

Global Gulls Privacy Policy

Effective Date: June 1st, 2025

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1. Introduction

- **1.1. Welcome to Global Gulls**

This Privacy Policy applies to Global Gulls ("Global Gulls," "we," "us," or "our"). Global Gulls is an independent travel agency committed to protecting the privacy and security of the personal information entrusted to us by our clients.

- **1.2. Purpose of This Privacy Policy**

This Privacy Policy ("Policy") explains how Global Gulls collects, uses, shares, secures, and otherwise processes your personal information when you inquire about or use our travel planning, consultation, and booking services (collectively, the "Services"), or interact with our website (if applicable). We are committed to transparency and ensuring you are informed about our data practices and your rights concerning your personal information.

- **1.3. Scope and Acceptance**

This Policy applies to personal information provided by you, the client or user ("you," "your," or "traveler"), and any other individuals, including children, on whose behalf you are making travel arrangements ("Other Travelers"). By requesting or using our Services, making inquiries, effecting a booking through us, or using our website, you acknowledge that you have read and understood this Privacy Policy and agree to its terms. If you provide information on behalf of Other Travelers, you confirm that you have the authority to do so and have obtained their consent for us to process their personal information in accordance with this Policy. This Policy should be read in conjunction with our Terms of Service, which also govern your use of our Services. The effective date of this Policy aligns with our Terms of Service to ensure clarity regarding the terms applicable at the time of your engagement with us.

- **1.4. Definitions**

For the purposes of this Policy, the following terms shall have the meanings ascribed to them below:

- **Personal Information:** Any information relating to an identified or identifiable natural person. This may include, but is not limited to, names, contact details, identification numbers, payment information, and travel preferences.
- **Sensitive Personal Information:** A subset of Personal Information that is subject to heightened protection under certain laws, such as health data, passport details in some contexts, or information revealing racial or ethnic origin, religious beliefs, or biometric data.
- **Processing:** Any operation or set of operations performed on Personal

Information, such as collection, recording, organization, storage, adaptation, retrieval, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure, or destruction.

- **Travel Suppliers ("Suppliers"):** Third-party providers of travel-related products and services, including but not limited to airlines, hotels, cruise lines, tour operators, car rental companies, and travel insurance providers.
- **Host Agency:** The agency with which Global Gulls is affiliated, identified as Outside Agents (FST No. ST15578, CST No. 2090937-50), which provides access to certain supplier relationships, accreditations, and administrative support.
- **CRM Provider:** The provider of our Customer Relationship Management system, TESS by Travel eSolutions, used for managing client information and bookings.

2. Information We Collect

Global Gulls collects Personal Information that is necessary to provide you with our comprehensive travel Services, manage our client relationships effectively, and for other legitimate business purposes. The collection of specific data points, particularly those deemed sensitive, is handled with utmost care and for explicit, limited purposes.

- **2.1. Categories of Personal Information**

We collect various categories of Personal Information, which are detailed in the table below. The provision of information about Other Travelers implies that you have obtained their consent for sharing their data with us for the purposes outlined.

Table 1: Categories of Personal Information We Collect

Category of Personal Information	Examples of Data Points	Primary Source(s)
Identity & Contact Information	Full legal names (as on government ID), dates of birth, gender, postal addresses, email addresses, phone numbers.	Directly from you; From the lead traveler in your party.
Travel Documentation Information	Passport details (number, issuance/expiry dates, country of issuance), visa information (if applicable), Known Traveler Number, redress numbers, driver's license details (for car rentals).	Directly from you; From the lead traveler in your party.
Payment Information	Credit/debit card details (number, expiry date, CVV – transmitted to Suppliers for processing), billing address, bank account details (for specific Supplier payments or	Directly from you; From the lead traveler in your party.

	refunds).	
Travel Preferences & Booking Details	Trip details (destinations, dates), flight/hotel/cruise/car rental/tour preferences and bookings, loyalty program numbers (airline, hotel, car), seating/meal preferences, accommodation requests, travel history.	Directly from you; From the lead traveler in your party.
Sensitive Personal Information	Health-related information (pre-existing medical conditions, disabilities, allergies, mobility limitations, dietary restrictions indicating health conditions or religious beliefs), special needs information.	Directly from you (with your explicit consent); From the lead traveler in your party.
Communications Data	Records of emails, notes from phone calls (if any), messages exchanged via our CRM system (TESS).	Directly from you; Generated during our interactions.
Technical Data (if website is used)	IP address, browser type, operating system, referring URLs, pages visited on our website, time spent, clickstream data.	Automatically from your device when you use our website (if applicable).
Information about Children	Names, dates of birth, passport details of children traveling in your party.	From the parent or legal guardian making the booking.

The collection of "any other information reasonably required by Global Gulls or its Suppliers," as mentioned in our Terms of Service [3], will always be guided by the principle of data minimization, ensuring we only request what is genuinely necessary to plan and book your travel or fulfill legal requirements.[4] For Sensitive Personal Information, such as health-related data provided to accommodate special needs [3], we collect this only with your explicit consent and strictly for the purpose of arranging suitable and safe travel. This careful approach is essential as the travel industry inherently handles such sensitive data.[5]

- **2.2. How We Collect Your Information** We collect Personal Information through

various means:

- **Directly from You:** When you make an inquiry, request a quote, make a booking, complete forms (online or offline), subscribe to newsletters (if any), or communicate with us via email, telephone, or through our CRM system (TESS).
- **From the Lead Traveler:** If you are making travel arrangements for Other Travelers in your party, we collect their Personal Information from you. By providing this information, you confirm you have their consent to do so and to our processing of their data as described in this Policy.
- **Automatically (if you use our website):** If Global Gulls operates a website, we may collect certain technical information automatically through cookies and other tracking technologies. Details regarding such collection will be provided in the "Cookies and Tracking Technologies" section of this Policy (Section 5).
- **From Third Parties:**
 - **Travel Suppliers:** We may receive information from Suppliers regarding your booking, such as confirmations, schedule changes, or updates relevant to your travel arrangements.

3. How We Use Your Personal Information

Global Gulls uses your Personal Information for legitimate business purposes, primarily to deliver the travel Services you request and to manage our relationship with you effectively. The use of a Customer Relationship Management (CRM) system, TESS, facilitates many of these processes, enabling efficient management of client details, trip planning, and communications.

Our primary purposes for using your Personal Information include:

- **Providing Travel Services:** This is the core of our operations and includes researching and planning itineraries, providing travel consultations, making bookings with Travel Suppliers (such as airlines, hotels, cruise lines, tour operators, car rental companies, and travel insurance providers), issuing necessary travel documentation, and facilitating payments to these Suppliers.
- **Client Communication and Support:** We use your contact information to respond to your inquiries, provide travel quotes, send booking confirmations, itinerary details, and important pre-trip information. We also communicate with you regarding any changes or updates to your travel plans, provide support during your travels if needed, address any issues or complaints, and may request feedback post-trip to improve our Services.
- **Managing Your Account and Relationship:** We maintain records of your interactions and transactions with us, primarily within our TESS CRM system, to ensure continuity of service and for our internal administrative purposes.
- **Personalization (with consent where required):** Where you have indicated preferences or based on your past travel history with us, we may tailor our travel recommendations to better suit your interests.
- **Marketing and Promotions (with your explicit consent):** If you have opted-in to receive such communications, we may send you newsletters, information about special offers, new travel products or services, or other information we believe may be of

interest to you. We will always provide a clear and easy way for you to opt-out of receiving these communications at any time.

- **Business Operations and Improvement:** For internal record-keeping, accounting, financial reporting (including commission tracking facilitated by TESS), and analyzing the usage of our Services to understand client needs better and to enhance our offerings.
- **Legal, Regulatory, and Contractual Obligations:** To comply with applicable laws, regulations, legal processes (such as court orders or subpoenas), or governmental requests. We also use your information to enforce our Terms of Service and other agreements, and to protect the rights, privacy, safety, or property of Global Gulls, our clients, or others.
- **Health, Safety, and Security:** To communicate essential health, safety, or security information related to your travel. If you provide Sensitive Personal Information regarding health or special needs, we use this information with your consent to arrange appropriate accommodations or services with Suppliers to ensure your well-being and safety during travel.

The justification for processing your Personal Information for these purposes is typically based on the necessity to perform our contractual obligations to you (i.e., to provide the travel Services you've requested), our legitimate business interests in operating and improving our agency, compliance with legal obligations, or, particularly for marketing activities and the processing of Sensitive Personal Information, your explicit consent.

4. How We Share Your Personal Information

Global Gulls does not sell your Personal Information. We share your Personal Information with third parties only in the circumstances described in this Policy, as necessary to provide our Services, with your consent, or as required or permitted by law. Our sharing practices are designed to ensure your travel arrangements are fulfilled efficiently and your data is handled responsibly.

The categories of third parties with whom we may share your Personal Information are detailed below:

Table 2: How and Why We Share Your Personal Information

Category of Recipient	Examples of Who They Are	Why We Share Information With Them	Key Types of Information Shared
Travel Suppliers	Airlines, hotels, cruise lines, tour operators, car rental companies, activity providers, travel insurance providers.	To research, quote, book, and fulfill your travel arrangements and any related services you request. These Suppliers become independent controllers of your data.	Name, contact details, dates of birth, gender, passport information, visa details, payment information (as needed for booking), travel preferences, loyalty numbers, special needs (with consent).

Our CRM Provider (TESS by Travel eSolutions)	Travel eSolutions, LLC.	To manage your client profile, booking details, communications, and other agency operational functions efficiently. TESS acts as a data processor on our behalf.	All client profile information, booking details, communication records, payment transaction records (if managed via CRM), preferences, and any data entered into the CRM.
Our Host Agency (Outside Agents)	Outside Agents (FST No. ST15578, CST No. 2090937-50).	For administrative support, access to supplier agreements and booking systems, commission processing, and potentially for compliance and regulatory oversight.	Client name, booking details, commissionable amounts, and other information necessary for the host agency to provide its support services to Global Gulls and fulfill its own operational/regulatory requirements.
Payment Processors	Third-party payment gateways or financial institutions.	To process payments for our Service Fees (if any, as distinct from Supplier charges) or to facilitate payments to or refunds from Suppliers.	Credit/debit card details, billing address, transaction amounts.
Other Service Providers	IT support providers, marketing platform providers (for newsletters, with your consent), accounting services, legal advisors.	To assist us in operating our business, providing technical support, marketing our services, or fulfilling professional advisory needs.	Dependent on the service: e.g., contact information for marketing, financial data for accounting, system access for IT support. All under confidentiality obligations.
Government Authorities and Legal Requirements	Law enforcement agencies, courts, regulatory bodies, customs and immigration authorities.	To comply with applicable laws, regulations, subpoenas, court orders, or other legal processes; to respond	As legally required or mandated, which may include any Personal Information we hold.

		to governmental requests; to protect our legal rights.	
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When we share your Personal Information with Travel Suppliers, they will process it according to their own privacy policies and data protection practices, as they are providing services directly to you. We encourage you to review their policies. For our direct service providers, such as TESS and Outside Agents (when acting on our behalf for administrative support), we take steps to ensure they are committed to protecting your data and are typically bound by contractual obligations regarding data confidentiality and security. The fundamental reason for most data sharing is its necessity for the provision of the travel Services you have requested from Global Gulls.

5. Cookies and Tracking Technologies

This section describes our use of cookies and similar tracking technologies if Global Gulls operates a website. Cookies are small text files placed on your device when you visit a website, and they serve various functions, from enabling basic site functionality to helping analyze site usage and personalizing content.

- **Current Status:**
 - Global Gulls primarily provides Services through direct communication (email, phone) and does not currently operate a website that utilizes cookies or other online tracking technologies directly. Should we launch a website or implement such technologies in the future, this Privacy Policy will be updated accordingly to provide detailed information about their use and your choices.
- **Third-Party Cookies:**

Please note that third parties (including, for example, recaptcha by Google and providers of external services like social media plugins) may also use cookies, over which we have no direct control. These cookies are likely to be analytical/performance cookies or targeting cookies. If Global Gulls utilizes website templates or booking engine integrations provided by our Host Agency, Outside Agents, some cookies present on our site may be determined or managed by them. We will endeavor to provide information on significant third-party cookies.
- **Your Choices Regarding Cookies:**

You can typically manage or disable cookies through your internet browser settings. Most browsers allow you to refuse all cookies, accept only certain cookies, or delete cookies that have already been set. Please refer to your browser's "help" section for instructions. Please note that if you choose to block or delete cookies, some parts of our website may not function properly.

It is advisable, even for a new agency, to consider these provisions, as a website is a common business tool. Having a foundational statement demonstrates foresight and a commitment to

transparency should a website be launched or enhanced.

6. Data Security

Global Gulls is committed to protecting the security of your Personal Information. We implement reasonable and appropriate administrative, technical, and physical safeguards designed to protect the Personal Information we collect and process from unauthorized access, use, disclosure, alteration, or destruction.

Our security measures include, but are not limited to:

- **Secure Systems and Technologies:**
 - Utilization of a secure Customer Relationship Management (CRM) system, TESS by Travel eSolutions, which incorporates security features for data management and, where applicable, a secure client portal for accessing trip details.
 - Secure transmission of sensitive information, such as payment details, to Travel Suppliers, typically using encryption technologies like Secure Socket Layer (SSL) or Transport Layer Security (TLS) when data is transmitted online.
- **Access Controls:** Limiting access to Personal Information to authorized personnel (including any employees or contractors, if applicable) who have a legitimate business need to access it to perform their duties. Role-based access controls may be implemented where feasible.
- **Confidentiality Obligations:** Ensuring that any individuals with access to Personal Information are subject to confidentiality obligations.
- **Secure Storage:** Storing Personal Information on secure servers or within secure platforms, such as TESS, or systems managed by our Host Agency, Outside Agents, which are stated to have security measures in place. This includes safeguards for both digital and any necessary physical records.
- **Vendor Due Diligence:** Taking reasonable steps to select and retain service providers (such as our CRM provider and Host Agency) that are capable of maintaining appropriate security measures to protect Personal Information.
- **Employee Training and Awareness (if applicable):** Providing training to any employees or personnel on data privacy principles and security best practices to ensure they understand their responsibilities in protecting client data. For an independent contractor, this involves staying informed about data protection obligations.
- **Handling of Sensitive Information:** Applying enhanced security measures for Sensitive Personal Information, such as passport details and health-related data, including stricter access controls and encryption where appropriate.

While we strive to protect your Personal Information, it is important to understand that no method of transmission over the internet or method of electronic storage is 100% secure. Therefore, we cannot guarantee its absolute security. You also play a role in protecting your information by safeguarding your passwords, email accounts, and booking details.

In the event of a data breach that is likely to result in a risk to your rights and freedoms, Global Gulls will take appropriate responsive action, including notifying you and relevant authorities, in accordance with applicable legal requirements. Our security approach acknowledges a layered responsibility, encompassing our direct practices and reliance on the security

infrastructures of our key technology partners like TESS and Outside Agents.

7. Data Retention

Global Gulls retains Personal Information only for as long as it is necessary to fulfill the purposes for which it was collected, including to provide you with our Services, and to satisfy any legal, accounting, reporting, or dispute resolution requirements. We do not keep Personal Information for longer than is necessary.

The criteria used to determine our retention periods include:

- **The duration of our relationship with you:** Information related to active clients or ongoing bookings will be retained for the period necessary to manage those services.
- **The nature and sensitivity of the Personal Information:** More sensitive data may be subject to shorter retention periods or more stringent anonymization/deletion protocols once its specific purpose is fulfilled.
- **The purposes for which the information was collected and is processed:** Data is retained as long as it serves these defined purposes.
- **Legal and regulatory obligations:** Many business records, including those related to financial transactions, bookings, and client communications, must be retained for specific periods as mandated by law (e.g., tax laws, industry-specific record-keeping requirements, statutes of limitation for potential legal claims). For example, booking and payment information may be retained for approximately 7-10 years to comply with accounting laws and to address possible claims.
- **Legitimate business needs:** This includes retaining information necessary for commission tracking, defending against potential claims, or for analytical purposes to improve our services (though data for purely analytical purposes may be anonymized or aggregated).

Examples of typical retention approaches (which Global Gulls will further refine based on specific legal and operational needs):

- **Client Booking and Itinerary Information:** Retained for a significant period (e.g., 7 to 10 years) after travel completion to address any post-trip inquiries, facilitate future bookings, handle potential claims, and comply with financial and legal record-keeping obligations.
- **Client Account Information (if inactive):** If a client has not engaged with our services for an extended period (5 years), their information may be archived, anonymized, or securely deleted, unless legal obligations require longer retention.
- **Marketing Consents and Preferences:** Retained for as long as you wish to receive marketing communications from us, or until you withdraw your consent. Records of opt-outs will be maintained to ensure compliance with your preferences.
- **Inquiries Not Resulting in Bookings:** Information from inquiries that do not lead to a booking may be retained for a shorter period (2 years) for follow-up or analytical purposes, then deleted.

Once Personal Information is no longer required for its collected purpose and there is no legal or business need to retain it, Global Gulls will securely dispose of it through methods such as permanent deletion from our systems or anonymization. The retention capabilities of our CRM system (TESS) and any systems managed by our Host Agency (Outside Agents) will also

inform our practical ability to implement these retention periods. We aim to balance the need for retaining information for legitimate purposes with the principles of data minimization.

8. Your Privacy Rights

Global Gulls respects your privacy rights and is committed to providing you with reasonable access to and control over your Personal Information that we process. Depending on your jurisdiction and applicable law (with particular consideration for standards such as those set by the California Consumer Privacy Act (CCPA) as a baseline for robust rights), you may have the following rights:

- **Right to Know/Access:** You may have the right to request information about:
 - The categories and specific pieces of Personal Information we have collected about you.
 - The categories of sources from which the Personal Information is collected.
 - The business or commercial purpose for collecting, selling (if applicable), or sharing your Personal Information.
 - The categories of third parties to whom we disclose Personal Information.
- **Right to Correction (Rectification):** You may have the right to request that we correct any inaccurate Personal Information we maintain about you.
- **Right to Deletion (Erasure):** You may have the right to request the deletion of your Personal Information that we have collected, subject to certain exceptions. For instance, we may need to retain your information to complete a transaction for which it was collected, provide a service you requested, comply with our legal obligations (such as record-keeping for financial or regulatory purposes), detect security incidents, or protect against malicious, deceptive, fraudulent, or illegal activity. Travel-related data often falls under such exceptions due to contractual and legal retention needs.
- **Right to Opt-Out of Sale or Sharing (as defined by CCPA/CPRA):** Global Gulls does not "sell" Personal Information in the traditional sense of exchanging it for monetary consideration. If our practices were to change or if "sharing" for cross-context behavioral advertising (e.g., through website cookies) were to occur, we would provide you with the right to opt-out of such activities.
- **Right to Limit Use and Disclosure of Sensitive Personal Information (as defined by CCPA/CPRA):** For Sensitive Personal Information (such as health information or precise geolocation, if collected for specific sensitive purposes), you may have the right to direct us to limit its use and disclosure to that which is necessary to perform the services or provide the goods reasonably expected by an average consumer, or for other permitted purposes.
- **Right to Non-Discrimination:** We will not discriminate against you for exercising any of your privacy rights, such as by denying you services, charging different prices, or providing a different level or quality of services.
- **Right to Data Portability:** You may have the right to request a copy of certain Personal Information we hold about you in a structured, commonly used, and machine-readable format, and to request that we transmit this data to another entity where technically feasible.

- **Right to Withdraw Consent:** Where our processing of your Personal Information is based on your consent (e.g., for sending marketing communications or processing certain Sensitive Personal Information), you have the right to withdraw your consent at any time. Withdrawal will not affect the lawfulness of processing based on consent before its withdrawal.
- **Right to Object to Processing:** In certain circumstances, you may have the right to object to our processing of your Personal Information, particularly for direct marketing purposes.
- **How to Exercise Your Rights:**
To exercise any of these rights, please contact us using the contact details provided in the "Contact Us" section (Section 13) of this Policy.
We will need to verify your identity before processing your request to protect your Personal Information and ensure the request is legitimate. This may involve asking you to provide information matching what we have on file for you.
We will respond to your request within the timeframes required by applicable law (e.g., typically within 45 days under CCPA, with a possible extension).
- **Authorized Agent (under CCPA/CPRA):**
If you are a California resident, you may designate an authorized agent to make a request on your behalf. We will require proof that you have provided the authorized agent with power of attorney or that the agent has valid written authority to submit requests on your behalf, and we may also need to verify your own identity directly with us.

Global Gulls is committed to ensuring that you can exercise your rights effectively. This requires us to have internal processes to locate and manage your data, including information held within our TESS CRM system and in coordination with our Host Agency, Outside Agents, if necessary, to fulfill your requests. Residents of other U.S. states may also have similar rights under their respective privacy laws, and we will endeavor to honor such rights in accordance with applicable legal requirements.

9. Children's Privacy

Global Gulls is committed to protecting the privacy of children. Our Services are generally intended for and directed towards adults. We do not knowingly collect Personal Information directly from children online under the age of 13 (or any other applicable age of digital consent in a relevant jurisdiction) without verifiable parental consent.

- **Collection of Children's Information for Travel Bookings:**
When we make travel arrangements for families or groups that include children, we will collect Personal Information about those children (such as their full legal name, date of birth, and, if required for travel, passport details). This information is collected from the parent, legal guardian, or lead adult traveler who is making the booking on the child's behalf.
The provision of a child's Personal Information by the parent or guardian for the purpose of a travel booking constitutes consent for us to collect and use that information for the limited purposes of arranging and fulfilling the requested travel

services (e.g., securing airline tickets, hotel accommodations, cruise passage, or other travel components).

- **Purpose of Collecting Children's Data:**

Personal Information relating to children is collected and used solely for the purpose of making and managing their travel arrangements as part of a booking made by an accompanying adult. This is often necessary to comply with requirements from Travel Suppliers (e.g., airlines requiring ages for ticketing) and border control authorities.

- **Parental Rights:**

If you are a parent or legal guardian and believe that we may have inadvertently collected Personal Information from your child directly online without your consent, or if you wish to review, request deletion of, or refuse further collection or use of your child's Personal Information that you have provided for a booking, please contact us. While the direct online collection provisions of the Children's Online Privacy Protection Act (COPPA) 23 may not be directly applicable to our general service model where data is provided by adults, we respect the principles of parental control over children's data.

- **Parental Consent for Travel Documentation:**

We understand that airlines, cruise lines, and governmental authorities (such as customs and immigration) often have specific requirements for documentation and consent letters when children are traveling internationally, alone, with only one parent, or with an adult who is not their parent or legal guardian. While advising on or facilitating the acquisition of such documents is part of our service, the responsibility for obtaining these necessary travel consents rests with the parent(s) or legal guardian(s). The collection of a child's Personal Information by us is often essential to ensure that bookings align with these travel documentation requirements.

- **Data Sharing and Security for Children's Information:**

Personal Information of children is shared with Travel Suppliers for the same purposes and under the same conditions as adult traveler data – that is, to facilitate their travel bookings. We apply the same security measures to protect children's Personal Information as we do for all other client data, as outlined in the "Data Security" section (Section 6) of this Policy.

10. International Data Transfers

As a travel agency facilitating worldwide travel, Global Gulls must necessarily transfer your Personal Information to locations outside of your country of residence to provide our Services. This section outlines how we handle such international data transfers.

- **Acknowledgement of Transfers:**

To arrange your international travel, it is essential that we transfer your Personal Information (such as your name, contact details, passport information, booking details, and any special requirements) to Travel Suppliers (e.g., airlines, hotels, tour operators, ground handling agents) located in the countries where your travel will occur or where these Suppliers are based. These countries may have different data protection laws than those in your country of residence.

- **Basis for Transfers:**

The primary basis for these international transfers of your Personal Information to Travel Suppliers is the necessity to perform our contractual obligations to you – that is, to make and fulfill the travel bookings you have requested. Without such transfers, it would be impossible to arrange your international travel.

- **Data Processing in Various Locations:**

Your Personal Information may be processed and stored by these international Travel Suppliers in various countries around the world. Consequently, your data may become subject to the laws of those foreign jurisdictions.

- **Safeguards and Compliance:**

- We rely on our Travel Suppliers' commitments to protect your data in accordance with applicable data protection laws in their respective jurisdictions and their own privacy policies.
- When we engage other service providers (such as our CRM Provider, TESS, or our Host Agency, Outside Agents) who may process Personal Information internationally on our behalf, we seek contractual assurances that they have implemented appropriate safeguards to protect such data.
- Global Gulls is aware of and will endeavor to comply with applicable U.S. regulations concerning the transfer of sensitive Personal Data to certain countries, such as those outlined in recent U.S. Department of Justice rules. These regulations may influence our interactions with Suppliers or how data is handled for travel to or through specific regions, particularly if "bulk" transfers of sensitive data (as defined by such rules) are involved. While a new agency may not immediately meet these "bulk" thresholds, we are committed to responsible data handling in this evolving regulatory landscape.

- **For Clients in Specific Regions (e.g., European Economic Area - EEA, United Kingdom - UK):**

If Global Gulls provides services to individuals located in the EEA or UK, we will ensure that any transfers of their Personal Information outside of these regions are conducted in compliance with applicable data protection laws (such as the GDPR). This may involve relying on adequacy decisions, implementing Standard Contractual Clauses (SCCs) with relevant parties, or basing the transfer on the necessity to perform the contract you have with us for your travel arrangements or on your explicit consent for a specific booking.

By requesting international travel services from Global Gulls, you acknowledge and agree to these necessary international transfers of your Personal Information.

11. Third-Party Websites and Services

Our communications with you (such as emails or itineraries) or our website (if applicable) may contain links to third-party websites or services. These may include websites of Travel Suppliers, destination tourism boards, government travel advisory sites (such as the U.S. Department of State or the Centers for Disease Control and Prevention, as referenced in our Terms of Service), or other resources we believe may be helpful.

Please be aware that Global Gulls does not control and is not responsible for the privacy

practices, content, or security of these third-party websites or services. This Privacy Policy applies solely to information collected by Global Gulls. We encourage you to carefully review the privacy policies and terms of service of any third-party websites or services you visit before providing any Personal Information to them. Our inclusion of such links does not imply endorsement of the material on such websites or any association with their operators.

12. Changes to This Privacy Policy

Global Gulls reserves the right to amend or update this Privacy Policy at any time to reflect changes in our data practices, service offerings, legal or regulatory requirements, or for other reasons. Any modifications to this Policy will be effective immediately upon posting of the revised Policy, unless otherwise stated.

We will notify you of any material changes to this Policy by updating the "Last Updated" date at the top of this Policy. We may also endeavor to provide additional notice of significant changes, such as by posting a prominent notice on our website (if applicable) or by sending an email notification to the address we have on file for you, consistent with the notification provisions in our Terms of Service.

Your continued use of our Services after any such changes are posted will constitute your acknowledgement and acceptance of the revised Privacy Policy. We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your Personal Information. The process for updating this Policy is designed to be consistent with how our Terms of Service are modified, ensuring clarity for our clients.

13. Contact Us

If you have any questions, comments, or concerns about this Privacy Policy, our data handling practices, or if you wish to exercise any of your privacy rights, please contact Global Gulls using the following details:

- **Agency Name:** Global Gulls
- **Email Address:** contact@globalgulls.com (as listed in our Terms of Service). Please include "Privacy Inquiry" in your subject line to help us direct your query appropriately.
- **Phone Number:** (210) 343-5259 (as listed in our Terms of Service).

We are committed to addressing your privacy-related inquiries in a timely and effective manner. Using a specific channel or subject line for privacy matters can assist us in prioritizing and responding to these important communications efficiently.

14. Governing Law

This Privacy Policy shall be governed by and construed in accordance with the laws of the State of Texas, United States of America, without regard to its conflict of law principles. This is consistent with the governing law provision in our Terms of Service.

The choice of governing state law is significant as it may determine the primary state-level privacy laws and regulations applicable to Global Gulls' operations and the interpretation of this Policy. It is crucial that Global Gulls specify this state, as it has direct implications for compliance requirements, particularly with the evolving landscape of U.S. state privacy

legislation.