

Privacy Policy

- Tongcheng (LY.com) reminds you: Tongcheng Website is operated by Tongcheng Network Technology Co., Ltd., Tongcheng International Travel Service Co., Ltd., Tongcheng's affiliated companies and etc.. When involving specific products and services, it will be provided by qualified service providers. If a user visits, reserves or uses a product or service of Tongcheng (collectively, "service") on this website, website of Tongcheng's affiliated companies, or on other mobile applications or software provided by Tongcheng (hereinafter referred to as "Tongcheng Website"), he or she shall be deemed to have accepted the following privacy policy. Please read the following content carefully, especially the Bold Fonts. If you do not agree to any of the following content, please stop accessing/using this website or any other mobile applications/software immediately. Both "Tongcheng" and "we" mentioned in this Privacy Policy refer to Tongcheng Travel Website, "user" and "you" refer to users who voluntarily accept this Privacy Policy.

- **1 、 Confirmation and Acceptance of Privacy Policy**

Respecting the personal privacy of user is a basic policy of Tongcheng. Tongcheng Website collects the tourism service information provided by qualified hotels, scenic spots, air ticket agencies, travel agencies and etc. on Tongcheng Website for user to consult. At the same time, it helps user to contact and book related tourism services of abovementioned hotels, air ticket agencies, travel agencies through Tongcheng Website. By completing the registration process and clicking the "Complete Registration" button, it means that the user clearly knows the facts listed in this privacy policy, and has reached an agreement with Tongcheng Network Technology Co., Ltd., Tongcheng International Travel Service Co., Ltd. and Tongcheng's associated companies, and has accepted all the terms of service.

We attach great importance to the protection of users' personal information and privacy security. We understand that providing information online involves a great deal of trust on your part. We take this trust very seriously and deeply understand the great importance to you, and make it a high priority to ensure the security and confidentiality of your privacy. If you have any questions or suggestions about our privacy policy, please contact us. Hotline: 400-100-2249 (Mainland China), +86-512-81669418 (Other locations).

- **2 、 Collection of Information**

(1) In order to serve you better, we will follow the "reasonable, relevant and necessary" principle to collect information under the premise of your consent, and will not collect information prohibited by Laws and Regulations. Considering the importance of Tongcheng membership service, user agrees that Tongcheng may collect all the information you input into the Tongcheng Website or otherwise provide to us.

- When you register as a member of Tongcheng, you need to provide information such as name, gender, birthday, mobile number, email and etc..
- When updating your personal information, you need to be timely, detailed and accurate.

- When booking a flight or train ticket, you need to provide information such as passenger's name, gender, birthday, ID document number, the contact person's name, mobile number, email, delivery address and etc..
- When booking a hotel or ticket for tourist attraction, you need to provide information such as traveler's name, ID card, the contact person's name, mobile number, email and etc..
- When paying for travel products, you need to provide your bank card number, the mobile number previously provided to the bank, credit card number, cardholder name, expiry date, CCV and etc..
- We may also collect information about your travel plans, styles and preferences including your meal requirements, travel/departure times, seat choice, ticket choice, insurance choice and your selection of other services (such as travel, car rental, attraction tickets, travel guides, visas, oversea pleasure and etc.) provided by Tongcheng.

(2) You may make a booking on someone else's behalf on Tongcheng, in which case you shall provide personal information of that traveler. However, we would like to remind you that it is your responsibility to ensure that consent is obtained and this privacy policy is well known and accepted by the traveler before you provide his/her personal information.

(3) We will collect your personal information automatically when you use the service of Tongcheng.

- Log information, which refers to information that the system may automatically collect through cookies, a web beacon, or other channels when you use our services, including:
 - Device information or software information, such as your IP address, software version and device identifier (IDFA/IMEI) of the mobile device you use and configurations of the web browser or mobile device you use to access our services.
 - Information that you searched for or browsed when you use our services, such as web pages used or terms searched and pages visited through the APP, as well as other information browsed or provided when using our services.
 - Information contained in the content you share through our services, such as a photo shared or uploaded, comments, dates, times and etc..
 - Location information, which we collect when you turn on your device's location feature and use our location-based services. This includes your geographical position information collected via GPS or WIFI, your location information contained in the account information you provide to us and shared information uploaded by you or other showing your current or previous location. You can turn off the location feature to prevent us from collecting your location information.

(4) We will also obtain your information from affiliates and business partners. For example, when you make a booking or reservation through the website or mobile app of one of our affiliates or business partners, your booking or reservation information with them might be forwarded to us so that we can process your order and ensure its success. Also, when we allowing you to login our account linked with your social media account, your personal information will be shared with us through that social platform under your consent (you grant authorization to the social platform).

• 3 、 The Use of Information

(1) Tongcheng will generally collect and use your personal information for the following purposes:

- Providing services to you: We will use your personal information to complete and manage your online booking. In addition, we will provide you with related products and services through affiliates, business partners, and third parties.
- Account management: You can create a Tongcheng account and we will use the information you provide to manage your account and provide you with practical features. You can use your account for various operations, such as managing bookings, adjusting personal settings, adding frequently used passenger information, checking past bookings, reviewing orders, managing payments and etc..
- Responding to your inquiries and requests: We provide customer service 7/24 in multiple languages to offer help when you need. Hotline: 400-100-2249 (Mainland China), +86-512-81669418 (Other locations)
- Marketing activities: We will also use your personal information for legitimate marketing purposes, such as sending you the latest news on travel products or services and providing personalized recommendations and information on other promotional activities that may interest you.
- Contacting you: Responding to and dealing with your questions or requests, sending booking-related messages (such as messages telling you of successfully submitted booking, messages reminding you to complete unfinished bookings and etc.). We may also send you questionnaires, invite you to provide feedback on our services and etc..
- Market survey: We sometimes invite you to participate in market survey to better understand your interest in our products, services and websites.
- Improving service security and reliability: We may detect and prevent fraud and illegal activities and use your personal information for risk assessment and security purposes.
- Data analysis: We may use your personal information for analysis so that we can get to know your location, your preferences and demographic information or match it with the data obtained from other sources (including third parties) in order to develop our products, services or marketing plans and to improve our services.
- Daily operations: Including but not limited to booking management, customer verification, technical support, network maintenance, troubleshooting, internal administrative affairs, internal policies and procedures, producing internal reports and etc..
- Phone monitoring: Your phone conversations with our customer service staff, both answering our calls and calling us, may be recorded. We may rely on these recordings to monitor the quality of our customer service, check the accuracy of the information you provide to prevent fraud or serve the purpose of internal staff training. The recording will be automatically deleted after being retained for a period of time, unless otherwise required by scenario needs for compliance requirements or legitimate interests.
- Performing obligations: Dealing with insurance claims and payments arising under relevant policies, dealing with commissions paid to partners, claims or payments for damages caused by service partners and etc..
- Legal purpose: We may need to use your information to handle and resolve legal disputes and comply with the documents issued by any Law, Regulation or Regulatory Agency that are binding on us, in order

to cooperate with the investigation of National Departments or Regulatory Agencies and comply with Laws and Regulations.

•In addition, we may collect, use and disclose your personal information for other purposes, and will inform you in the form of a revised statement.

(2) While enjoying the services provided by Tongcheng, you authorize and agree that we send you commercial information, including but not limited to the latest product information, promotional information and etc. to your email, mobile phone, communication address and etc.. If you choose not to accept all kinds of information services provided by Tongcheng, you can reject such information services according to the corresponding settings provided by Tongcheng.

(3)You are fully aware that we do not need your authorization to use personal information in the following situations:

- Relating to national security and national defense security;
- Relating to public security, public health and major public interests;
- Relating to criminal investigation, prosecution, trials and execution of judgments;
- For the purpose of protection of major legal rights and benefits such as the lives and properties of the personal information subject or other individuals when it is difficult to obtain the consent of the subject involved;
- The personal information collected is made available to the public by the personal information subject;
- Your personal information is collected from legally disclosed information such as legitimate news reports, government information disclosure and etc.;
- Necessary according to your requirements for signing the contract;
- Necessary for maintaining the safety and stable operation of the products and/or services provided, such as the detection and disposal of products and/or service failures;
- Required for legitimate news reports;
- Necessary for academic research institutions to conduct statistical or academic research for public interest, and the personal information contained should be de-identified while providing the result of academic research or description to the public;
- Other circumstances stipulated by Laws and Regulations.

• 4 、 Shareing, transfer and disclosure of the information

(1) We may share your booking information, account information, device information and location information with a third party such as corporate partners and etc. to ensure the successful accomplishment of services for you. However, we will share your personal information only for legitimate, appropriate, necessary, specific and explicit purposes, and will share only the necessary personal information for providing the service. Our partners include the following types (including domestic and foreign entities):

- Providers: Including but not limited to hotels, airlines, cruises lines, car rentals agencies, travel agencies, scenic spot operators and event providers and agents that meet your booking needs. These providers may contact you as needed to provide you with travel products or services.
- Financial institutions and third-party payment agencies: When you place a booking, apply for a refund or purchase insurance, we will share specific order information with the relevant financial institutions or the third-party payment agencies, and we will further share other necessary information with the relevant financial institutions as we consider it is necessary for fraud detection and prevention purposes, such as IP address and etc..
- Business Partners: We may work with our partners to provide you with products or services, including express delivery services, communication services, customer services, marketing, advertising and etc..
- Affiliated companies: We may share your personal information with our affiliated companies so that we can provide you with information about travel or other travel-related products and services, and they will provide similar protection measures for your personal information that are no less stringent than this privacy policy.

For companies and organizations with which we share personal information, we will sign strict confidentiality agreements with them requiring them to process personal information in accordance with this Privacy Policy and our other relevant confidentiality and security measures. Our partners shall have no right to use shared personal information for any other purpose, and will obtain your authorization to change the purpose of processing the personal information.

(2) Except for the following circumstances

we will not transfer your information to any companies, organizations or individuals:

- Get your specific consent or authorization in advance;
- In accordance with the requirements of applicable Laws and Regulations, legal procedures, compulsory administrative or judicial requirements;
- In the case of mergers, acquisitions, asset transfers or similar transactions involving the transfer of personal information, we will require the new company or organization that holds your personal information to continue to be bound by this privacy policy. Otherwise, we will require the company or organization to re-obtain authorization from you.

(3) Public disclosure

We will disclose your personal information to the public under the following conditions only:

- At your request, and limited to the personal information you designate in the manner you have consented;
- As required by Laws and Regulations, mandatory administrative enforcement or judicial orders, we may disclose your personal information in the type and manner as required. In accordance with the Laws and Regulations, we will require them to show the corresponding legal documents when we receive a disclosure request as mentioned above, such as summons or investigation letters.

• 5 · Information Preservation and Transboundary Transmission

(1) Unless it is necessary to extend the retention period, permitted by Laws or Authorities or to assist Authorities' inquiries, we will preserve your personal information for 3 months from the date when your account is cancelled.

(2) If we terminate the products or services of Tongcheng website, we will stop collecting your personal information in time, and will notify you the termination on an individual basis or an announcement. All personal information will be removed or anonymized.

(3) The personal information collected and generated within the territory of the People's Republic of China will be stored in China, except for the following circumstances:

- Specified by Laws and Regulations;
- Obtain your specific authorization;
- Your personal active behavior, such as transboundary transactions through the Internet.

• 6 、 The use of Cookie

A cookie is a text file that a web server puts on your device. It will help you to invoke information in subsequent access and simplify the recording process of filling in your personal information. You have the right to accept or reject cookie, and you can modify the browser's settings to reject cookies as you need if the browser receives cookies automatically. Please note that if you refuse to accept cookie, you may not be able to fully experience the services provided by Tongcheng.

• 7 、 Hints of personal sensitive information

Some particular personal information may be considered as personal sensitive information, such as your race, religion, personal health and medical information, which will be strictly protected. Tongcheng Privacy Policy reminds you that the content and information you uploaded or released when using products and services provided by Tongcheng may reveal your sensitive information. Therefore, you need to consider carefully before using products or services we provide for you. You agree that such sensitive personal information will be processed in accordance with the purposes and modalities set forth in Tongcheng Privacy Policy.

• 8 、 Information Security and Protection

(1) Tongcheng attaches great importance to information security and has set up a dedicated team for this particular purpose. We strive to protect your personal information and have taken appropriate managerial, technological and physical security measures. We also have established information security system which is adaptable to business development based on information security standards and best practice at home and abroad.

(2) In terms of the data life cycle, we have established security measures for all stages including data collection, storage, display, processing, use and destruction. We take different control measures according to the level of information sensitivity, including but not limited to access control, SSL

encrypted transmission, encrypted storage for encryption algorithms at AES256bit or above, data masking for sensitive information and etc.

(3) We take strict control over employees who may have access to your information, monitor their operations, establish approval mechanisms for important operations such as data access, internal and external transmission, data masking, decryption and sign confidentiality agreements with such employees. At the same time, we also train employees for information security regularly, require employees to grow good operating habits during their daily work and enhance awareness of data protection.

(4) Notwithstanding the foregoing security measures, please also understand that there are no "perfect security measures" for the Internet. We rely on currently available technologies and take appropriate security measures to protect your information. We will try our best to protect your information not to be leaked, damaged or lost.

(5) Your account has in-built security features. You are advised to properly safeguard your account and password and do not disclose your password to any person. If you discover your personal information has been leaked, especially your account and password, please contact our customer service staff immediately so that we can take appropriate measures.

(6) Please save or back up your text, pictures and other information in time, and please understand and accept that your access to our system and communication network applying for service may cause problems due to factors that beyond our control.

- **9 、 Information Security Incident Disposal**

In the event of a personal information security incident, we will inform you, in accordance with applicable Laws and Regulations: the basic information and possible impact of the security incident, measures we have taken or will take, suggestions on the precautions you can take to reduce risks, remedial measures for you and etc.. We will inform you the relative situations of incident by e-mail, letter, telephone, push notification and etc.. When it is difficult to notify a personal information subject on an individual basis, we will issue an announcement in a reasonable and effective manner. Furthermore, we will also report the disposition of personal information security incidents according to the requirements of regulatory authorities.

- **10 、 Protection of Minors' Information**

Tongcheng attaches great importance to the protection of minors' personal information. If you are a minor under the age of 18, you must obtain prior written consent from your parent or legal guardian before using our services.

- **11 、 User's Personal Information Management**

(1) You can login "my Tongcheng" - personal center, common information and etc. at any time to inquire, correct and delete your account information, modify personal data, privacy settings and security settings, modify the delivery address and other personal information that you provided when using Tongcheng's service. If you have any questions, you can contact Tongcheng's customer service. Customer service hotline: 400-100-2249 (Mainland China), +86-512-81669418 (Other locations).

(2) You may cancel the Tongcheng account by dialing the customer service number (e.g. 400-100-2249 for Mainland China, +86-512-81669418 for Other locations) which is posted on Tongcheng's official website, transferring call to an operator according to the voice prompt and completing the cancellation of the account after verification. After canceling the account, all information in your account will be cleared. We will no longer collect, use or share personal information related to the account. However, we still need to preserve the previous information for a period in accordance with the regulatory requirements, and the authorities still have the right to inquire according to Laws during the legal period.

- **12 ∙ Visit our website outside China Mainland**

If you visit our website from the outside of China mainland, please note that your information may be transmitted, stored and processed in the mainland of China. Data Protection Laws and other Laws in China mainland may be different from those in your country/region, but please be assured that we will take measures to protect your information. While choosing to use our services, you understand and agree that your information may be transmitted to our website and shared with a third party as we mentioned in this privacy policy.

- **13 ∙ Application of Privacy Policy**

In addition to specific services, all our services are applicable to "Tongcheng Privacy Policy". Specific services will be applied to specific privacy policies. Such privacy policy of specific services shall be deemed a part of "Tongcheng Privacy Policy". If the privacy policy for specific services is inconsistent with "Tongcheng Privacy Policy", the privacy policy for specific services shall prevail.

Please note that "Tongcheng Privacy Policy" does not apply to situations as follows: the information collected by third-party services (including any third-party website) which accessed through our services; the information collected by other companies and agencies that providing advertisement service in our services.

- **14 ∙ Modification of Privacy Policy**

Tongcheng will modify this Privacy Policy when necessary. Please understand that we may revise the Privacy Policy at times as we consider appropriate. We will note the date of the latest update of this Privacy Policy and the update will take effect when it is published. Without your explicit consent, Tongcheng will not reduce your rights under this Privacy Policy. Tongcheng will provide more prominent notification of major changes (for example, we will inform you via email for changes concerning certain

services, and explain the content of specific changes in the privacy policy). Therefore, you should review this Privacy Policy periodically to keep up with our most current version.

- **15 、Laws**

Privacy policies should be consistent with Country's national legal interpretation, including disputable contradictory content of provisions of Laws. User, Tongcheng Network Technology Co., Ltd., Tongcheng International Travel Service Co., Ltd., Tongcheng's affiliated companies and etc. agreed to accept the jurisdiction of the court. If any Article is conflicting with Laws, such Article shall be re-interpreted as close to Laws as possible. Meanwhile, other Articles shall remain legally valid and be bound to the user. Disputes arising from the interpretations of this Privacy Policy and any products booked by the user through Tongcheng website shall accept the jurisdiction of the People's Court of Suzhou Industrial Park.