

Privacy Policy – NEOPASS Platform

Effective Date: June 1, 2025

Introduction

NEO Pass Group LLC-FZ (“NEOPASS”, “we”, “our”, or “us”), located at Meydan Grandstand, 6th Floor, Meydan Road, Nad Al Sheba, Dubai, UAE, operates the NEOPASS platform (the “Platform”). We are committed to protecting the privacy and security of our users’ personal data. This Privacy Policy outlines our practices regarding the collection, use, sharing, and protection of your personal information, explicitly in compliance with UAE Federal Decree-Law No. 45 of 2021 (PDPL), the European General Data Protection Regulation (GDPR), the UK GDPR, the California Consumer Privacy Act as amended by the CPRA, and other applicable international data protection laws.

By accessing or using our Platform, you consent to the practices described in this Privacy Policy.

1. Information We Collect

We collect personal data necessary to provide our services, including:

- **Identification Information:** Full name, date of birth, nationality, passport details, and Emirates ID (collected only when legally required for travel bookings, identity verification, compliance with regulatory obligations, or where explicitly needed to provide requested services).
- **Contact Information:** Email address, phone number, residential or business address.
- **Financial Information:** Payment details, billing address, and transaction records (processed securely via certified third-party payment processors; NEOPASS does not directly store full payment card details on its own systems).
- **Travel Preferences:** Flight and hotel preferences, booking history, search history.
- **Technical Information:** IP address, browser type, operating system, access logs.
- **Third-Party Personal Data:** If you provide personal data about other individuals (such as family members, travel companions, or employees) when making bookings or referrals, you must ensure you have obtained their explicit consent or have a legal right to provide this data to us. It is your responsibility to inform them about this Privacy Policy and ensure their understanding and agreement.
- **Technical Information:** IP address, browser type, operating system, access logs (*collected automatically via cookies, tracking pixels, and similar technologies – see our Cookie Policy*).
- **Usage Information:** Information about how you interact with our Platform (*pages visited, searches conducted, duration of visits, services accessed, collected automatically through tracking technologies for analytics and service improvement purposes*)

2. How We Use Your Information

We use your personal data for:

- **Providing, Personalizing, and Improving our Services:** To operate the NEOPASS Platform, fulfill your membership benefits, customize content based on your preferences, and analyze usage data to enhance the quality of our services.

- **Processing Bookings and Payments:** To complete your travel reservations and securely process your payments through authorized third-party payment processors. NEOPASS does not directly store your full payment card details..
- **Communicating with You:** To send important notifications about your travel bookings (confirmations, reminders, alerts), manage your account (password resets, account updates), and inform you about service updates or changes affecting your membership.
- **Compliance with Legal Obligations:** To comply with applicable legal and regulatory requirements, including financial and tax reporting obligations, data protection laws, AML/KYC regulations, and lawful requests from regulatory or governmental authorities
- **Marketing and Promotional Communications:** To inform you of special offers, promotions, or new services offered by NEOPASS, exclusively with your explicit consent where required by applicable laws (such as GDPR, CPRA, and UAE PDPL). You can opt-out or withdraw your consent for marketing communications at any time via the unsubscribe link provided in such messages or through your account settings.
- **Fraud Detection, Prevention, and Security:** To detect, prevent, investigate, and mitigate fraudulent activities, unauthorized access, and other malicious actions; ensure the security and integrity of our Platform, protect our rights and property, and safeguard the personal data of our members.
- **No Further Processing:** NEOPASS will not process or use your personal data for purposes other than those explicitly stated above without obtaining your additional explicit consent, unless such processing is required by applicable law or regulatory obligations

3. Legal Bases for Processing

Our legal bases for processing your data include:

- **Performance of Contractual Obligations:** Processing your personal data is necessary to fulfill our contractual obligations to you, such as managing your membership, processing bookings, facilitating payments, and delivering services you request.
- **Compliance with Legal Obligations:** We process your data when required to comply with applicable legal obligations, such as tax reporting, accounting standards, regulatory requirements (including AML/KYC verification obligations), or when responding to lawful requests from regulatory or governmental authorities.
- **Your Explicit Consent:** We process your personal data based on your explicit consent, primarily for marketing and promotional communications, placing non-essential cookies, and for certain optional services or additional features where consent is legally required. You have the right to withdraw your consent at any time without affecting the lawfulness of prior processing.
- **Legitimate Business Interests:** We may process your personal data based on our legitimate business interests, including improving and optimizing our services, maintaining and enhancing platform security, fraud prevention, analyzing user trends, ensuring the stability and functionality of the Platform, and pursuing other legitimate operational and administrative purposes. We ensure that our legitimate interests are carefully balanced against your rights and freedoms.
- **No Additional Processing:** NEOPASS explicitly commits not to process your personal data for any purpose beyond those explicitly stated above, unless we have obtained your additional explicit consent, or unless we are legally required or permitted by applicable law. Any new purposes or processing activities will be communicated clearly, and appropriate lawful bases established prior to processing

4. Sharing Your Information

We may share your information with:

- **Travel Service Providers (airlines, hotels, consolidators):** We share your personal data such as your full name, passport details, contact information, booking details, and payment information as necessary to facilitate, confirm, and fulfill your travel reservations. Travel providers act as independent controllers once data is shared, and their use of your personal information is governed by their respective privacy policies.
- **Payment Processors and Financial Institutions:** We securely share your payment details and billing information with authorized, PCI DSS-certified third-party payment processors and financial institutions to process your payments and transactions safely. NEOPASS does not store your full payment card details directly on its servers.
- **Regulatory Authorities and Governmental Bodies:** We may disclose your personal data if required by applicable laws, regulations, legal processes, court orders, or in response to legitimate governmental or regulatory inquiries. Such disclosures may occur in cases of fraud investigations, compliance with tax or regulatory reporting obligations, or any lawful request from competent authorities.
- **Third-Party Service Providers (IT, Security, Analytics, Marketing):** We engage reputable third-party vendors to help us operate the NEOPASS Platform effectively and securely. These providers include IT hosting services, cloud storage providers, cybersecurity firms, marketing and advertising agencies, and analytics platforms. Such providers process your personal data strictly on our behalf and under our instructions, and are contractually obligated to protect the confidentiality and security of your data.
- **No Sale or Rental of Personal Data:** NEOPASS explicitly does not sell, rent, or trade your personal data to third parties for their own marketing or commercial purposes. We may share certain data with third-party advertising or analytics partners solely for the purpose of delivering personalized advertising or analyzing Platform usage, as detailed in our Cookie Policy. You have the explicit right to opt out of such sharing or targeted advertising at any time (see our Cookie Policy for opt-out mechanisms).
- **Business Transfers:** If NEOPASS undergoes a merger, acquisition, reorganization, or asset sale, your personal data may be transferred or disclosed to our successor entity, affiliates, or relevant third parties as part of such transactions. In the event of such transfer, your personal data will continue to be protected in accordance with this Privacy Policy, or you will be explicitly notified of any changes to the data practices.

5. Data Transfers and International Data Processing

International Transfers: Due to the global nature of our services, your personal data may be transferred, stored, or processed in countries other than your home jurisdiction, including countries outside the UAE, the European Union (EU), and the United Kingdom (UK). These countries may have data protection laws different from those of your home country.

Adequate Protection Measures: We implement appropriate safeguards to ensure that your personal data remains protected during international transfers, including the use of standard contractual clauses (SCC) approved by the European Commission for transfers from the EU/UK to third countries, contractual obligations with receiving parties ensuring high standards of protection in accordance with UAE PDPL, and any other required measures under applicable privacy laws. We regularly review these safeguards to ensure continued compliance.

Your Explicit Consent to International Transfers: By accessing, registering, or using the NEOPASS Platform, you explicitly acknowledge, consent to, and agree that your personal data may be transferred internationally as described in this Privacy Policy. You understand and accept the inherent risks of such transfers, including the possibility that laws in these countries may differ from your local

data protection standards. If you do not agree to these international transfers, please refrain from using our services

6. Data Retention

We retain personal data only as long as necessary for the purposes outlined or as required by law, including:

- **Transactional Data:** We retain transaction-related information, such as booking records, payment history, invoices, and financial records, for a minimum of five years, in compliance with applicable UAE federal laws, tax regulations, accounting standards, audit requirements, and Meydan Free Zone regulatory obligations.
- **Membership and Account Data:** We retain your personal information related to your membership and account as long as your NEOPASS account remains active. After you close your account, or after a prolonged period of inactivity (e.g., 24 months without login or interaction), we will delete or anonymize your personal data unless we are legally required or permitted to retain certain information (for example, transaction data for compliance purposes, or limited personal information needed to prevent fraud or reactivation abuse).
- **Criteria for Determining Retention Periods:** The exact retention period of your personal data depends on several factors, including applicable regulatory or legal requirements (e.g., tax or financial laws), the duration of any contract or relationship we have with you, potential ongoing legal or regulatory obligations (such as investigations or disputes), and the operational necessity of retaining your data (such as fraud prevention, auditing, or enforcing our Terms & Conditions).
- **Secure Deletion and Anonymization:** Upon expiry of the applicable retention period or when your personal data is no longer necessary for the stated purposes, we will securely delete, destroy, or irreversibly anonymize your data in a manner designed to prevent any future re-identification. Electronic records are securely erased from our databases, backups are purged regularly, and any physical documents (if applicable) are securely destroyed.

7. Your Data Protection Rights

Under applicable laws (GDPR, UAE PDPL, CPRA), you have rights including:

- **Right of Access:** You have the right to request and obtain a copy of the personal data we hold about you.
- **Right to Rectification:** You can request corrections or updates to any inaccurate or incomplete personal data we hold about you.
- **Right to Deletion (Erasure):** You have the right to request the deletion of your personal data, subject to certain legal exemptions (e.g., compliance with legal obligations, completing transactions, or preventing fraud).
- **Right to Restriction of Processing:** You have the right to request that we temporarily restrict the processing of your personal data, for example if you contest the accuracy of your data or object to certain processing activities.
- **Right to Object:** You can object to processing your personal data in certain circumstances, including objecting at any time to processing for direct marketing purposes. Upon receiving an objection, we will cease processing your data for these purposes unless we can demonstrate compelling legitimate grounds or compliance requirements.

- **Right to Data Portability:** You have the right to request a structured, commonly used, and machine-readable copy of your personal data that you have provided to NEOPASS, and, where technically feasible, request us to transmit your data directly to another data controller.
- **Right to Withdraw Consent:** Where the processing of your personal data relies on your explicit consent, you have the right to withdraw your consent at any time. Such withdrawal will not affect the lawfulness of processing carried out prior to your withdrawal of consent. Upon withdrawal, we will stop processing your data for the purposes for which consent was initially obtained, unless there is another legal basis for continuing such processing.

Additional Rights for California Residents (CPRA): If you are a California resident, under the California Privacy Rights Act (CPRA), you additionally have:

- The **Right to Know** about the categories and specific pieces of personal information we collect, disclose, or share about you.
- The **Right to Correct** inaccurate personal data held by NEOPASS.
- The **Right to Opt-Out of the Sale or Sharing** of your personal data (please note NEOPASS does not sell personal data for monetary consideration but may share for cross-context behavioral advertising; you may opt out of such sharing).
- The **Right to Limit Use of Sensitive Personal Information:** You may request us to limit the use or disclosure of your sensitive personal information, where applicable.
- The **Right to Non-Discrimination** for exercising these rights. You may exercise these rights by contacting us as specified below

How to Exercise Your Rights: You can exercise any of the above rights by contacting our privacy team at privacy@neopass.com. Please clearly specify your identity and the specific data protection right you wish to exercise. To ensure your privacy and protect your data, we may need to verify your identity by requesting additional identifying information. We will respond to your request promptly, within the timeframe required by applicable laws (generally within one month under GDPR/PDPL, and within 45 days for CPRA-related requests). In exceptional cases, this period may be extended as permitted by law, and we will inform you accordingly.

8. Security Measures

Technical Security Measures: We employ robust security technologies and procedures to protect your personal data, including secure transmission protocols (such as TLS encryption), strong encryption standards for data at rest, firewall protections, intrusion detection and prevention systems, regular penetration testing, and vulnerability assessments

Organizational Security Measures: Access to your personal data is strictly limited to authorized employees and third-party providers who require access to fulfill their responsibilities. All personnel with access to personal data are bound by confidentiality obligations, regularly trained on privacy and security protocols, and required to adhere strictly to our internal security policies.

Security Disclaimer: While we implement robust and comprehensive measures designed to protect your personal data, no method of transmission or storage of information via the internet is ever completely secure or error-free. Therefore, we cannot guarantee absolute security, despite our best

efforts. In the event of a security incident that affects your personal data, we will notify you and applicable regulators promptly, as required by applicable law.

User Responsibility: You also have a crucial role in protecting your personal data. We urge you to create and maintain strong, unique passwords, never share your login credentials with others, and immediately notify us of any suspected unauthorized access or other security concerns regarding your account. NEOPASS cannot be held responsible for unauthorized access resulting from your failure to follow recommended security practices

9. Cookies and Tracking Technologies

We use cookies and similar tracking technologies to enhance your user experience (e.g., remembering your preferences and login details), to analyze site performance and usage (e.g., Google Analytics cookies), and to support our marketing efforts (e.g., targeted advertising cookies from third-party ad networks). You can manage your cookie preferences by adjusting your browser settings to refuse or delete cookies. Additionally, our Platform provides specific cookie-management tools (such as a cookie consent banner or dedicated cookie settings page). Please note that if you choose to refuse certain cookies, some functionalities of our Platform may become unavailable or may not perform optimally. For comprehensive and detailed information on the specific cookies we use, their purposes, durations, and the third parties involved, please refer directly to our dedicated **Cookie Policy page**. We strongly recommend reviewing our Cookie Policy to fully understand your rights and choices regarding cookies and other tracking technologies.

User Consent for Cookies: When required by applicable laws such as GDPR (Europe), UK GDPR, UAE PDPL, or CPRA (California), we will seek your explicit consent before placing non-essential cookies on your device, such as those used for analytics and targeted marketing. This consent is obtained via a clear and conspicuous cookie banner when you first visit our Platform. You can withdraw your consent or manage your cookie preferences at any time through the cookie settings available on our Platform or via your browser settings

10. Children's Privacy

Our Platform is not intended for children under 18. We do not knowingly collect personal data from minors.

If you are under the age of 18, you must not use the NEOPASS Platform or provide any personal data without the explicit permission and supervision of a parent or legal guardian. Parents or legal guardians are responsible for monitoring the online activities of their children or minors in their care.

If we discover or become aware that we have inadvertently collected personal data from a minor under the age of 18 without appropriate parental or guardian consent, we will take immediate steps to delete such data from our records. If you are a parent or guardian and believe your minor child has provided personal data to NEOPASS, please contact us immediately at privacy@neopass.com so we can promptly remove their information.

Local Legal Age Considerations (UAE): Please be aware that the age of full legal capacity under UAE law is generally 21 years. Individuals aged between 18 and 21 should only use the NEOPASS Platform with explicit parental or legal guardian consent and supervision

11. Updates to This Policy

We may update this Privacy Policy periodically. We will notify you explicitly and prominently of significant or material changes at least thirty (30) days before they take effect, via email sent to your registered email address, or through a clear and prominent notice on our Platform.

Consent for New Data Uses: If the changes to this Privacy Policy introduce new purposes or methods of processing your personal data that require your consent under applicable laws (such as GDPR, UAE PDPL, or CPRA), we will obtain your explicit consent before applying such changes to your data. If you choose not to provide consent, your personal data will continue to be processed in accordance with the version of the Privacy Policy to which you previously agreed.

User Responsibility to Review Policy Updates: We encourage you to regularly review this Privacy Policy to stay informed about our privacy practices. Continued use of our Platform following any updates to this Privacy Policy indicates your explicit acknowledgment and acceptance of the updated terms. If you disagree with any changes, please discontinue use of the Platform and contact us to close your account if necessary

12. Contact Information

For any questions, requests, concerns, complaints, or inquiries related to your personal data, your privacy rights (such as access, rectification, deletion, objection, restriction, portability, or withdrawal of consent), or this Privacy Policy, please contact our Data Protection Officer using the information provided below:

Email: privacy@neopass.com

Address: NEO Pass Group LLC-FZ, Meydan Grandstand, 6th Floor, Meydan Road, Nad Al Sheba, Dubai, UAE.

Identity Verification: For your privacy and security, before responding to your requests related to your personal data, we may need to verify your identity by requesting additional information. This verification ensures that your data is protected and that we respond only to authorized requests.

EU/UK Representative (GDPR Article 27): For users located within the European Union or United Kingdom, NEOPASS has appointed a GDPR representative who you may contact directly for data protection matters:

EU/UK Representative Contact:

Address:

Email:

Response Times: We aim to respond promptly to all privacy-related requests or inquiries. Under normal circumstances, responses will be provided within the timeframe required by applicable law (typically within one month under GDPR and UAE PDPL, and within 45 days for requests governed by CPRA). If additional time is necessary due to complexity or the volume of requests, we will inform you promptly.

Right to Lodge a Complaint: If you believe your privacy rights have been violated or if you are not satisfied with our response to your privacy concerns, you have the right to lodge a complaint with the relevant data protection authority in your jurisdiction (e.g., the supervisory authority under GDPR, the UAE Data Office under PDPL, or the California Privacy Protection Agency under CPRA).

Thank you for trusting NEOPASS with your personal information. We remain fully committed to ensuring your privacy and protecting your personal data in accordance with all applicable laws and regulations.