



## Privacy Shield Policy

ATPI Limited (Trading as ATPI) complies with the EU-US Privacy Shield Framework, the Swiss-US. Privacy Shield Framework, and the new EU-US. Data Privacy Framework as set forth by the United States Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States respectively.

ATPI has certified to the department of Commerce that it adheres to the Privacy Shield principles. If there is any conflict between the terms in the Privacy Policy and the Privacy Shield Principles, the Privacy Shield principles shall govern. ATPI's Privacy Shield joint certification covers until 21 November 2023. To learn more about the Privacy Shield program, and to view our certification please visit <https://www.dataprivacyframework.gov>

The legal entities included in this registration are:

ATPI Limited

Griffin Americas Inc - 7770305

Global Transportation Group LLC (Trading as Griffin Americas) -  
801202157

Instone International Holdings Inc -4025041

Instone (USA) International LLC - 844059

ATP USA Inc — 4025041

In compliance with the Privacy Shield Principles, ATPI commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact ATPI as below:

Nikki Matthews, General Counsel

ATPI, The Royals, 353 Altrincham Road, Manchester, M22 4BJ, UK

E-mail: [legal@atpi.com](mailto:legal@atpi.com)

ATPI has further committed to refer unresolved Privacy Shield complaints to the JAMS alternative dispute resolution (ADR) service, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction. please visit <https://www.jamsadr.com/> for more information or to file a complaint. The services of JAMS are provided at no cost to you. In addition, there is also the possibility, under certain conditions, for you to invoke binding arbitration.

ATPI only receives personal Data for the purpose of arranging travel related services and will not use the data for any other purpose. The types of personal Data collected may

include mandatory items such as Passport Data, Contact Information, and methods of payment. This list is not exhaustive. That personal Data will at all times be kept secure, and ATPI will take all reasonable and appropriate measures to protect it from loss, misuse and unauthorised access, disclosure, alteration and destruction.

Any contact with ATPI regarding matters relating to the processing of personal Data under the Shield must be directed in writing to:

Nikki Matthews, General Counsel  
ATPI, The Royals, 353 Altrincham Road, Manchester, M22 4BJ, UK  
E-mail: [legal@atpi.com](mailto:legal@atpi.com)

Personal Data will only be onward transferred to 3<sup>rd</sup> parties who are directly involved in the fulfilment of travel arrangements for our travellers, and for the specific purpose only.

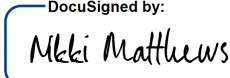
These will include (but not limited to) Airlines, Hotels, and Global distribution systems. This Data will be kept securely by the 3<sup>rd</sup> party. ATPI commits to fully comply and be liable with the Accountability for Onward Transfer' Principle in the Shield in as far as the personal Data transfers applies.

Individuals have the right of access to their own personal Data with the ability to have that data corrected or deleted or limiting its use or its disclosure. An individual may also elect not to have their personal Data transferred to one or more 3<sup>rd</sup> parties, or processed for a specific purpose, but it may severely limit or prevent travel arrangements being made on their behalf in such a circumstance. That application must be made in writing to the address above.

ATPI acknowledges the investigatory and enforcement powers of the Federal Trade Commission, or any other US authorized statutory body in relation to the Shield, and the requirement to disclose personal Data in response to a lawful request by any public authority, or to meet National Security or law enforcement requirements in the United States. ATPI commits to making public any order from the FTC or a court relating to any Non-Conformance to the Principles of the Shield.

ATPI will conduct Internal Audits to ensure that the Policy Statements made above remain true and accurate, and that they have been implemented in accordance with the Privacy Shield principles.

Signed

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Nikki Matthews  
**General Counsel**  
October 2023