



## Privacy Shield Policy

ATPI Limited (trading as ATPI) complies with the EU-U.S. Privacy Shield Framework, and the Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. 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 this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.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 – 3844059
- ATP USA Inc - 4025041

ATPI commits to all personal data transferred from the EU and Switzerland to the US to be subject to the principles of the Shield. ATPI only receives personal data for the purposes of arranging travel-related services, and will not use that 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:

Michael Beacher, Group Company Secretary  
ATPI, Rivercastle House, 10 Leake Street, London, England SE1 7NN  
Email [michael.beacherPS@atpi.com](mailto:michael.beacherPS@atpi.com)

Personal data will only be onward transferred to 3rd parties who are directly involved in the fulfilment of travel arrangements for our travellers, and for that specific purpose only. These will include (but are not limited to) airlines, hotels, and global distribution systems. This data will be kept securely by the 3rd 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 transfer applies.

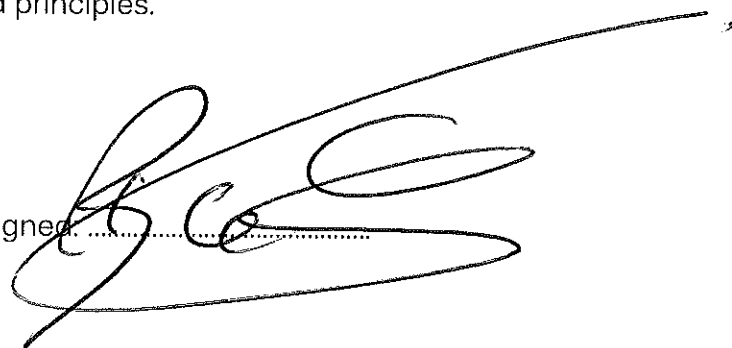
Individuals have the right of access to their own personal data with the ability to have that data corrected or deleted, or limiting its use or its disclosure. An individual may also elect not to have their personal data transferred to one or more 3rd parties, or processed for a specific purpose, but 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, the Department of Transportation, 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 utilise the external services of the UK Information Commissioner's Office or the Swiss Federal Data Protection and Information Commissioner's office, for free dispute resolution arising from the processing of personal data under the Shield. It may be possible for an individual to invoke binding arbitration in certain circumstances if agreed with the Commissioner's Office.

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 .....

A large, stylized handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

**Michael Beacher**  
**Group Company Secretary**  
April 2017