

UPDATED TERMS OF SERVICE

We've recently updated our Terms of Service and Privacy Policy. If you signed up for an account prior to 25 May, 2018, we'll ask you to agree to the new Terms of Service and Privacy Policy when you use Air Translator on or after 25 May, 2018; our previous Terms of Service and Privacy Policy would continue to apply to you until 25 May, 2018. The updated Privacy Policy will automatically come into effect for all existing users on May 25, 2018. Your use or continued use of the Air Translator Platform from this date on will be subject to the new Privacy Policy. Please read these Terms carefully. If you signed up for an account on or after 25 May, 2018, the updated Terms apply to you.

AIR TRANSLATOR PRIVACY POLICY

Last updated: 25 May, 2018

Thank you for taking the time to read Air Translator's Privacy Policy! We appreciate that you put your trust in us when you provide us with your information and we take this seriously. This Privacy Policy is for you to understand the information we collect, why we collect it, how it is used, in connection with your access to and use of the Air Translator Platform. This Policy describes our privacy practices in plain language, keeping legal and technical jargon to a minimum.

If you see an undefined term in this Privacy Policy (such as "Language Listing" or "Air Translator Platform"), it has the same definition as in our Terms of Service.

When this policy mentions "Air Translator", "us," or "our," it refers to the Air Translator that is responsible for your information under this Privacy Policy (the "**Data Controller**").

- If your Country of Residence is the United Kingdom the Data Controller is Air Translator Ltd.
- If your Country of Residence is China, the Data Controller is Air Translator (Beijing) Technology Ltd. ("**Air Translator China**" or "**空中传译**"), except where you book a Translation Session located outside of China or create a Language Listing located outside of China, in which case the Data Controller is Air Translator Ltd. for that session and transaction.

1. INFORMATION WE COLLECT

1.1 Information You Give Us

1.1.1 Information that is necessary for the use of the Air Translator Platform and Service

We ask for and collect the following personal information about you when you use the Air Translator Platform. This information is necessary for the adequate performance of the contract between you and us and to allow us to comply with our legal obligations. Without it, we may not be able to provide you with all the requested services. This includes:

- **Account Information.** When you create your account, you provide us with your login credentials, such as email address, name, password, and date of birth.
- **Profile and Language Listing Information.** To use certain features of the Platform (such as making an on-site session or creating a Linguist Profile), we may ask you to provide additional information, which may include your address, phone number, and a profile picture.
- **Identity Verification Information and Document.** To help create and maintain our trusted community, we may collect identity verification information (such as images of your government issued ID, passport, national ID card, or driving license, and language certification, language test transcript permitted by applicable laws) or other authentication information when you use certain features including booking for an on-site service, and signing up as a Linguist.
- **Payment Information.** To use certain features of the Platform (such as booking or creating a Linguist Profile), we may require you to provide certain financial information (like your bank account or credit card information) in order to facilitate the processing of payments.
- **Communications with Air Translator and other Members.** When you communicate with Air Translator or use the Platform to communicate with other Members, we collect information about your communication and any information you choose to provide.

1.1.2 Information you choose to give us

You choose to give us certain information when using our services. This includes:

- **Additional Profile Information.** You may choose to provide additional information as part of your Profile (such as city and country).
- **Payment instrument instruction.** You may choose to provide payment instrument (“payment method”) information as part of your Account including preferred payment method and currency.
- **Customer Service Communications.** If you contact our customer service team, we collect the information you give us during the interaction.
- **Other Information.** You may otherwise choose to provide us information when you fill in a form, conduct a search, update or add information to your profile, respond to surveys, share content about your use of our services with your connections or through your social network, participate in promotions, or use other features of the Platform.

1.2 Information We Collect From Your Use of the Platform

- **Usage Information.** We collect information about your activity on our Platform such as the pages or content you view, your searches for Linguists, bookings you have made, short input text and voice, and other actions on the Air Translator Platform.
- **Log Data and Device Information.** We collect log data and device information when you access and use the Platform. This information includes, among other things: details about how you’ve used the Platform (including if you clicked on links to third-party applications), IP address, access dates and times, hardware and software information, device information, device event information, unique identifiers, crash data, cookie data, and the pages you’ve viewed or engaged with before or after using the Air Translator Platform.
- **Geo-location Information.** When you use certain features of the Platform, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device’s GPS. You should be able to manage or disable the use of location service for individual application with most mobile devices.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. We may also allow our business partners to use these tracking technologies on the Platform, or engage others to track your behaviour on our behalf. While you may disable the usage of cookies through your browser settings, our Platform currently does not respond to a “Do Not Track” signal in the HTTP header from your browser or mobile application due to lack of standardisation regarding how that signal should be interpreted.
- **Payment Transaction Information.** We collect information related to your payment transactions, including the payment instrument used, date and time, payment amount, payment instrument expiration date and billing postcode, PayPal email address, Alipay and WeChat Pay number, IBAN information, your address, and other related transaction details.

1.3 Information We Receive From Third Parties

In addition to the information you provide us directly, we may collect information, including personal information, that others provide about you when they use the Air Translator Platform, or obtain information from other sources and combine that with information we collect through the Platform. We do not control, supervise or respond for how the third parties providing your information process your personal data, and any information request regarding the disclosure of your personal information to us should be directed to such third parties. We receive information about you from others, including:

- **Third-party Services.** If you link, connect, or login to your Air Translator Account with a third-party service (such as social media: Google, Facebook, WeChat), the third-party service may send us information such as your registration and profile information from that service. This information varies and is controlled by that service or as authorised by you via your privacy settings at that service.
- **Other Sources.** We may receive information about you from our partners, for instance where iTranslate ads are published on a partner’s website or platform (in which case they may pass along details on a campaign’s performances).

2. HOW WE USE INFORMATION

We use, store, and process information mentioned in the section above to provide, understand, improve, and develop the Air Translator Platform, to create and maintain a trusted and safer environment and comply with our legal obligations, and to communicate with you.

2.1 To Provide, Understand, Improve, And Develop The Platform

- Identify, establish and manage your account and our relationship with you.
- Provide you with customer support and respond to your requests
- Send you service or support messages, updates, security alerts, and account notifications.
- To ensure a consistent experience across your devices if applicable, including iOS and Android devices. For this purpose, we may use and combine your personal information which we collect across different Air Translator services used by you.
- If you provide us with your contacts’ information, we may process this information: 1) to facilitate your referral invitations, 2) send your requests for references, 3) for fraud detection and prevention, and 4) for any for customised marketing purposes.
- To operate, protect, improve, and optimise the Platform and user experience, such as making Linguist and Event suggestions, or ranking search results, we conduct profiling based on your interactions with the Platform, your search and booking history, your profile information and preferences, and other content you submit to the Platform.

2.2 To Create And Maintain A Trusted And Safer Environment

- Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity.
- Perform data analysis to better understand and design countermeasures against these activities.
- Retain data related to fraudulent activities to prevent against recurrences
- Resolve any disputes with any of our Members and enforce our agreements with third parties.
- Verify or authenticate information or identifications provided by you (such as to verify your Language Certificates or compare your identification information and photo to another document you provide).
- Comply with our legal obligations
- Assist law enforcement
- Enforce our Terms of Service.

We process this information given our legitimate interest in protecting the Platform, to provide our service to you, and to comply with applicable laws. From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time where indicated in the services or by contacting us at the address provided at the end of this Privacy Policy.

2.3 To Improve And Serve Personalised Marketing and Advertising

- Send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your preferences (including information about Air Translator or partner campaigns and services) and social media advertising through social media platforms (such as Facebook or WeChat).
- Administer referral programs and promotional activities or events sponsored or managed by Air Translator or its third-party partners.
- For the purposes of European law, these ad partners are independent controllers of your information, which means that they are responsible for providing and complying with their own policies relating to any personal information they obtain in connection with the services.

We will process your personal information for the purposes listed in this section given our legitimate interest in undertaking marketing activities to offer you products or services that may be of your interest. You can opt-out of receiving marketing communications from us by following the unsubscribe instructions included in our marketing communications or contact our customer service in-app or via email.

2.4 To Communicate With You

- With your consent, to send you email marketing in order to provide you with information about services that you may find of interest.
- To send you non-marketing emails or messages, such as those related to transactions, your account, security, or product changes. Examples of service-related messages include an email address confirmation/welcome email when you register your account, service availability, modification of key features or functions and correspondence with our customer service team.

3. HOW WE SHARE INFORMATION

3.1 Sharing Between Members

To help facilitate Linguist or Events bookings ,or other interactions between Members, we may need to share certain information with other Members, as it is necessary for the adequate performance of the Platform. This includes:

- When you use the Air Translator Platform and Services as a User requiring a booking, certain information about you is shared with the Linguist, including your full name, profile picture, the full name of any additional Guests, your cancellation history, and other information you agree to share.
- When you use the Air Translator Platform and Services as a Linguist, when you have a confirmed booking, certain information is shared with the User to coordinate the booking, such as your full name, phone number, and location information.
- When you as a use the Air Translator Platform and Services as a User and invite additional Guests to a booking, your full name, travel dates, Event details, and other related information will be shared with each additional Guest.

3.2 Profiles, Language Listings, And Other Public Information

- Part of your Profile Page and Language Listing, such as your name, description, and public profile picture are publicly visible to others.
- When you use the Air Translator Platform and Services as a Linguist, your Language Listing pages are publicly visible and include information such as your language skills, description, calendar availability, your public profile picture, reviews and ratings are also part of your public profile page by users who previously completed translation sessions with you, and any additional information you choose to share.

Based on our legitimate interest to promote the Air Translator Platform we may display parts of our platform (such as Events and Linguist Language Listing pages) on sites operated by Air Translator's business partners, using technologies such as widget or APIs. If such case applies to you, information from your public profile page may also be displayed.

3.3 When required by law

Air Translator may disclose your information, including personal information, to courts, law enforcement or government authorities, or authorised third-parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to to comply with legal process and to respond to claims asserted against Air Translator; (iii) to assist in the prevention or detection of crime or suspected illegal activity or any other activity that may expose us, you, or any other of our Platform's users to legal liability (subject in each case to applicable law); (iv) to enforce and administer our Terms of Service and Privacy Policy; or (v) to protect the rights, property or safety of Air Translator, its employees, Members, or members of the public

Where appropriate, we may notify Members about legal requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon Air Translator's property, our Members, and our Platform. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that Member about the request after the fact where appropriate and where we determine in good faith that we are no longer prevented from doing so.

3.4 Service Providers

Air Translator Platform uses a variety of third-party services provider to help us provide services related to our Platform, and this is in order to ensure the adequate service we provide to you. Service providers may be located within or outside the European Economic Area ("EEA"). In particular, our service providers are based in Europe and Asia. For example, service providers may help us: (i) verify Linguists language level; (ii) perform product development, maintenance and debugging; (iii) provide customer service, advertising, messaging, or payment services; or (iv) allow the provision of Air Translator Services through third-party platforms and software tools (e.g. through the integration with our APIs). These providers have limited access to your information to perform these tasks on Air Translator's behalf, and are contractually bound to protect and to use it only for these purposes for which it was disclosed and consistent with this Privacy Policy.

3.5 Corporate Affiliates

Sharing with China. Even if your country of residence is not China, to enable or support Air Translator in providing our services, we may share your information, including personal information, within our corporate of companies (both financial and non-financial entities) that are related by common ownership or control, and this is currently Air Translator (Beijing) Technology Ltd.

The data sharing is necessary for the performance of the Platform and for the services we provide you in China and communicate with Members in China. When required under law and you have expressly granted permission, Air Translator China may disclose your information to Chinese government agencies without further notice to you. We will notify you in advance in specific situations where we apply any practices that differ from what is described in the Privacy Policy (including practices pertaining to disclosures to government agencies).

We also share your information, including personal information, with our corporate affiliates in order to integrate, promote, and improve our Platform and our affiliates' services.

3.6 Corporate transactions

We may transfer or share some or all of our asset, including your information in connection with corporate transactions or in contemplation of such transaction if we are involved, whether in whole or in part, in a merger, sale of assets, acquisition, divestiture, restructuring, reorganisation, dissolution, bankruptcy or other change of ownership or control.

3.7 Aggregated Data

We may also share aggregated information about Air Translator users that it no longer identifies or references an individual user and other anonymised information for regulatory compliance, industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

4. OTHER INFORMATION

4.1 Your Communications

We may review, scan, or analyse your communications on the Air Translator Platform for fraud prevention, risk assessment, regulatory compliance, Members privacy protection, investigation, product development, research, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyse messages to mask contact information. In some cases, we may also scan, review, or analyse messages to debug, improve, and expand product offerings. We use automated methods where reasonably possible.

However, occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyse your communications to send third-party marketing messages to you, and we will not sell reviews or analyses of these communications.

These activities are carried out based on Air Translator's legitimate interest in ensuring compliance with applicable laws and our Terms of Service, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.

4.2 Linking Third-party Accounts

You may link your Air Translator Account with your account at a third-party social networking service. Your contacts on these third-party services are referred to as "Friends." When you create this link:

- some of the information you provide to us from the linking of your accounts may be published on your Air Translator Account profile;
- your activities on the Air Translator Platform may be displayed to your Friends on the Air Translator Platform and/or that third-party site;
- the information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes; and
- the publication and display of information that you provide to Air Translator through this linkage is subject to your settings and authorisations on the Air Translator Platform and the third-party site.

4.3 Maps

Parts of the Air Translator Platform use Google Maps/Earth services, including the Google Maps API(s), and AutoNavi if you use Air Translator Platform services in China. Use of Google Maps/Earth and AutoNavi are subject to their Additional Terms of Use and the Privacy Policy of both map service providers.

5. THIRD-PARTY PARTNERS & INTEGRATIONS

The Air Translator Platform may contain links to third-party websites or services, such as third-party integrations, co-branded services, or third-party branded services ("**Third-party Partners**"). Air Translator doesn't own or control these Third-party Partners and when you interact with them, you may be providing information directly to the Third-party Partner, Air Translator, or both. These Third-party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

6. CROSS-BORDER DATA TRANSFERS

Sharing of information laid out above may involve cross-border data transfers. The United States, European Economic Area ("EEA") Member States, and other countries all have different laws. When your information is moved from your home country to another country, the laws and rules that protect your personal information in the country to which your information is transferred may be different from those in the country of your residence.

The European Commission has adopted standard contractual clauses (also known as Model Clauses), which provide safeguards for personal information that is transferred outside of the EEA. We use these Model Clauses or other suitable safeguards (such as EU-US Privacy Shield to send personal information to some of our third party service providers in the United States, where they are certified to receive such information under the Privacy Shield Program, please visit <https://www.privacyshield.gov/> for further information) to permit data transfers from the EEA to other countries.

7. YOUR RIGHTS

You may exercise any of the rights described in this section before your applicable Air Translator Data Controller by sending an email to admin@airtranslator.com. Please note that this is subject to identity verification before we take further action on your request.

Depending on your location you may have some or all of the following rights in relation to how we use your personal information:

- **Access And Portability:** you may request access to your personal information held by us and receive copies of it in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider where technically feasible.
- **Correction:** you may have inaccurate/incomplete personal information corrected and updated;
- **Consent Management:** where you have provided your consent to the processing of your personal information by Air Translator you may withdraw your consent at any time. We rely on consent to process your personal data, you may withdraw consent at any time. The withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal.
- **Objection, Limit Or Restrict To Processing:** You can ask us to stop the processing of your personal information by Air Translator using all or some of your personal information or to limit our use of it, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal

information; or (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims. If you object to such processing Air Translator will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims. Where your personal information is processed for direct marketing purposes, you may, at any time ask Airbnb to cease processing your data for these direct marketing purposes by managing your preference through the unsubscribe link in one of our newsletters.

- **Data Retention And Deletion:** If you no longer want us to use your information to provide our Platform to you, you can request that we erase your personal information and close your Air Translator Account. We will honour such requests except for circumstances that: (i) we may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety. For example, if we suspend an Air Translator Account for fraud or safety reasons, we may retain certain information from that Air Translator Account to prevent that Member from opening a new Air Translator Account in the future; (ii) We may retain and use your personal information to the extent necessary to comply with our legal obligations; (iii) Information you have shared with others (e.g., Reviews) may continue to be publicly visible on the Platform. However, attribution of such information to you will be removed. Additionally, some copies of your information (e.g., log records) may remain in our database, but are disassociated from personal identifiers; and (iv) Because we maintain our Platform to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

8. CHILDREN'S PRIVACY

Our services are intended for general audiences over the age of 13 years old (or over the age of 16 if you are resident in the EEA, or over the age of 18 if you are resident in China). We do not knowingly collect information from children under the age of 13 years old, or 16 years old in the EEA, or 18 years old in China. If you are not over 13 years old (or 16 years old in the EEA, 18 years old in China) please do not download or use our Platform or Services. If you believe that we may have personal information from or about a child under the age of 13 years old (or under the age of 16 if you are resident in the EEA, or under the age of 18 if you are resident in China), please contact us at admin@airtranslator.com and we will promptly delete that personal information.

9. HOW WE PROTECT YOUR INFORMATION

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and after it is received. Your Air Translator Account information is protected by a password. We try our best to protect you from unauthorised access to or alteration, disclosure or destruction of your personal information. As with all technology companies, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information will always remain secure. We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, technical and organisational security measures.

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify us immediately at admin@airtranslator.com.

10. CHANGES TO THIS PRIVACY POLICY

Air Translator reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the Air Translator Platform and update the "Last Updated" date at the top of this Privacy Policy. We will notify you of any material changes so that you have time to review the changes. If you do not cancel your Air Translator Account before the date the revised Privacy Policy becomes effective, your continued access to or use of the Air Translator Platform will be subject to the revised Privacy Policy.

11. CONTACT US

If you have questions about this Privacy Policy, You may contact us

By email: admin@airtranslator.com,

By post:

Air Translator
41 Corsham Street,
London N1 6DR
United Kingdom

If you live in China:

By email: admin@airtranslator.com

By post: 中国北京市朝阳区三元桥时间国际A座2层 100028 (2F-A, Shijian Guoji, Sanyuan Qiao, Chaoyang District, Beijing, China).

AIR TRANSLATOR PRIVACY POLICY

Last updated: 01 August, 2016

Air Translator (hereinafter referred to as "Air Translator", "we", "us" or "our") operates a mobile application and community marketplace that helps people form online translation relationships directly with one another, where they can find, list, and book translation services of any language around the world through our mobile application ("**Platform**"). Air Translator refers to Air Translator Ltd. and Air Translator (Beijing) Technology Ltd.

This Privacy Policy is intended to inform you about the binding legal rights and obligations between you and Air Translator the Platform. "User" means a person who registers, accesses, or uses the Platform. We reserve the right to modify the Agreement at any time and without prior notice. If you do not agree to any part of this Privacy Policy, we cannot provide the Platform or Service to you, and you should stop using the Platform and deactivate your account with Air Translator. You can find out more about how to deactivate your account via contacting our customer services.

DEFINITIONS

"**Aggregated Information**" means information about all of our users or specific groups or categories of users that we combine together so that it no longer identifies or references an individual user.

"**Data Controller**" means Air Translator, the company responsible for the use and processing of Personal Information.

"**Personal Information**" means information relating to a living individual who is or can be identified either from that information or from that information in conjunction with other information that is in, or is likely to come into, the possession of the Data Controller.

PERSONAL INFORMATION GATHERED BY AIR TRANSLATOR

1. Information that you provide us

We receive, store and process information that you make available to us when accessing or using our Platform and Services. Examples include when you:

1. fill in any form on the Platform, such as when you register or update the details of your user account, or when you supply language verification information;
2. access or use the Platform, such as to search for or list your languages, make, accept, or pay for translation requests, post comments or reviews, or communicate with other users;
3. link your account on a third-party site (e.g. Facebook, WeChat) to your Air Translator account, in which case we will obtain the Personal Information that you have provided to the third-party site, to the extent allowed by your settings with the third-party site and authorised by you; and
4. communicate with Air Translator.

2. Log Data

We may also receive, store and process Log Data, which is information that is automatically recorded by our servers whenever you access or use the Platform, regardless of whether you are registered with Air Translator or logged in to your Air Translator account, such as your IP Address, the date and time you access or use the Platform, the hardware and software you are using, referring and exit pages and URLs, the number of clicks, pages viewed and the order of those pages, and the amount of time spent on particular pages.

3. Third-party social plugins

Our Platform may use social plugins which are provided and operated by third-party companies, such as Facebook and WeChat log in.

As a result of this, you may send to the third-party company the information that you are viewing on a certain part of our Platform. If you are not logged into your account with the third-party company, then the third-party may not know your identity. If you are logged into your account with the third-party company, then the third-party may be able to link information about your visit to our Platform to your account with them. Similarly, your interactions with the social plugin may be recorded by the third-party.

Please refer to the third-party's privacy policy to find out more about its data practices, such as what data is collected about you and how the third-party uses such data.

HOW AIR TRANSLATOR USES AND PROCESS THE INFORMATION THAT YOU PROVIDE OR MAKE AVAILABLE

We do not store credit card details nor do we share customer financial details with any 3rd parties. We use, store and process Information about you for the following general purposes:

1. to enable you to access and use the Platform;
2. to operate, protect, improve and optimise the Platform, Air Translator's business, and our users' experience, such as to perform analytics, conduct research, personalise or otherwise customise your experience, and for advertising and marketing;
3. to help create and maintain a trusted and safer environment on the Platform and Services, such as fraud detection and prevention, conducting investigations and risk assessments, verifying language certificates or documents provided by you, and conducting checks against databases such as public government databases;
4. to send you service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested by you;
5. where we have your consent, to send you marketing and promotional messages and other information that may be of interest to you, including information about Air Translator or general promotions for partner campaigns and services. You can unsubscribe or opt-out from receiving these communications in your settings (in the "Account" section) when you login to your account;
6. to administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by Air Translator or our business partners; and
7. to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

HOW AIR TRANSLATOR USES AND PROCESSES USER COMMUNICATIONS

We may, either directly or through third-party companies and individuals we engage to provide services to us, review, scan, or analyse your communications with other users exchanged via the Platform for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research and customer support purposes. For example, as part of our fraud prevention efforts, the Platform may scan and analyse messages to mask contact information and references to other websites. This helps to prevent fraudulent actors from asking Guests to send them money outside of the Platform, such as by bank transfer or other money transfer methods. We may also scan, review or analyse messages for research and product development purposes to help make search, booking and user communications more efficient and effective, as well as to debug, improve and expand product offerings. We will not review, scan, or analyse your communications for sending third-party marketing messages to you. We will also not sell these reviews or analyses of communications to third parties. We will also use automated methods to carry out these reviews or analyses where reasonably possible. However, from time to time we may have to manually review some communications. By using the Platform, you consent that Air Translator, in its sole discretion, may, either directly or through third-party companies and individuals we engage to provide services to us, review, scan, analyse, and store your communications, whether done manually or through automated means.

WHEN AIR TRANSLATOR DISCLOSES OR SHARES PERSONAL INFORMATION. AND TO WHOM

We may transfer, store, use and process your information, including any Personal Information, to countries outside of the European Economic Area ("EEA") including the China. Please note that laws vary from jurisdiction to jurisdiction, and so the privacy laws applicable to the places where your information is transferred to or stored, used or processed in, may be different from the privacy laws applicable to the place where you are resident.

Your Personal Information may be disclosed as follows:

1. Parts of your public profile page that contain some Personal Information may be displayed in other parts of the Platform to other users for marketing purposes or to the extent necessary to operate and manage referral and rewards programs.
2. As a translator your public profile page will always include some minimum information such as the translator's location and language skills, self description, availability, public profile photo and ratings and reviews left by other users.
3. When you submit a request for translation, your full name will become visible to the Translator along with language requested. Once the Translator accepted your request you will be able to start the session using in-app text message, voice message, and video calls. Telephone numbers will be masked, you are responsible for other information during your conversation with each other.

4. When your request for a translation session is accepted by the Translator or when you accept a User's request, we will disclose some of your Personal Information to the Translator or the User. However, your billing and payout information will never be shared with another user.

5. We will ask the User to review the translation session. If you choose to provide a review, your review may be public on the Platform.

6. You may link your account on a third-party social networking site to your Air Translator's account. We refer to a person's contacts on these third-party sites as "Friends". When you create this linkage:

- some of the information you provide to us from the linking of your accounts may be published on your Air Translator account profile;
- your activities on the Platform may be displayed to your Friends on the Platform and/or that third-party site;
- other Air Translator users may be able to see any common Friends that you may have with them, or that you are a Friend of their Friend if applicable;
- other Air Translator users may be able to see any schools, hometowns or other groups you have in common with them as listed on your linked social networking site(s); and
- the information you provide to us from the linking of your accounts may be stored, processed and transmitted for fraud prevention and risk assessment purposes.

The publication and display of information that you provide to Air Translator through this linkage is subject to your settings and authorisations on the Platform and the third-party site.

7. We may also engage third-party companies and individuals, who may be located outside of the EEA, to provide services to us, including but not limited to technology services and services to help verify your identification, to conduct checks against databases such as public government databases (where legally allowed), to otherwise assist us with fraud prevention and risk assessment, to assist us with customer service, and to facilitate the payments or reimbursements you request (such as Braintree and PayPal). We may provide Personal Information about you to these third parties, or give them access to this Personal Information, for the limited purpose of allowing them to provide these services. We do not store credit card details nor do we share customer financial details with any 3rd parties. We will ensure that such third parties have contractual obligations to protect this Personal Information and to not use it for unrelated purposes.

8. You acknowledge, consent and agree that Air Translator may access, preserve and disclose your account information and Collective Content if required to do so by law or in a good faith belief that such access, preservation or disclosure is reasonably necessary to (a) respond to claims asserted against Air Translator; (b) to comply with legal process (for example, subpoenas and warrants); (c) to enforce and administer our agreements with users, such as the Terms of Service, and this Privacy Policy; (d) for fraud prevention, risk assessment, investigation, customer support, product development and de-bugging purposes; or (e) to protect the rights, property or personal safety of Air Translator, its users or members of the public. We will use commercially reasonable efforts to notify users about law enforcement requests for their data unless:

- providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law; or
- based on information supplied by law enforcement, we, in our sole discretion, believe: (a) that providing notice could create a risk of injury or death to an individual or group of individuals, (b) that the case involves potential harm to minors, or (c) that harm or fraud could be directed to Air Translator, its Members, the Platform, or Services.

We may also publish, disclose and use Aggregated Information and non-personal information for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

BUSINESS TRANSFERS BY AIR TRANSLATOR

If Air Translator undertakes or is involved in any merger, acquisition, reorganisation, sale of assets or bankruptcy or insolvency event, then we may sell, transfer or share some or all of our assets, including your Personal Information. In this event, we will notify you before your Personal Information is transferred and becomes subject to a different privacy policy.

HOW TO CHANGE OR DELETE YOUR INFORMATION, OR CANCEL YOUR AIR TRANSLATOR ACCOUNT

You may review, update, correct or delete the Personal Information in your Air Translator account. If you would like to correct your information or cancel your Air Translator account entirely, you can do so by logging in to your account or contact customer services.

Please also note that any reviews and ratings posted by you may continue to be publicly available on the Platform in association with your first name, even after your Air Translator account is cancelled.

SECURING YOUR PERSONAL INFORMATION

We are continuously implementing and updating administrative, technical, and physical security measures to help protect your Personal Information against unauthorised access, destruction or alteration. However, no method of transmission over the Internet, and no method of storing electronic information, can be 100% secure. So, we cannot guarantee the absolute security of your transmissions to us and of your Personal Information that we store.

CHANGES TO THIS PRIVACY POLICY

We may change how we collect and then use Personal Information at any time and without prior notice, at our sole discretion. We may change this Privacy Policy at any time. If we make material changes to the Privacy Policy, we will notify you either by posting the changed Privacy Policy on the Platform or by sending an email to you. We will also update the "Last Updated Date" at the top of this Privacy Policy. If we let you know of changes through an email communication, then the date on which we send the email will be deemed to be the date of your receipt of that email.