Navigator™ Privacy Policy

Last Updated [8-24-26]

Thank you for using Navigator. We are committed to protecting your privacy and, for that reason, we have adopted this Privacy Policy to explain our data collection, use, and disclosure practices for the Navigator services (including the asknavigator.ai website, and web-based applications, and any other tools, products, or services provided by Navigator that link to or reference this Privacy Policy) (collectively, the "Services"). The Services are owned and operated by Navigator Technologies 1802, Inc., a Delaware corporation ("Navigator", "we", "us", or "our").

If you reside in the State of Connecticut, please click here to learn more about your privacy rights. To the extent that there is a conflict between this Privacy Policy and the Privacy Notice for Connecticut Consumers, the Privacy Notice for Connecticut Consumers will prevail with respect to Connecticut Consumers (as defined in the Privacy Notice for Connecticut Consumers) only.

If you reside in a country in the European Economic Area, the United Kingdom, or Switzerland, please click here to learn more about your privacy rights. To the extent that there is a conflict between this Privacy Policy and the Privacy Notice for European Residents, the Privacy Notice for European Residents will prevail with respect to European Residents (as defined in the Privacy Notice for European Residents) only.

This Privacy Policy applies to information Navigator collects through the Services, as well as other information provided to us online or offline by third parties, when we associate that information with customers or users of the Services; however, it does not apply to information collected from our employees, contractors, or vendors. It also does not apply to information that you ask us to share with third parties or that is collected by certain other third parties whose software or services are featured or included in the Services (as further described below).

This Privacy Policy describes, among other things:

- Personal and other information we collect about you;
- How we use your information;
- How we may share your information with third parties; and
- Your choices regarding the personal information we collect about you.

1. Consent

By accessing or using the Services, you consent to this Privacy Policy. If you do not agree with this Privacy Policy, please do not access or use the Services. Information gathered through the Services may be transferred, used, and stored in the United States or in other countries where our service providers or we are located. If you use the Services, you agree to the transfer, use, and storage of your Personal Information (as defined below) in those countries. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. You agree that all transactions relating to the Services or Navigator are deemed to occur in the United States, where our servers are located.

2. Collection of Your Personal and Other Information

When you register for or use our Services, we collect Personal Information. By "Personal Information" we mean information that can identify or reasonably be linked to an individual, such as:

- Names;
- Personal or business addresses;
- Email addresses;
- Phone numbers;
- Date of birth;
- Gender;
- Citizenship or immigration status;
- IP address;
- Identification documents, such as images of your government-issued identification documents, passport, national ID card, driver's license, or other similar documents;
- Credit card information (which you submit for payment purposes and which is collected by our payment provider);
- Information contained in any message, image, photograph, or profile you submit to us or to an Operator (as defined in Section 4 below), which may include information about a disability or condition (such as a food allergy, dietary restriction, or accessibility requirement) for which you request an accommodation from an Operator; and
- Records of the Experiences (as defined in Section 4 below) that you sign up to take and have taken.

We may also request that you provide the information of other individuals (including their Personal Information), such as the name, phone number, and email address of an emergency contact. To the extent that you are providing such information, you represent and warrant that you have all the necessary permissions and legal abilities to do so.

We also use technology from our third-party service providers to collect user experience data, which reproduces your interactions with the Services, including mouse movements, page scrolling, screen taps, and other actions you take while using the Services. Reproduced data may include technical and usage data, as well as visual representations of actions you take while using the Services. The technology we use to collect user experience data does not record the contents of your communications with us. Our use of this data is limited to helping us understand how users interact with our Services and to design a better user experience for you.

You may choose not to provide Personal Information, but this may prevent you from receiving certain features of the Services.

We also collect non-Personal Information relating to the Services, that is, information that does not personally identify an individual ("Non-Personal Information"). The non-Personal Information we collect includes how you interact with the Services, information generally collected or "logged" by Internet websites or Internet services when accessed or used by users, and information about your web browser or device accessing or using the Services.

Examples of the non-Personal Information we collect are:

- The pages of our website that you viewed during a visit;
- What information or content you view or interact with using the Services;
- The country in which you are located (but not your precise geographic location); and
- Unique identifiers that are not connected and cannot reasonably be connected to your identity.

We will not use non-Personal Information to try to identify you, and if we associate any non-Personal Information with information that personally identifies you, then we will treat it as Personal Information. As discussed in more detail below, we sometimes use cookies and other automatic information gathering technologies to gather Personal Information and non-Personal Information.

Information collected by the Services may be collected by us or one of the third parties we utilize in providing the Services (as further described below).

3. <u>Use of Your Information</u>

We may use the information we collect to:

- Assist us in providing, maintaining, and protecting the Services;
- Set up, maintain, and protect accounts to use the Services;
- Improve our online operations;
- Process transactions and facilitate payments to Operators;
- Provide customer service;
- Communicate with you, such as provide you with account- or transaction-related communications, or other newsletters and/or other communications relating to the Services, and to enable Operators and other Experience participants to communicate with you;
- Send or display offers and other content that is customized to your interests or preferences;
- Prevent fraud and other misuse;
- Perform research and analysis aimed at improving our products and services and developing new products or services;
- Manage and maintain the systems that provide the Services; and
- Comply with our legal obligations and exercise our legal rights.

4. <u>Disclosure of Your Information</u>

We may disclose your Personal Information to third parties as described below.

We may disclose Personal Information to provide the Services, or when you authorize or instruct us to do so, for example, when you use the Services to submit content or profile information. This includes disclosures of Personal Information (including sensitive Personal Information like government issued identification (such as a driver's license or passport)) to the operators ("Operators") of any trip, tour, activity, excursion, or other event or experience you book through the Services ("Experiences"). An Operator may also share your Personal Information with the Operator's vendors and service providers, such as the caterers for an Experience. Operators can access your Personal Information through the Services from the time you book an Experience until shortly after an Experience's scheduled end date, when we remove an Operator's ability to access your Personal Information through the Services. Please note,

however, that an Operator may download or export your Personal Information from the Services, in which case we have no control over, and no liability for, how that Operator stores, processes, or discloses your Personal Information.

We may also disclose Personal Information and non-Personal Information to Service Providers. By "Service Providers" we mean companies, agents, contractors, service providers, or others engaged to perform functions on our behalf (such as processing of payments, provision of data storage, hosting of our website, marketing of our products and services, and conducting audits). When we use a Service Provider, we require that the Service Provider use and disclose the Personal Information received from us only to provide their services to us or as required by applicable law.

We may also disclose Personal Information and non-Personal Information to Online Tool Providers. By "Online Tool Provider" we mean a licensor of software that we include in, or use with, the Services, including an API or SDK, that provides a specialized function or service to us and that requires the transmission of Personal Information and/or non-Personal Information to the Online Tool Provider. Online Tool Providers may have the right to use Personal Information and non-Personal Information about you for their own business purposes. Use and disclosure of Personal Information and non-Personal Information by an Online Tool Provider is described in its privacy policy. See Section 5 below for some of the key Online Tool Providers we use.

Additionally, we may disclose Personal Information to our Payment Providers. A "Payment Provider" is a third party payment gateway provider or provider of other payment services. Payment Providers may be regulated as financial services companies and/or subject to the rules of the payment card networks. Therefore, Personal Information received by a Payment Provider may be used for its own purposes, including compliance with legal and audit obligations. You can learn more by reviewing their privacy policies: Stripe Connect.

We may also disclose your Personal Information with Operators or other users of the Services, when you direct us to do so, for example, if you include Personal Information in a communication to another user of the Services or include Personal Information in a review for the Services or an Experience.

We may also disclose your Personal Information to third parties when we believe, in good faith and in our sole discretion, that such disclosure is reasonably necessary to (a) enforce or apply the terms and conditions of the Services, including investigation of potential violations thereof, (b) comply with legal or regulatory requirements or an enforceable governmental request, (c) protect the rights, property or safety of us, our users or other third parties, (d) submit insurance claims, cooperate with insurance investigations, and fulfill insurance subrogation activities, (e) prevent a crime or protect national security, or (f) detect, prevent or otherwise address fraud, security or technical issues.

Finally, we reserve the right to transfer information (including your Personal Information) to a third party in the event of a sale, merger, or transfer of all or substantially all of the assets of our company relating to the Services, or in the unlikely event of a bankruptcy, liquidation, or receivership of our business. We will use commercially reasonable efforts to notify you of such transfer, for example, via email or by posting notice on our website.

Lastly, we may also disclose non-Personal Information, aggregated with information about our other users, to our clients, business partners, merchants, advertisers, investors,

potential buyers and other third parties if we deem such disclosure, in our sole discretion, to have sound business reasons or justifications.

5. Cookies and Automatic Information Gathering Technologies

Every time you use the Services (e.g., access a Service webpage), we collect Personal Information and non-Personal Information (discussed above in Section 2) regarding that use. For example, to improve our Services, we collect how, when, and which parts of the Services or their features you use, which social media platforms you connect to the Services, and when, how, and what you post to the social media platforms through the Service app. Also, we may use your device's unique identifier (UDID) or other unique identifiers to assist us in collecting and analyzing this data.

To assist us in collecting and storing this non-Personal Information, we may employ a variety of technologies, including "Cookies," local browser storage, and "web beacons," "pixels," or "tags." A "Cookie" is a small amount of data a website operator, or a third party whose content is embedded in that website, may store in your web browser and that the website operator or, as applicable, the third party, can access when you visit the website. A web beacon, pixel or tag is a small, usually-transparent image placed on a web page that allows the operator of that image, which may be the operator of the website you visit or a third party, to read or write a Cookie.

Your operating system and web browser may allow you to erase information stored in Cookies and local browser storage. But if you do so, you may be forced to log in to the Services again, and you may lose some preferences or settings. You may also be able to set your browser to refuse all website storage or to indicate when it is permitted, but some features of our Services may not function properly without it. We may use Cookies to keep you logged in, save your preferences for the Services, and to collect information about how you use our Services.

More information about managing Cookies is available here. To learn how to manage privacy and storage settings for your local browser storage, please refer to the end user documentation for your browser.

An Online Tool Provider may collect information automatically, in which case Personal Information and non-Personal Information it receives are subject to the Online Tool Provider's privacy policy. Some Online Tool Providers may allow you to opt out of certain collection and/or uses of your information. You can read more here:

Google Cloud

Google Maps

Datadog

FullStory

Firebase

Mapbox

SendGrid

Giphy

Resend

6. Transparency and Choice; Do Not Track Signals

You may request access to your Personal Information by sending an email to info@asknavigator.ai. We will try to locate and provide you with your Personal Information and give you the opportunity to correct this data, if it is inaccurate, or to delete it, at your request. But, in either case, we may need to retain it for legal reasons or for legitimate business purposes. You may also remove any content that you post to the Services using the deletion or removal options within the Services. However, we (and you) are not able to control information that you have already shared with other users or made available to third parties through the Services.

If you need further assistance with removing any content you posted through the Services, you can email us at info@asknavigator.ai. Removal of your posted content may not ensure complete or comprehensive removal from our computer systems.

We ask individual users to identify themselves and the information requested to be accessed, corrected, or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, would be extremely impractical (for instance, requests concerning information residing on backups), or relate to information that is not associated with your Personal Information. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. We may also require you to verify your identity to our satisfaction before providing you with access to Personal Information.

Please be aware that if you request us to delete your Personal Information, you may not be able to continue to use the Services. Also, even if you request that we delete your Personal Information, we may need to retain certain information for a limited period of time to satisfy our legal, audit and/or dispute resolution requirements.

We may use third-party service providers that collect information for interest-based advertising purposes (advertisements that are tailored to your likely interests, based on categories in which you have shown an interest). To learn more about these third parties and the choices they offer users, please visit the Network Advertising Initiative's choices page or the Digital Advertising Alliance's choices page. If you are reading this Privacy Policy from a mobile device, you can learn more about the DAA's mobile choices program here.

We support the development and implementation of a standard "do not track" browser feature that provides customers with control over the collection and use of information about their web-browsing activities. Once a standardized "do not track" feature is released, we intend to adhere to the browser settings accordingly.

You can opt out of receiving marketing e-mails from us by clicking on the "unsubscribe" link in the e-mails. Please note that it may take up to ten (10) business days for your opt-out request to be processed. Also, even if you opt out of marketing e-mails, we may continue to send you certain account-related e-mails, such as notices about your account and confirmations of transactions you have requested.

7. Certain State Residents

You may have heard of the various state data privacy laws currently in effect in the United States that provide rights to state residents in connection with Personal Information. Our Services are currently only subject to the Connecticut Data Privacy Act (CTDPA). However, we do provide notice and transparency about our collection and use of Personal Information as described in this Privacy Policy.

8. Residents of Canada

If you have an objection to the use of your Personal Information as described in this Privacy Policy, you may file a complaint by sending an email to info@asknavigator.ai. We will attempt to accommodate your objection or complaint, but you understand that, to the extent you object to our processing of Personal Information that is necessary for us to provide the Services to you, certain features and functionalities of the Services may no longer be available to you. Nothing in this Privacy Policy prejudices your rights to file a complaint with the Office of the Privacy Commissioner of Canada, and/or with any other applicable data protection authorities.

9. Residents of Nevada

We do not sell your Personal Information. However, you may contact us at info@asknavigator.ai with questions.

10. Children

The Services are not intended for users under 18 years of age. We do not knowingly collect Personal Information from users under 18 years of age. We do not authorize users under 18 years of age to use the Services.

To provide certain Services we offer, and to facilitate the booking of Experiences, we may need to collect Personal Information about children under the age of 13 from a child's parent or legal guardian. To the extent that you are providing such information, you represent and warrant that you are the parent or guardian of the minor whose Personal Information you are providing and that you have all the necessary permissions and legal abilities to do so. If we learn that someone under 13 has provided Personal Information through the Services, we will use reasonable efforts to remove that information from our databases. If you are a parent or legal guardian and become aware of any data we may have collected from your child or have any questions regarding Navigator's data collection practices, please contact us at info@asknavigator.ai.

11. Information Security

We utilize reasonable information security measures to safeguard your Personal Information against unauthorized access, modification, or destruction. For example, we utilize Transport Layer Security (TLS), or similar encryption technology, when sensitive data is transmitted over the Internet, and use firewalls to help prevent external access into our network. However, no data transmission over the Internet and no method of data storage can be guaranteed to be 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its security.

We restrict access to Personal Information in our possession to our employees, Service Providers, and Online Tool Providers who need to know that information in order to operate, develop, improve or support our Services.

12. Third Party Websites

Please note that the Services may link or integrate with third-party sites, services or apps. We are not responsible for the privacy or security policies or practices or the content of such third parties. Accordingly, we encourage you to review the privacy and security policies and terms of service of those third parties so that you understand how they collect, use, share and protect your information.

13. Changes to this Policy

We may modify or update this Privacy Policy periodically with or without prior notice by posting the updated policy on this page. You can always check the "Last Updated" date at the top of this document to see when the Privacy Policy was last changed. If we make any material changes to this Privacy Policy, we will notify you by reasonable means, which may be by e-mail or posting a notice of the changes on our website prior to the changes becoming effective. We encourage you to check this Privacy Policy from time to time. IF YOU DO NOT AGREE TO CHANGES TO THIS PRIVACY POLICY, YOU MUST STOP USING THE SERVICES AFTER THE EFFECTIVE DATE OF SUCH CHANGES (WHICH IS THE "LAST UPDATED" DATE OF THIS PRIVACY POLICY).

14. Questions

To ask questions about our Privacy Policy or to lodge a complaint, contact us at:

Navigator Technologies 1802, Inc.

Email: info@asknavigator.ai

Privacy Notice for Connecticut Consumers

This Privacy Notice for Connecticut Consumers (the "**Notice**") supplements the information contained in our Privacy Policy and applies only if you reside in the State of Connecticut (you are a "**Connecticut Consumer**").

For purposes of this Notice "Sell," "Selling," "Sale," or "Sold," means the exchange of Personal Information for monetary or other valuable consideration by Navigator to a third party. "Sell," "Selling," "Sale," or "Sold," does not include the following:

- Disclosure of Personal Information to a third party that processes data on behalf of Navigator;
- Disclosure of Personal Information to a third party for purposes of providing a product or service requested by you;
- Disclosure or transfer of Personal Information to an affiliate of Navigator;
- Disclosure or transfer of Personal Information to a third party as an asset that is part of a proposed or actual merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of Navigator's assets; and
- Disclosure of Personal Information that is intentionally made available by you to the general public via a channel of mass media without restricting the Personal Information to a specific audience.

"Sensitive Personal Information" means any of the following: (1) Personal Information revealing racial or ethnic origin, religious beliefs, a mental or physical health condition or diagnosis, sex life or sexual orientation, or citizenship or citizenship status; (2) genetic or biometric data, or information derived from genetic or biometric data; (3) Personal Information from a person known to be under 13 years of age, or from a person who is under 13 which is collected with willful disregard to their age; (4) precise geolocation data; (5) your status as the victim of a crime; (6) your status as transgender or nonbinary; (7) financial information, which includes your account numbers, account log-in, financial accounts, or credit or debit card number, in combination with any required security code, access code, or password that would permit access to those accounts; or (8) government-issued identification numbers, such as your Social Security Number or passport number.

"Verifiable Request" means the identifying information provided by a consumer in connection with a request that matches the Personal Information of the consumer already maintained by us. Identifying information includes name, email address, and phone number.

"Targeted Advertising" means displaying to a consumer an advertisement that is selected based on Personal Information obtained or inferred over time from the consumer's activities across nonaffiliated websites, applications, or online services to predict consumer preferences or interests. "Targeted Advertising" does not include the following:

- Advertising to a consumer in response to a consumer request;
- Advertisements based on activities within our own websites or online applications;
- Advertisements based on the context of a consumer's current search query, visit to a website, or online application; or
- Processing Personal Information solely for measuring or reporting advertising performance, reach, or frequency.

"Profiling" means any form of automated processing of Personal Information to evaluate, analyze, or predict personal aspects concerning an identified or identifiable individual's

economic situation, health, personal preferences, interests, reliability, behavior, location, or movements.

"Relevant Data Privacy Law" means the Connecticut Data Privacy Act (CTDPA).

1. Information We Collect or Process

Navigator has collected or processed the following categories of Personal Information from Connecticut Consumers:

- Names;
- Personal or business addresses;
- Email addresses;
- Phone numbers;
- Date of birth;
- Gender;
- Citizenship or immigration status;
- IP address;
- Identification documents, such as images of your government-issued identification documents, passport, national ID card, driver's license, or other similar documents ("Travel Identification Documents");
- Credit card information (which you submit for payment purposes and which is collected by our payment provider);
- Information contained in any message, image, photograph, or profile you submit to us or to an Operator, which may include information about a disability or condition (such as a food allergy, dietary restriction, or accessibility requirement) for which you request an accommodation from an Operator; and
- Records of the Experiences that you sign up to take and have taken.

The above-listed categories of Personal Information collected from Connecticut Consumers may include Sensitive Personal Information. By accessing or using the Services, you consent to the collection and processing of Sensitive Personal Information in the categories listed above. If you do not consent to the collection and processing of Sensitive Personal Information within these categories, please do not access or use the Services.

Navigator obtains this Personal Information from the following types of sources:

- Directly from you. For example, from forms you complete or products and services that you purchase.
- Indirectly from you. For example, from information automatically sent by your web browser or from analyzing data about your actions on our website.

The above-listed categories of Personal Information collected from Connecticut Consumers may include Sensitive Personal Information. By accessing or using the Services, you consent to the collection and processing of Sensitive Personal Information in the categories listed above. If you do not consent to the collection and processing of Sensitive Personal Information within these categories, please do not access or use the Services.

2. Use of Personal Information

Navigator may use or disclose the Personal Information we collect for one or more of the following "Business Purpose(s):"

- To fulfill or meet the reason you provided the information;
- To assist us in providing, maintaining, and protecting the Services;
- To set up, maintain, and protect accounts to use the Services;
- To improve our online operations;
- To process transactions and facilitate payments to Operators;
- To provide customer service;
- To communicate with you, such as provide you with newsletters and/or other communications relating to the Services, and to enable Operators and other Experience participants to communicate with you;
- To send or display offers and other content that is customized to your interests or preferences;
- To prevent fraud and other misuse;
- To perform research and analysis aimed at improving our products and services and developing new products or services;
- To manage and maintain the systems that provide the Services;
- To comply with our legal obligations and exercise our legal rights;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To respond to your requests under the Relevant Data Privacy Law;
- For any other purpose described to you when we collect your Personal Information; and
- For any other acceptable purposes as set forth in the Relevant Data Privacy Law.

Unless we notify you otherwise, we will not collect additional categories of Personal Information, nor use the Personal Information we collect for any purpose that is not reasonably necessary to nor compatible with the purposes disclosed in this Privacy Policy.

3. Disclosures of Personal Information

Navigator has disclosed your Personal Information as described in this Notice, including the following categories of Personal Information:

- Names;
- Personal or business addresses;
- Email addresses;
- Phone numbers;
- Date of birth;
- Travel Identification Documents;
- Credit card information (which you submit for payment purposes and which is collected by our payment provider); and
- Information contained in any message, image, photograph, or profile you submit to us.

Navigator discloses Personal Information to third parties for a Business Purpose that is reasonably necessary or compatible with the purposes disclosed in this Privacy Policy. When we disclose Personal Information for a Business Purpose, we enter into an agreement with the receiving party that describes the purpose for sharing the Personal Information, and that requires the receiving party to keep that Personal Information confidential.

We may disclose your Personal Information with the following categories of third parties: Service Providers, Operators.

In the past twelve (12) months, Navigator has not Sold any Personal Information about its Connecticut Consumers or processed Personal Information about its Connecticut Consumers for Profiling or Targeted Advertising.

4. Your Rights and Choices

If you are a Connecticut Consumer, you may request information about our collection and processing of your Personal Information, whether or not it was collected electronically. If you submit a Verifiable Request, we will disclose whether we have collected or processed your Personal Information and allow you to access the Personal Information we have collected, to the extent we continue to retain the Personal Information. To the extent technically feasible, we will disclose this information to you in a readily usable format that allows you to transmit the data to another entity without hindrance. In the event that you make more than (1) request in any twelve (12) month period, we reserve the right to charge a fee prior to processing any such request(s).

You also have the right to request that we delete any of your Personal Information that we collect or maintain by submitting a Verifiable Request. We may deny your deletion request if retaining your Personal Information is necessary for us or our Service Providers to:

- Complete the transaction for which we collected your Personal Information, provide goods or services that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Prevent or detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or investigate, report, or prosecute those responsible for such activity;
- Debug products to identify and repair errors that impair existing intended functionality;
- Engage in public or peer-reviewed scientific or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the achievement of such research, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
- Cooperate with law enforcement agencies concerning conduct or activities that we reasonably and in good faith believe may violate the law;
- Comply with a legal obligation; or
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

If you are a Connecticut Consumer, you further have the right to request that we correct any of your Personal Information that is inaccurate by submitting a Verifiable Request. We will correct any inaccurate Personal Information pursuant to your request, taking into account the nature of the Personal Information and the purposes of the processing of your Personal Information. We may deny your correction request if the Personal Information is accurate.

If you choose to exercise a privacy right under the Relevant Data Privacy Law, you have the right not to receive unlawful discriminatory treatment.

You may submit a Verifiable Request for the information listed above, or exercise any of your rights enumerated under this Notice, by completing a form on our website at or by email to

info@asknavigator.ai. You may also submit a Verifiable Request on behalf of your minor child who is under 13 years of age.

After we receive your Verifiable Request, we will provide to you, in writing, the requested information. You can choose to have this information delivered to you by postal mail or electronically. We will try to respond to your verified request within forty-five (45) days of receipt, but if we require more time (up to another forty-five (45) days) we will inform you of the reason and extension period in writing. If we decline to act on your request for any reason permitted under the Relevant Data Privacy Law, we will notify you of our decision within forty-five (45) days of receiving your request. If applicable, our response will explain the reasons why we cannot comply with your request.

If we deny your request or fail to act on it within the required time period, you may have the right to appeal this decision by submitting a new Verifiable Request in which you conspicuously note that you are appealing a previous decision. We will respond to your Verifiable Request to appeal within sixty (60) days of receipt. Our response will explain the reasons why we are denying your appeal, and any further steps that may be available to you.

Navigator does not and will not, without first obtaining your consent, process your Personal Information for Targeted Advertising, Profiling, and/or Sale to third parties. As noted above, however, we do Sell de-identified data.

Should you choose to exercise any of the rights enumerated under this Notice we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, please be aware that it may be a functional necessity for our Services to have Personal Information about you in order to operate, and we may not be able to provide some or all of our Services to you if you direct us to delete your Personal Information.

5. Retention of Your Information

We retain each category of your Personal Information for no longer than is reasonably necessary for the above lawful bases for processing, subject to your right to request we delete your Personal Information. We intend to retain Travel Identification Documents for a period of five days after an Experience's scheduled end date**.**

Due to the nature of the Services, it is not possible to predict the length of time that we intend to retain other categories of your Personal Information. Instead, we use the following criteria to determine whether it remains reasonably necessary to retain your other Personal Information for one or more disclosed lawful bases for processing:

- The generally accepted best practices in our industry;
- Whether or not there is a retention period required by statute or regulations;
- The pendency of any actual or threatened litigation for which we are required to preserve the information; and

- The pendency of applicable statutes of limitations for potential legal claims.

When we determine that it is no longer reasonably necessary to retain your Personal Information for one or more disclosed lawful bases for processing based on the above criteria, we will delete your Personal Information.

PRIVACY NOTICE FOR EUROPEAN RESIDENTS

If you reside in a country in the European Economic Area, the United Kingdom, or Switzerland (a "**European Resident**"), then information we collect from you may be subject to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "**EU GDPR**"), or the equivalent laws of the United Kingdom and Switzerland (collectively with the EU GDPR, "**Data Protection Laws**"), and the following additional information is provided for your benefit. For purposes of this Privacy Notice for European Residents, in addition to the meaning set forth in the Privacy Policy, "Personal Information" shall also include "personal data" as that term is defined by the EU GDPR, as well as "personal data" or similar terminology as defined by other applicable Data Protection Laws.

The controller of the Personal Information collected through the Services is:

Navigator Technologies 1802, Inc.
251 Little Falls Drive
Wilmington, Delaware 19808
United States of America

If you use the Services, you acknowledge that your Personal Information is being processed pursuant to the lawful bases described below, and you specifically consent to your Personal Information gathered through the Services being transferred, used, and stored in the United States or other third party countries which do not have local privacy laws that are equivalent to the Data Protection Laws. You acknowledge and agree that the local laws in such countries may be materially different from, and provide for a lesser degree of protection regarding your Personal Information (including, but not limited to, with respect to governmental and law enforcement agencies' ability to access your Personal Information under certain conditions) than, Data Protection Laws.

1. Personal Information

When you register for or use our Services, we collect the following categories of Personal Information:

- Names;
- Personal or business addresses;
- Email addresses;
- Phone numbers;
- Date of birth;
- Gender;
- Citizenship or immigration status;
- IP address;
- Identification documents, such as images of your government-issued identification documents, passport, national ID card, driver's license, or other similar documents ("Travel Identification Documents");
- Credit card information (which you submit for payment purposes and which is collected by our payment provider);

- Information contained in any message, image, photograph, or profile you submit to us or to an Operator, which may include information about a disability or condition (such as a food allergy, dietary restriction, or accessibility requirement) for which you request an accommodation from an Operator; and
- Records of the Experiences that you sign up to take and have taken.

We also process information related to your dietary restrictions, allergies, and accessibility requirements, which, when we link it to other data that identifies a natural person, represents Personal Information, and may qualify as personal data concerning health, which is a "special category of personal data" under the Data Protection Laws. We process this Personal Information with your explicit consent, and solely as necessary to provide the Services you have requested.

2. Your Rights

You have the following rights under applicable Data Protection Laws:

- You have the right to know why we collect your Personal Information, how and why it is processed by us, and what our legal bases for such processing are.
- Right of access: You have the right to access your Personal Information.
- Right to rectification and deletion: you have the right to supplement or correct the Personal Information we've collected about you, or to direct us to delete your Personal Information.
- If you give us your consent to process your Personal Information, you have the right to revoke that consent.
- Right to data portability: you have the right to request that we transfer all your Personal Information to another controller in a reasonably understandable format.
- Right to object: you may object to our processing of your Personal Information. We will make commercially reasonable efforts to comply with your objection, unless there are legally permissible reasons why we can or must continue to process your Personal Information.

3. Lawful Bases for Processing

Under European law, companies must have a legal basis to process data. You have particular rights available to you depending on which legal basis we use, and we've explained these above. You always have the right to request access to, rectification of, and erasure of your data under applicable Data Protection Laws. To exercise your rights, please email us at info@asknavigator.ai.

Pursuant to a contract with you:

We may process data as necessary to perform our contracts with you. We describe the contractual services for which this data processing is necessary throughout this Privacy Policy and in our Terms of Service (collectively, the "**Terms**"). The main uses of your data necessary to provide our contractual services are described in the Use of Your Information section of the Privacy Policy:

We'll use the Personal Information we have to provide the Services and as otherwise described in our Privacy Policy if you choose not to provide certain data, the quality of your experience using the Services may be negatively impacted.

When we process data you provide to us as necessary to perform our contracts with you, you have the right to receive a portable copy of it (meaning to receive a copy of your data in a structured, commonly used and machine-readable format) under applicable Data Protection Laws. To exercise your rights, please email us at info@asknavigator.ai.

The other legal bases we rely on in certain instances when processing your data are:

Your Consent:

We may process your Personal Information on the lawful basis of consent.

- To fulfill or meet the reason you provided the information;
- To disclose your information to third parties, when you direct us to make such disclosure; for example, disclosing your information to Operators when you book an Experience;
- To process transactions;
- To provide customer service; and
- To respond to your requests under the Data Protection Laws.

When we process data you provide to us based on your consent, you have the right to withdraw your consent at any time and to receive a portable copy of the data you provide to us, under applicable Data Protection Laws. To exercise your rights, please email us at info@asknavigator.ai.

Legitimate Interest:

We may process your Personal Information where our legitimate interests, or the legitimate interests of a third party, are not outweighed by your interests or fundamental rights and freedoms.

The legitimate interests for our processing of Personal Information are:

- To fulfill or meet the reason you provided the information;
- To assist us in providing, maintaining, and protecting the Services;
- To set up, maintain, and protect accounts to use the Services;
- To improve our online operations;
- To process transactions and facilitate payments to Operators;
- To provide customer service;
- To communicate with you, such as provide you with newsletters and/or other communications relating to the Services, and to enable Operators and other Experience participants to communicate with you;
- To send or display offers and other content that is customized to your interests or preferences;
- To prevent fraud and other misuse;
- To perform research and analysis aimed at improving our products and services and developing new products or services;
- To manage and maintain the systems that provide the Services;
- To comply with our legal obligations and exercise our legal rights;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To respond to your requests under the Data Protection Laws;
- For any other purpose described to you when we collect your Personal Information; and

- For any other acceptable purposes as set forth in the Data Protection Laws.

You have the right to object to, and seek restriction of, such processing; to exercise your rights, please email us at info@asknavigator.ai.

We will consider several factors when assessing an objection to our processing in furtherance of Navigator's legitimate interests, including: our users' reasonable expectations; the benefits and risks to you, us, other users, or third parties; and other available means to achieve the same purpose that may be less invasive and do not require disproportionate effort. Your objection will be upheld, and we will cease processing your information, unless the processing is based on compelling legitimate grounds or is needed for legal reasons.

Compliance with a legal obligation:

We need to process your Personal Information when applicable law requires it, including, for example, if there is a valid legal request for certain data.

4. Disclosures of Your Information

"**Processors**" means our Service Providers and their respective service providers.

We may also disclose your Personal Information, (as well as non-Personal Information, without the same restrictions that apply to your Personal Information) to our Processors who we engage to perform certain functions for us, or on our behalf (including, but not limited to, processing of payments, provision of data storage, hosting of our website, marketing of our products and services, conducting audits, and performing web analytics). A list of our Processors and a description of the services that they perform for us follows. We establish data processing agreements that govern our Processors' use of your Personal Information, but our Processors' use of your Personal Information may also be subject to the Processors' own privacy policies. See links to our Processors' privacy policies below.

Google

Datadog

FullStory

Firebase

Mapbox

Twilio

Giphy

Stripe

Databricks

Typesense

Resend

Neon Postgres

Sumsub

5. Retention of Your Information

We retain each category of your Personal Information for no longer than is reasonably necessary for the above lawful bases for processing, subject to your right to request we delete your Personal Information. We intend to retain Travel Identification Documents for a period of five days after an Experience's scheduled end date**.**

Due to the nature of the Services, it is not possible to predict the length of time that we intend to retain other categories of your Personal Information. Instead, we use the following criteria to determine whether it remains reasonably necessary to retain your other Personal Information for one or more disclosed lawful bases for processing:

- The generally accepted best practices in our industry;
- Whether or not there is a retention period required by statute or regulations;
- The pendency of any actual or threatened litigation for which we are required to preserve the information; and
- The pendency of applicable statutes of limitations for potential legal claims.

When we determine that it is no longer reasonably necessary to retain your Personal Information for one or more disclosed lawful bases for processing based on the above criteria, we will delete your Personal Information.

6. Questions and Complaints

If you have any questions or complaints regarding our use of your Personal Information, please contact us at info@asknavigator.ai. You also have the right to submit a complaint to your applicable Data Protection Authority.