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We will also use your data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you. You will receive marketing communications from us about similar products and services if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing by clicking the unsubscribe link in the email or SMS.

2.2 Data where we need your consent

We will ask you for your express opt-in consent before we share your personal data with any company outside Affinion controlled affiliates, subsidiaries and our parent company for marketing purposes. We will provide you with more information about the categories of these companies at the time of asking you for your express opt-in consent. This will typically be for products/services offered by other companies which may be of interest to you based on the product/service you have with us or may be for another purpose which will also be made clear to you at the time of obtaining your express opt-in consent.

We will also ask you for your express opt-in consent before we send you marketing communications about our products/services that are not similar to what you currently have with us.

If you provide your explicit opt-in consent to receive such marketing communications, we may provide you with further options where you can choose how to receive it, such as email, SMS, physical mail or telephone and the frequency of such marketing communications. If you have provided your explicit consent to receive marketing communications but later change your mind, you can edit your preferences on how you receive them, how often you receive them or even stop receiving them altogether. To find out how to do this, please click [here](#).

2.3 Processing for Legitimate Business Purposes

We explain throughout the Policy when and why we process your data for a legitimate business purpose. A legitimate business purposes means the interests of Affinion in conducting and managing our business to enable us to give you the best products and services and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You have the right to object to this processing if you wish and if you wish to do so please contact our [Data Protection Officer](#). If you do object, this may affect our ability to carry out the tasks for your benefit where we are processing your data for a legitimate business purpose.

3. Why we share your data

We may share your data if it is necessary to do so in order to provide you with your product/service, if we have a [legitimate business purpose](#) for doing so, or if you have given us your explicit consent to do this.

Please note that when you are redirected to a partner or third party website from our website or service, if you provide personal data to any of those partners or third parties, your data will be governed by their privacy statement/policy. You should read their privacy statement/policy before you submit any of your data to their websites.

3.1 Sharing your data with partners and selected third parties

The entities we will share your data with include selected third parties such as your bank, credit card provider, credit agencies, insurers so they can process your payment or provide other financial services (i.e. fraud prevention), ticketing organisations or travel related organisations such as airlines, hotels, cruise organisers or providers of airport parking/lounge services. We will share your data with partners to enable us to provide you with the product/service in connection with purchases you have made with that partner (i.e. the provider you have booked your event tickets with, the online retailer you have made a purchase from, the marketing partner or other partner that signed you up to our product/service or any other partner relevant to your product/service).

Additionally, third party providers of information security services will have access to your data for the purposes of monitoring our networks and websites to help keep your data secure. This processing is undertaken for legitimate business purposes.

3.2 Sharing your data within the Affinion Group

We may share your data among Affinion controlled affiliates, subsidiaries and our parent company throughout the world who are acting as our data processor and only processing your data according to our instructions for [legitimate business purposes](#). If you would like to see an up to date list of these companies, please click [here](#). We will do this in order to process transactions and ensure you are able to use the product/service. Your data is still protected in the same manner as set out in this Policy in line with applicable laws. Click [here](#) to understand our position on the transfer of data outside of the European Economic Area.

3.3 Sharing your data with others

We may also share your data with others, such as advertisers interested in advertising on the Affinion websites but only in aggregate, anonymous form, which means that the shared information will not contain nor be linked to any personally identifiable information about you or any other person.

We may ask your card issuer to update us with any changes to the information they have provided to us, for example, by providing us with any updated or a new card numbers or expiry dates. This is necessary to ensure a smooth transition for your continued enjoyment of the product/service especially for products/services where you receive cyber security and fraud detection services.

3.4 Sharing your data for compliance purposes

Additionally we reserve the right to access and disclose your information in order to comply with applicable laws, to comply with lawful requests from governments, law enforcement agencies or parties whose request we reasonably consider to be justified in connection with any allegations by any party about your abuse of our services, to operate our systems properly or to protect ourselves or our users from any of the scenarios mentioned in this section This includes protecting the rights of Affinion through the enforcement of the terms governing the product/service and protecting our customers from spam or activity which may defraud users of our product/service.

4. Cookies and Automatic Information

This section of the Policy sets out how we use cookies and similar technologies (“cookies”) on and in connection with the services on this site. Cookies are text files containing small amounts of information which are downloaded by your internet browser and stored on your PC/Mac or other device when you visit a website.

4.1 How we use information we collect through cookies

We store information that we collect through cookies, log files, clear gifs, and/or third party sources to create a summary of your preferences. We tie your personally identifiable data, and/or your membership usage history in order to provide tailored promotions and marketing offers, to improve the content of the site for you and/or to determine your preferences. We may match information collected from you through different means or at different times, including, for example, information collected online and offline, and use such information along with information obtained from other sources, including third parties. To do this, it is often necessary to share this information with carefully selected vendors and partners we work with, such as companies that perform marketing services and other business operations for us.

4.2 More information about cookies

We use strictly necessary cookies – these cookies are essential, as they enable you to move around our website and use its features. Without these cookies, services you’ve asked for (such as completing an application form or logging into a secure area of our website) can’t be provided.

In particular, we use session and persistent cookies on this site. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies and reject

persistent and session cookies by following the directions provided in your Internet browser's "help" file or by visiting www.allaboutcookies.org. If you reject persistent or session cookies, you may still use our site, but you may not be able to access all the site's functionality or your access may be limited.

We are continually looking to adopt and implement new practices and technologies in order that we may improve your user experience. We may update this Cookies Policy from time to time with details of new cookies.

4.3 How we use cookies

We use cookies to:

- remember choices you have made and personalise your use of the site;
- store your password(s) for and keep you logged into the site so that you don't have to enter passwords more than once per visit;
- remember and recognise you on subsequent visits to the site;
- identify how you use this site, including tracking how you use the site, such as information on where you came from, what content you viewed on the site, and the duration of your visit;
- deliver content and advertising more relevant to you and your interests. This allows us to serve you more relevant content and advertising when you use our products and services and not to serve you content or offers you may already have opted-out of. This includes cookies used by advertising networks, which may be subject to a separate privacy policy on how the advertising network uses information they collect. Please see the [How we use third party cookies for advertising and re-targeting purposes](#) below for further information. We link the information we obtain from or store in cookies to any data we gather about you (see [How we use information we collect through cookies](#) above).

4.4 How we use third party cookies for advertising and re-targeting purposes

We may also use cookies to enable the use of advertising technology to serve you advertisements that we feel may be relevant to you when you visit search engines, our site and/or third party sites upon which we advertise. This technology uses information about your previous visits to our site and the third party sites upon which we advertise to tailor advertising to you. In the course of serving these advertisements, a unique third-party cookie may be placed or recognised on your browser to enable us to recognise you.

4.5 Google Analytics

This site also uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyse how visitors use the site. Information about your use of this site (including your IP address) will be transmitted to and stored by Google on servers in the US, and Google will use this information to evaluate your use of the site, compile reports on website activity for us, and provide other services relating to website activity and internet usage, but will not associate your IP address with any other data held by Google. For more information on the use of Google Analytics visit: <http://www.google.co.uk/intl/en/analytics/privacyoverview.html>

To opt out of Google Analytics, visit <https://tools.google.com/dlpage/gaoptout?>

4.6 Web Beacons

We use web beacons, provided by our ad serving partner, to help manage our online advertising. These web beacons allow us and/or our ad serving partner to access individual cookies when a browser visits the site. This allows us to identify which advertisements or listings served by our ad serving partner bring users to our website. Web beacons are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on webpages and are about the size of the period at the end of this sentence. We link the information gathered by clear gifs to your data (see [How we use information we collect through cookies](#) above).

4.7 Logfiles and Internet Protocol (IP) Address

Like many websites, we gather certain information relating to website use automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp and clickstream data. We use this information, which does not by itself identify individual users, to analyse trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. After collection, during our processing of the data, we link this automatically-collected data to the data we hold about you.

Where you are using our websites, we may use your IP address to help diagnose problems with our server and to administer our website. Your IP address may also be used to help identify you for the duration of a session and to gather broad demographic information. Your IP address will never be linked to any personally identifiable data unless you are in the process of making a purchase, in which case the link between this information will terminate upon your final purchase.

4.8 Third party websites using Cookies

Our websites may contain links to third party websites some of which may also use cookies. This Policy does not cover third party websites which will be subject to their own privacy and cookies policies. Affinion does not have access to or control

over cookies or other features used by such sites. Please contact them directly for more information about their privacy practices.

4.9 Clickstream

As you use the internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as “clickstream data”, can be collected and stored by a website’s server. Clickstream data can tell us the type of computer and browsing software you use, the address of the website from which you linked to our website, and, in some instances, your e-mail address. We may use clickstream data to determine how much time visitors spend on each page of our site, how visitors navigate throughout the site and how we may tailor our web pages to better meet the needs of visitors. This information will only be used to improve our websites. Any collection or use of clickstream data will be anonymous and aggregated and will not contain any of your identifiable data except where you have selected an email address that identifies your name.

5. Your Rights

5.1 Right to rectification

You can update and amend your data held by us if inaccurate or incomplete by letting us know via the Contact Us section on the Membership Services website.

5.2 Right of access, restriction of processing and erasure

If you would like to see the data we process on you, restrict the processing of your data or have it deleted you can contact our [Data Protection Officer](#) who will investigate the matter and take you through the necessary steps to provide you with the data you requested or to delete it. If you would like it deleted, in particular any data which is necessary for us to process to provide you with the product/service, you will no longer be able to use the product/service. If applicable, our [Data Protection Officer](#) will explain any circumstances where we are not be able to erase your data such as the exercise or defence of a legal claim and situations where you can restrict the processing of your data. Our [Data Protection Officer](#) will respond to your query within 30 days of receiving your request.

5.3 Right to object

You can edit or remove your information from our marketing database by emailing, writing or calling us using the contact details above, specifying your name, the email or other address/ telephone number you used to register with us and, if referring to a web registration, your user name in the email. You may also do this online if you have an online account by visiting your preferences page.

In addition, if you have provided us with your explicit consent to receive marketing communications via email, you will normally find an unsubscribe link at the bottom of the marketing emails you receive, which you can use to tell us if you no longer wish to receive marketing communications from that source.

If you object to us processing your data based on a [legitimate business purpose](#), please contact our [Data Protection Officer](#) who will investigate and take action on the matter.

6. Security

Securing your personal and non-personal information is very important to us. All customer databases are held in a secure environment and (except for law enforcement authorities in limited circumstances), only those Affinion employees or other persons who need access to your data in order to perform their duties are allowed such access. Any of these employees or persons who violate our privacy and/or security policies may be subject to disciplinary action, including possible termination and civil and/or criminal prosecution. Where you are using our websites, we take proactive steps to put safeguards in place to provide for the secure transmission of your data from your computer to our servers. However, due to the inherent open nature of the Internet, we cannot guarantee that communications between you and Affinion, and Affinion and you, will be free from unauthorised access by third parties, such as hackers. We have implemented all necessary and reasonable technical and organisational measures to protect your data including:

- data minimisation and encryption of personal data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

Our websites utilise Standard SSL encryption on pages where secure information is transmitted over the Internet. We also use Verisign as our Certificate of Authority. If you would like more information on our Verisign Certificate, please visit <https://www.verisign.com/?dmn=verisign.co.uk>

7. Other important information

7.1 Updates to this Policy

We may update this Policy when necessary to reflect changes in our products/services. Please check the last updated date at the top of this Policy to ensure you are reviewing our most current version and understand how we protect your data. If there are any material changes to this Policy which change the way we collect and use your personal data, we will let you know by either posting on this website a notice of the changes we are making before they take effect or by sending you a notification.

7.2 Transfers

As part of the services offered to you, for example through our website, the information you provide to us will be transferred to and processed in countries inside and outside of the European Economic Area (EEA) in particular to the US for the purposes of payment processing, ad hoc application maintenance and systems support. If we transfer or store your personal data outside the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the Data Protection Act 2018 and EU General Data Protection Regulation. If you use our service while you are outside the EEA, your personal data may be transferred outside the EEA in order to provide you with these services. Where you have used our services to make travel arrangements such as booking flights, hotels or cruises, your data will be transferred to the third party in the country where you have made the arrangements.

Whenever we process or transfer your personal data out of the EEA, we always ensure that an adequate level of protection is afforded to it. It is the case for example when we process or transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission (to see the list, please visit: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm). Whenever our affiliates or providers based in the US process your data, we include relevant mechanisms (such as standard contractual clauses approved by the European Commission, so-called EC model clauses) in contracts and agreements with them and/or rely on the EU-US Privacy Shield framework when our affiliate or provider is Privacy Shield certified to ensure that any processing of your data is in accordance with Privacy Shield obligations, namely : Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access and Recourse; and Enforcement and Liability. If you would like to know more about our parent company's privacy policy and privacy shield certification, please visit: <http://www.privacyshield.gov> or contact our [Data Protection Officer](#). When providers or affiliates based in other countries that have not been deemed to provide an adequate level of protection for personal data by the European Commission process your data, we always use EC model clauses in contracts and agreements with them to maintain a similar level of protection as if your data was processed within the EEA.

You can contact our [Data Protection Officer](#) if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7.3 Retention

We retain your data for as long as you continue to use the product/service for the purposes explained in [Section 2](#) above. When you cease your membership of the product/service, we will retain your data for as long as necessary to comply with our legal obligations, to resolve disputes and defend claims, as well as, for any additional purpose based on the choices you have made such as to receive marketing communications that you provided your consent to. In particular, we will retain call recordings, the data you supplied when joining the product, including complaints, claims (for insurance products) and any other data you supplied during the duration of your contract with us for your product/service for a period of 7 years from termination or expiry of your service in line with industry standards and UK statutory limitation periods for the defence of contractual claims.

7.4 Contact

If you have a concern about your data or a question about this Policy for our Data Protection Officer, please contact them by email at dpo@affinioninternational.com. If you are not happy with the response you received or believe your data has not been used in accordance with this policy and therefore not processed in line with applicable laws, you may lodge a complaint with the Information Commissioner's Office (ICO), the UK Supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

For any other query, you can reach us via the Contact Us section on the Membership Services website.

