**PRIVACY POLICY**

1. **Introduction**
	1. This Privacy Policy ("**Policy**") governs how VABA LLC, collects, protects and uses the information Users may provide on the Platform.
	2. This Privacy Policy shall apply to all such Data Subjects as referred to herein below:
2. Customers;
3. Users; and
4. Visitors of the Platform.
	1. Please note that privacy of the Data Subjects is of paramount importance to us. We are subject to various data protection and privacy legislations. Therefore, we ensure that the right measures are taken to ensure that we are in compliance with these legislations.
	2. The terms "**Personal Data**", "**Data Processing**", "**Data Subject**", "**Data Controller** and "**Data** **Processor**" have the same meaning as under General Data Protection Regulation ("**GDPR**"). Other capitalized terms referred to in this Policy shall have the same meaning as in the Terms and Conditions of the Platform.
5. **What Data is Collected?**
	1. We collect different categories of Personal Data. Following is a non-exhaustive list of the types of data which may be collected:
6. Contact details – this includes, but is not limited to, mailing address, telephone number, and email;
7. Financial details – credit card details and other banking details;
8. Personal details– this includes, but is not limited to, name, government issued identity document, passport details, gender and date of birth;
9. Location – this includes, but is not limited to, residential address, business address and IP address;
10. Correspondence with VABA LLC – this includes, but is not limited to, all communications and correspondence that you may have, in any form whatsoever, with VABA LLC or its representatives.
11. Sensitive data – this includes, but is not limited to, biometric data procured for identity verification processes.
	1. We also obtain data through technological means, such as cookies. This data includes, but is not limited to domain name, IP address, web logs, traffic data and screen content.
12. **When is the Data Collected?**
	1. VABA LLC may collect your Personal Data during the following instances:
13. You share your data with us;
14. You purchase the Airport Services;
15. You use the Platform;
16. You participate in our marketing activities of whatsoever nature; and
17. You engage in a conversation with us or our representatives in any form whatsoever.
18. **How is the Data Used and Processed?**
	1. We at all times use and process your data in accordance with the GDPR and other applicable laws. We will only use and process Personal Data if such and use and processing falls under one of the purposes stated herein below:
19. For compliance with all applicable legal or contractual obligations;
20. By obtaining your consent. If such consent is obtained, we reserve the right to use the Personal Data for such purposes for which we have been authorized. You may withdraw such consent at any time by writing back to us;
21. For the purposes of securing any legitimate interest of our own or our partners. However, we use reasonable efforts to ensure that such interests have greater weightage than your data protection rights;
22. If it is necessary for us to use and/or process the Personal Data to enable you access to the Airport Services through the Platform; or
23. For the purposes of securing any substantial public interest, such as prevention of harm, fraud or any other illegal activity.
	1. Subject to clause 4.1 of this Policy, we reserve the right to use and process the Personal Data as follows (this is a non-exhaustive list):
24. For identity verification of Data Subjects;
25. Creation of accounts on the Platform;
26. Compliance with legal, tax and regulatory obligations;
27. To ensure that all our obligations and responsibilities are properly complied with;
28. To ensure that reasonable access of the Platform and the Airport Services is provided to the Customers;
29. For the purposes of advertising the Platform therein;
30. To apprise you with the details of the Airport Services, and details in relation to advertising and marketing of the Platform (such as sending news-letters and emails);
31. For analysis and evaluation of the performance of the Platform and understand your requirements and needs;
32. To ensure that you can use the interactive features of the Platform; and
33. Disclosure to third parties where required.
34. **Rights of the Customer**
	1. You may choose to restrict our access to Personal Data by:
35. Disabling the cookies from your browser;
36. Withhold or not providing us the Personal Data;
37. Withdrawing your consent, wherever you have provided us the consent to use, access and process the Personal Data; and
38. Requesting us to not use the Personal Data for any purposes of marketing.
	1. However, please note that restricting such access will negatively impact the experience of your usage of the Platform, particularly those parts which specifically require us to use, access or process your Personal Data.
	2. You may further exercise the following rights related to the Personal Data we use, collect and process:
39. **Rights to access:** All Personal Data retained by us can be accessed by you.
40. **Rights to rectify:** You can update all Personal Data through your account on the Platform. However, there may be certain data which may be restricted for rectification. Please contact us if you wish to rectify such data.
41. **Rights to receive**: You can request us to send you Personal Data that have been provided to us. Such data can be provided in a machine-readable format.
42. **Right to object**: In the event you do not wish for us to process your Personal Data, you have the right to object by providing specific reason as to why such data shall not be processed. We will entertain the objections unless we can substantiate that the use of Personal Data is necessary or falls within one of the grounds specified in clause 4 of the Policy.
43. **Right to erasure**: You may request us to completely erase your Personal Data from our records if you have reasonable grounds to believe that such data has been used in non-compliance of this Privacy Policy or GDPR. However, please note that you cannot exercise this right when we are under a legal obligation to retain the data.
44. **Right to complaint:** If you have reasonable grounds to believe that your Personal Data is being used in non-compliance of this Privacy Policy or GDPR, you may lodge a complaint with the competent authority.
45. **Security of Data**
	1. During the collection and retention of Personal Data, we will protect it within commercially acceptable means to prevent loss and theft, as well as unauthorized access and disclosure. Following is a non-exhaustive list of measures that we adopt:
46. Data encryption;
47. System’s protection through firewall;
48. Implementation of threat detection and prevention mechanisms;
49. Internal security;
50. Privacy training for our employees, agents and contractors;
51. Continuous monitoring of all systems infrastructure;
52. Regular data back-ups.
	1. Notwithstanding the above, please note that no method of electronic transmission or storage is 100% secure. Therefore, no Data Controller or Data Processor can guarantee absolute security. We disclaim liability for data breaches which are beyond our reasonable control.
53. **Data Retention**

Your Personal Data is only retained by us as long as we are required to do so. Such duration may depend on the nature of the Personal Data and the purpose for which it is retained. If the Personal Data is no longer required, it will be deleted. However, if necessary, we may retain your Personal Data for compliance with legal, accounting or reporting obligations.

1. **Third Party Disclosures**
	1. VABA LLC needs to disclose Personal Data to various third parties in order to provide, improve and promote the Platform and the Airport Services. Such third parties may include, but is not limited to our suppliers (such as web-hosting companies, social media companies, search engines, financial institutions, auditors, lawyers etc.), agents, contractors, employees, customers, law enforcement agencies and other relevant regulatory authorities.
	2. Third party disclosures apply to all Data Subjects. These disclosures will be necessary for one of the purposes stated in clause 4 of this Policy. However, we ensure that such third parties implement all data protection measures specified herein.
	3. In the event our business is sold to another individual or entity, or we undergo a reorganization which includes but is not limited to any legal merger, acquisition and scheme of amalgamation, you agree that your Personal Data may be transferred to any such reorganized entity.
	4. Your Personal Data may need to be transferred to countries outside if required. We ensure that such transfer complies with all applicable laws.
2. **Personal Data Breaches**
	1. If VABA LLC becomes aware of any Personal Data Breach affecting your Personal Data, VABA LLC will notify you without undue delay after having become aware of it and:
3. provide you with a detailed description of the Personal Data Breach;
4. the type of data that was the subject of the Personal Data Breach;
5. the identity of each affected person, as soon as such information can be collected or otherwise becomes available (as well as periodic updates to this information and any other information that you may reasonably request relating to the Personal Data Breach);
6. take reasonable commercial steps immediately, at VABA LLC’s own expense, to investigate the Personal Data Breach and to identify, prevent and mitigate the effects of the Personal Data Breach and to carry out any recovery or other action necessary to remedy the Personal Data Breach; and
7. not release or publish any filing, communication, notice, press release, or report concerning the Personal Data Breach without your prior written approval except where VABA LLC is required by the applicable laws to make such disclosure prior to obtaining your written consent.
	1. VABA LLC’s notification of or response to a Personal Data Breach under this clause will not be construed as an acknowledgement by VABA LLC of any fault or liability with respect to the Personal Data Breach.
8. **Amendments and Supplements**
	1. We reserve the right to change or modify this Policy at any time without prior notice. The updated version will be posted on the Platform. Please make sure to familiarize yourself with the latest version.
	2. This Policy may be supplemented by additional policies if needed. Each supplemental policy may specifically apply to one or more Data Subjects.
9. **Further Information**

If you have any queries regarding this Policy and the contents therein, we would be happy to address those. Please contact us using the contact details.

1. **Contact US**

If you have any queries, questions or concerns, you may contact us at the following:

[xx]