

## Privacy Policy

Dogan Voyages SARL. (“**we**,” “**us**,” or “**our**”) values your trust and recognizes the importance of protecting your personal information. This Privacy Policy explains how we collect, use, and disclose personal information when you use our platform and services. It also outlines your rights regarding the information we collect and how you can contact us for further assistance.

### Privacy Policy Summary

This section provides a brief overview of our Privacy Policy.

#### What does this Privacy Policy cover?

This Privacy Policy describes:

- **How and what type of personal information we collect and use;**
- **When and with whom we share your personal information;**
- **The choices you can make regarding the collection, use, and sharing of your information;**
- **How you can access and update your personal information.**

#### What personal information do we collect, and how do we collect it?

We collect personal information through the following means:

1. **Information You Provide Directly:** When you create an account, sign up for offers, or book a Hajj or Umrah package, you provide us with your personal details, such as your name, email address, and payment information.
2. **Information We Collect Automatically:** Through technologies like cookies and similar tools (used with your consent where applicable), we automatically gather information about your interactions with our platform, such as browsing behavior, device details, and IP address.
3. **Information from Third Parties:** We may receive personal information from trusted third-party sources that assist us in enhancing our platform and services, maintaining accurate records, detecting and preventing fraud, and improving our marketing strategies.

#### How Is Your Personal Information Shared?

We may share your personal information for the following purposes:

- To facilitate your bookings for Hajj and Umrah packages and related travel services;
- To assist with your travel arrangements or stay;
- To communicate with you, including sending information about our products and services or enabling you to communicate with service providers;
- To comply with applicable legal obligations or respond to lawful requests from authorities.

For more detailed information about how your personal information is shared, please refer to the full Privacy Policy below.

#### What Are Your Rights and Choices?

You have various rights and options to manage your personal data, including:

- **Opting Out of Marketing Communications:** You can unsubscribe from our marketing emails by clicking the “unsubscribe” link included in our communications or managing your preferences in your account.
- **Exercising Data Protection Rights:** You can contact us to access, update, or delete your personal information, or to inquire about the data protection rights available to you under applicable laws.

Please see the full Privacy Policy for comprehensive details about your rights and choices.

## **How to Contact Us**

If you have any questions or concerns about our privacy practices, or if you would like to make a request regarding your personal information, please refer to the “Contact Us” section below. We are here to assist you with any inquiries related to the handling of your personal data.

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# **Privacy Statement**

## **Collection and Use of Your Personal Information**

This section provides details about:

- The types of personal information we collect and use.
- How we collect and use your personal information.
- The purposes for which we collect and use your personal information.
- The lawful basis we rely on to collect and use your personal information.

## **Lawful Bases for Processing**

In accordance with applicable data protection laws, we rely on specific lawful bases to collect and use your personal information. Below is an overview of these lawful bases:

### **1. Consent**

We will process your personal information where you have provided explicit consent. For example, this includes situations where you consent to receive marketing communications or promotional offers from us.

### **2. Legal Obligation**

We may process your personal information when required to comply with legal obligations. For instance, we may need to use your transaction history to fulfill financial and tax reporting requirements under applicable laws.

### **3. Performance of a Contract**

Processing your personal information is necessary to fulfill contractual obligations. Examples include managing your booking, processing payments, or creating an account at your request. If we need your personal information to perform a contract, we will make this requirement clear and explain the consequences of not providing the requested information.

#### **4. Legitimate Interests**

We may process your personal information when it is in our legitimate interests to do so, provided that such interests are not overridden by your data protection rights. Examples of legitimate interests include:

- Operating and improving our platform and services;
- Communicating with you to provide assistance or respond to inquiries;
- Verifying your identity for security purposes when you contact us;
- Detecting or preventing illegal activities, including fraud;
- Conducting marketing activities to promote our services.

While the concept of legitimate interest is explicitly recognized in certain countries and regions, we apply these principles globally, ensuring that our processing activities respect your rights regardless of location.

#### **Categories of Personal Information We Collect and Use**

We collect personal information for the following purposes:

##### **1. Platform Usage and Booking Purposes**

We use your personal information to:

- Facilitate your booking, verify your identity, and process any required travel insurance;
- Book the requested Hajj or Umrah package and associated travel services;
- Provide services related to your booking and account management;
- Create, maintain, and update your user account on our platform and authenticate your identity as a user;
- Maintain records of your search and booking history, travel preferences, and related information about your use of Dogan Voyages' platform and services;
- Enable and facilitate the acceptance and processing of payments, discounts, and other transactions;
- Administer loyalty and rewards programs if applicable;
- Collect and manage reviews related to bookings;
- Enhance your experience by enabling faster access to our services, such as single sign-on features.

##### **2. Communications and Customer Service Purposes**

We use your personal information to:

- Respond to your questions, requests for information, and preferences regarding communication;
- Enable communication between you and service providers (e.g., airlines, hotels, or transportation services);
- Contact you via email, text message, phone, mail, or other communication platforms to provide updates on your bookings, confirmations, or emergency notifications.

##### **3. Marketing Purposes**

We use your personal information to:

- Contact you for marketing purposes, including promotional offers or updates on services;
- Analyze browsing and booking history to optimize marketing and tailor advertisements to your preferences;
- Measure and analyze the effectiveness of marketing campaigns and promotions;
- Administer promotional events like contests or giveaways;
- Deliver targeted advertising based on your preferences, as explained in our Cookie Policy.

#### 4. Market Research, Analytics, and Training Purposes

We use your personal information to:

- Conduct surveys, market research, and data analytics;
- Improve and measure the effectiveness of our platform, services, and tools;
- Monitor and record customer interactions, such as calls or chats, for quality control, training, dispute resolution, and compliance purposes;
- Create aggregated or anonymized data for analysis, which may be shared without restriction where legally permissible.

#### 5. Security and Compliance Purposes

We use your personal information to:

- Promote platform security, verify user identities, and prevent fraud or unauthorized activities;
- Defend against claims, manage risks, and address disputes or liabilities;
- Comply with applicable laws, including anti-terrorism, anti-bribery, customs, immigration, and other due diligence requirements;
- Respond to legal authorities, law enforcement, and other legal processes when required.

#### Categories of Personal Information Collected, Purposes, and Lawful Basis

We collect the following categories of personal information for the purposes outlined below. The lawful basis for processing and sources of personal information are also specified.

Personal Information Category	Purposes for Collection	Sources of Personal Information	Lawful Basis
<b>Government-Issued Identification Data</b> (e.g., passport, driver's license, country of residence, tax identification number)	Platform Usage and Booking Purposes;  Security and Compliance Purposes.	Directly from you;  From third parties, such as service providers or regulatory authorities.	Legal obligation;  Performance of a contract.
<b>Identification Data</b> (e.g., name, username, email address, phone number, home or billing addresses)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;	Directly from you;  Automatically from your device;  From third parties, such as business	Legal obligation;  Performance of a contract;  Legitimate interest;

	Marketing Purposes;  Market Research and Analytics to improve our services;  Security and Compliance Purposes.	partners and service providers.	Consent.
<b>Payment Data</b> (e.g., payment card number, expiration date, billing address, bank account details)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Security and Compliance Purposes.	Directly from you;  From authorized payment processors or financial institutions.	Legal obligation;  Performance of a contract;  Consent.
<b>Travel Preferences</b> (e.g., preferred destinations, special dietary needs, or accommodation preferences)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Market Research and Analytics to improve our services.	Directly from you;  Automatically from your device;  From third parties, such as business partners and service providers.	Legitimate interest;  Consent.
<b>Loyalty Data</b> (e.g., loyalty program membership, points balance, and status)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Market Research and Analytics to improve our services.	Directly from you;  Automatically from your device;  From third parties, such as business partners and service providers.	Legal obligation;  Performance of a contract;  Consent.
<b>Geolocation Data</b> (e.g., inferred location from IP address or exact location with consent)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Security and Compliance Purposes.	Directly from you;  Automatically from your device;  From third parties, such as business partners and service providers.	Legal obligation;  Legitimate interest;  Consent.

<b>Images, Videos, and Recordings</b> (e.g., photos you upload or facial photographs)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Security and Compliance Purposes.	Directly from you;  From third parties, such as business partners and service providers.	Performance of a contract;  Consent.
<b>Communications With Us</b> (e.g., emails, chats, call recordings)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Security and Compliance Purposes.	Directly from you.	Legal obligation;  Performance of a contract;  Legitimate interest.
<b>Site Interaction Data</b> (e.g., searches, transactions, and clicks on our platform)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Security and Compliance Purposes.	Automatically from your device;  From third parties.	Legal obligation;  Legitimate interest;  Consent.
<b>Device Data</b> (e.g., device type, unique identifiers, operating system)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Security and Compliance Purposes.	Automatically from your device;  From third parties.	Legal obligation;  Legitimate interest;  Consent.

<b>Friends and Co-Traveler Data</b> (e.g., information about your travel companions)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Security and Compliance Purposes.	Directly from you;  From third parties.	Performance of a contract;  Legitimate interest;  Consent.
<b>Child Data</b> (e.g., name and contact details of minor travelers provided by their guardian)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Security and Compliance Purposes.	Directly from you;  From third parties.	Performance of a contract;  Consent (from a parent/guardian).
<b>Clickstream Data</b> (e.g., actions performed on the platform)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Security and Compliance Purposes.	Automatically from your device;  From third parties.	Legitimate interest;  Consent.
<b>Birthdate and Gender</b> (e.g., exact birthdate or approximate age bracket and gender)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Marketing Purposes;  Security and Compliance Purposes.	Directly from you;  From third parties.	Legal obligation;  Performance of a contract;  Legitimate interest;  Consent.

<b>Sensitive Data</b> (e.g., racial origin, religious beliefs, health information)	Platform Usage and Booking Purposes;  Communication and Customer Service Purposes;  Security and Compliance Purposes.	Directly from you.	Legal obligation;  Consent.
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### Sharing of Personal Information

We share your personal information as described below, in this Privacy Policy, and as permitted by applicable law.

Recipient of Personal Information	Purpose Category
<b>Internal Teams:</b> Dogan Voyages teams and authorized staff.	<ul style="list-style-type: none"> <li>- Platform Usage and Booking Purposes</li> <li>- Communications and Customer Service Purposes</li> <li>- Marketing Purposes</li> <li>- Market Research, Analytics, and Training Purposes to improve our services</li> <li>- Security and Compliance Purpose</li> </ul>
<b>Third-Party Service Providers:</b> Partners assisting with operational needs, such as hosting platforms, payment processors, or customer support tools.	<ul style="list-style-type: none"> <li>- Platform Usage and Booking Purposes</li> <li>- Communication and Customer Service Purposes</li> <li>- Marketing Purposes</li> <li>- Market Research, Analytics, and Training Purposes</li> <li>- Security and Compliance Purposes</li> </ul>
<b>Travel Suppliers:</b> Travel-related suppliers such as hotels, airlines, insurance providers, car rental services, and transportation companies.	<ul style="list-style-type: none"> <li>- Platform Usage and Booking Purposes</li> <li>- Communication and Customer Service Purposes</li> <li>- Market Research and Analytics to improve services.</li> </ul>
<b>Business Partners:</b> Companies collaborating with Dogan Voyages on offers, marketing campaigns, or joint services.	<ul style="list-style-type: none"> <li>- Platform Usage and Booking Purposes</li> <li>- Communication and Customer Service Purposes</li> <li>- Marketing Purposes</li> <li>- Market Research and Analytics to improve our services.</li> </ul>
<b>Targeted Advertising Partners:</b> Third-party marketing partners assisting with targeted advertising.	<ul style="list-style-type: none"> <li>- Marketing Purposes</li> <li>- Market Research, Analytics, and Training Purposes to improve our services.</li> </ul>
<b>Social media and Online Platforms:</b> Media agencies, social platforms, and search engines assisting with targeted marketing.	<ul style="list-style-type: none"> <li>- Marketing Purposes</li> <li>- Market Research, Analytics, and Training Purposes to improve our services.</li> </ul>
<b>Other Third Parties:</b> Partners you interact with, such as single sign-on providers (e.g., social media logins) or other service integrations.	<ul style="list-style-type: none"> <li>- Marketing Purposes</li> <li>- Market Research, Analytics, and Training Purposes to improve our services.</li> </ul>
<b>Recipients in Relation to Legal Rights and Obligations:</b> Regulatory authorities, tax agencies, or legal representatives.	<ul style="list-style-type: none"> <li>- To comply with tax, regulatory, or legal requirements</li> <li>- To enforce our policies, protect our property or interests, and respond to subpoenas or other legal requests.</li> </ul>



<b>Recipients in Relation to Corporate Transactions:</b> Entities involved in mergers, acquisitions, or similar business transactions.	<ul style="list-style-type: none"> <li>- Security and Compliance Purposes</li> <li>- To facilitate corporate transactions, such as mergers, divestitures, or asset sales, ensuring compliance with the disclosures in this Privacy Policy.</li> </ul>
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## Joint Use of Your Personal Information

Dogan Voyages may jointly use your personal information with affiliated entities and trusted partners, adhering to data protection laws. This includes:

- Processing all categories of personal information listed in the **Categories of Personal Information We Collect and Use** section for the purposes outlined, including booking, marketing, and compliance.
- Collaborating with third-party service providers, travel suppliers, and technology partners to deliver and improve our services.
- Sharing data within Dogan Voyages' internal teams or affiliates, where necessary, for operational purposes.

Dogan Voyages remains the principal entity responsible for managing your personal information in accordance with this Privacy Policy. For more details or inquiries about joint use, refer to the **Contact Us** section below.

## Our Use of Artificial Intelligence

We use artificial intelligence (AI) and machine learning to enhance your experience, streamline operations, and secure our platform. Specific uses include:

- **Personalization:** Recommending destinations, activities, and properties based on your preferences.
- **Optimization:** Determining sort orders, flight price insights, and real-time alerts for travel options.
- **Content Screening:** Ensuring uploaded materials (e.g., property images) meet quality standards and accurately reflect amenities.
- **Review Moderation:** Screening reviews to identify and remove sensitive personal data and assess customer satisfaction.
- **Fraud Prevention:** Detecting breaches of terms and fraudulent activities.
- **Language Adaptation:** Displaying content and virtual agent interactions in your preferred language and dialect.

## Automated Decision-Making

Some processes involve automated decisions, such as sorting travel options or identifying potential fraud. However, we ensure that significant decisions with legal or personal impact will not rely solely on automated systems unless:

1. You have explicitly consented to such processing.
2. It is necessary for a contract's performance.
3. It is permitted by applicable law.

You have the right to:

- Request manual review of automated decisions.

- Contest decisions made solely by automated processing.

For further details, refer to the **Your Rights and Choices** section.

## **Your Rights and Choices**

You have specific rights concerning your personal information, depending on applicable laws. These include:

### **General Rights**

1. **Access and Correction:**
  - Access your personal information at any time.
  - Correct or update inaccuracies by logging into your account or contacting us directly.
2. **Deletion:**
  - Request deletion of your personal information unless retention is required by law.
3. **Communication Preferences:**
  - Opt out of marketing emails by clicking “unsubscribe” or adjusting preferences in your account.
  - Control notifications through mobile app or device settings.
4. **Consent Management:**
  - Withdraw consent for data processing.
  - Note: Withdrawal does not affect processing conducted before consent was withdrawn or where processing is based on legal grounds other than consent.

### **Additional Rights Based on Jurisdiction**

Depending on your region, you may also:

- Request a copy of your personal information.
- Object to or restrict certain data processing activities.
- Opt out of the sale of personal information, if applicable.
- Request details about automated decision-making processes and outcomes.
- Contest decisions made solely by automated processing or request a manual review.

For further assistance, contact us via the details in the **Contact Us** section.

### **International Data Transfer**

Your personal information may be processed, transferred, or stored in countries with data protection laws differing from your jurisdiction. Key practices include:

- **Data Transfer Mechanisms:** Compliance with applicable regulations, including standard contractual clauses and adequacy decisions where relevant.
- **Safeguards:** Ensuring third-party service providers meet stringent data protection standards through binding agreements.
- **Global Operations:** Data may be accessed by authorized employees or affiliates worldwide to facilitate services.

These measures ensure your personal information is handled securely and in compliance with applicable data protection laws.

## Data Security

Dogan Voyages implements robust measures to protect your personal information, including:

- **Encryption:** Data is encrypted during transmission and storage to prevent unauthorized access.
- **Access Controls:** Only authorized personnel with a legitimate need can access sensitive information.
- **Technology Standards:** Regular updates to security protocols, including multi-factor authentication and VPNs.
- **Employee Training:** Staff undergo regular training on data privacy and cybersecurity best practices.

## Incident Response

In the event of a data breach, we will:

1. Notify affected individuals promptly in accordance with applicable laws.
2. Inform regulatory authorities as required.

## Minors

Our platform is not directed at minors. However, we may collect personal information for minors under limited circumstances, such as:

- During trip reservations or family-focused travel services.
- With explicit consent from a parent or guardian.

## Protection of Minors' Data

We adhere to strict principles of transparency, necessity, and security when handling minors' data. Parents or guardians may request access, correction, or deletion of minors' personal information by contacting us directly.

## Record Retention

We retain your personal information as long as necessary to fulfill the purposes outlined in this Privacy Policy, or as required by law. Retention criteria include:

- **Legal Obligations:** Compliance with tax laws, regulatory requirements, and litigation holds.
- **Business Needs:** Supporting secure backups and historical trend analysis.

## Deletion and Anonymization

When retention periods expire:

- Personal data is securely deleted using industry-standard methods.
- Residual data in backups is inaccessible and will be removed upon restoration.

## Contact Us

For questions about this Privacy Policy, your rights, or requests related to your personal information, you can:

- **Submit Requests:** Through the Privacy Section on our website.
- **Contact Our Team:** Reach out via email or the contact information provided in your account documentation.

Dogan Voyages will respond promptly to all inquiries, ensuring compliance with applicable data protection laws.

### **Updates to Privacy Policy**

We may update this Privacy Policy to reflect changes in laws, regulations, or business practices.

- **Effective Date:** The “Last Updated” date at the top of this page reflects the most recent changes.
- **Notification:** Significant changes will be communicated via updates on our website or other direct methods where necessary.

## Cookie Statement

Whenever you use our online services or apps, Dogan Voyages utilizes cookies and other online tracking technologies (collectively referred to as “**cookies**” in this statement) to enhance your experience.

Cookies may serve various purposes, such as ensuring the functionality of the Dogan Voyages website, analyzing traffic, or providing tailored advertisements.

This Cookie Statement explains:

- **What cookies and tracking technologies are**
- **How they are used**
- **Your choices regarding their use**

### What Are Cookies and Tracking Technologies?

Cookies are small text files placed in your browser or on your device when you visit a website. These files store data about your interactions and preferences, enabling the website to recognize your device and enhance your experience.

Cookies can be categorized as follows:

- **First-party cookies:** Set directly by Dogan Voyages to manage your experience on our platform.
- **Third-party cookies:** Set by trusted partners such as advertising networks, social media platforms, and analytics providers to support additional features or functions.

Cookies can also be:

- **Session cookies:** Temporary files that expire when you close your browser.
- **Persistent cookies:** Files that remain on your device for a specified duration, even after the browser is closed.

In addition to cookies, Dogan Voyages employs similar technologies, such as:

- **Web beacons:** Tiny image files or code snippets embedded in emails or websites to monitor activity, such as whether an email was opened or a webpage was visited.
- **Scripts:** Small programs that provide additional functionality, such as enabling interactive features or collecting analytics data.
- **Tracking URLs:** Links with unique identifiers used to trace the source of visits to our platform, such as from search engines or affiliate websites.
- **Software Development Kits (SDKs):** Embedded tools in our apps that track in-app activities, deliver personalized notifications, and analyze user behavior.

For the purposes of this Cookie Statement, all these technologies are collectively referred to as “**cookies**”.

## **How Are Cookies Used?**

Cookies collect various types of information, such as:

- IP address and device ID
- Browser type and operating system
- Pages viewed and features used
- Timestamp and referral URL
- Response to advertisements

They enable Dogan Voyages to recognize your device across multiple visits, devices, or platforms, and serve three primary purposes:

### **1. Functional Cookies**

These cookies are essential for the operation of our website and apps. They:

- Ensure the website functions properly, allowing you to create accounts, log in, and manage bookings.
- Save your preferences, such as language, currency, and past searches.
- Enable secure access and navigation through the platform.

### **2. Analytical Cookies**

Analytical cookies help us understand how users interact with our platform, enabling us to:

- Improve our website, apps, and communications.
- Analyze the effectiveness of advertisements and marketing campaigns.
- Monitor browsing behavior, such as clicks, searches, and time spent on pages.

### **3. Marketing Cookies**

Marketing cookies allow Dogan Voyages and trusted partners to provide personalized content and advertisements by:

- Categorizing users based on interests and browsing behavior.
- Displaying tailored travel recommendations or offers on our platform and third-party websites.
- Supporting retargeting campaigns that encourage users to revisit our platform.

Marketing cookies may also integrate social media features, such as "like" or "share" buttons. These features may collect data to create a profile of your online behavior for personalized advertisements.

## **Non-Cookie Tracking Technologies – Email Pixels**

In addition to cookies, we may use pixels embedded in emails to track your engagement. For example, pixels can tell us if an email was opened, when it was read, and which links were clicked. This helps us optimize future communications.

## **What Are Your Choices?**

You have control over cookies and tracking technologies. Here's how you can manage them:

### **Browser Settings**

Most browsers allow you to block or delete cookies. Refer to the help section of your browser for guidance:

- Chrome Cookie Settings
- [Firefox Cookie Settings](#)
- [Safari Cookie Settings](#)

Blocking certain cookies may limit functionality on the Dogan Voyages platform.

### **Analytics Opt-Out**

You can opt out of Google Analytics by installing the Google Analytics Opt-Out Browser Add-On.

### **"Do Not Track" Signals**

Currently, Dogan Voyages does not support "Do Not Track" browser settings.

This Cookie Statement ensures transparency about how Dogan Voyages collects and uses cookies to improve your experience. For further information, contact us via the **Contact Us** on our website.