

## Privacy Policy - - [Holiday.com](https://www.holiday.com) eSIM Roaming

### Effective date:

Telna Inc., (we," "us," or "our"), recognizes the importance of your privacy. This Privacy Policy describes how Telna as a Data Controller, collects, uses, shares, and protects your personal information, also known as personal data, when providing you the Holiday.com eSIM services. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions.

By registering an account or otherwise using or visiting any Holiday.com eSIM website, application, product, software, tool, data feed, and/or service (collectively the "Service"), you understand and agree to the terms of this policy.

This Privacy Policy explains how we collect, use, disclose, retain, and protect your personal information. Please read this Privacy Policy carefully.

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### 1. Applicability of this Privacy Policy

This Privacy Policy applies to users of Holiday.com eSIM's services. Holiday.com acts as our agent. To read more about Holiday.com's role please refer to their privacy policy. (the "Services").

This Privacy Policy describes how Holiday.com eSIM collects and uses data and applies to all Holiday.com eSIM users. This Privacy Policy specifically applies to:

- **End Users:** Individuals who use and interact directly with Services via their Holiday.com eSIM account for their personal use.

### 2. How we collect, disclose, and use personal information

We collect information about you in a variety of ways depending on how you interact with us and our Services, including:

- **Directly from you** when you provide it to us, such as when you register for an account, sign up to receive communications from us, place an order, make a purchase, or contact us by phone, email, or otherwise.
- **Automatically**, using cookies, server logs, and other similar technologies when you interact with us through our Services and/or through emails, where permitted by law or where you consent.

Telna and Holiday.com operate as separate data controllers for the services they offer to you. **Telna as a data controller**

Telna assumes the role of data controller when it determines the purposes and means of processing personal data for the provision of eSIM services. As a data controller, Telna is responsible for ensuring that personal data is processed in compliance with applicable data protection laws. Activities under Telna's data controller capacity include:

- **Purchase and Activation:** Holiday.com eSIM is the data controller when users purchases and activates a Data Plan through our Agent, Holiday.com, who acts as a separate Data Controller.
- **Key activities:**
  - **Service Delivery:** Using data to provide Holiday.com eSIM's products and services.
  - **Fraud Prevention:** Monitoring and detecting fraudulent transactions and activities.
  - **Legal Compliance:** Adhering to applicable financial, legal, and regulatory obligations.

### 3. Information we collect

The following provides examples of the type of information that we collect in a variety of contexts and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Registration	We collect your name and contact information, including email, when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We have a legitimate interest in providing account-related functionalities to our users. Accounts can be used for easy checkout and to save your preferences and transaction history. We may also process this information to fulfill our contract with you.
Support	If you contact us for support, we will collect your name and email address, as well as any other content that you send to us, in order to reply.	We have a legitimate interest in receiving, and acting upon, your feedback or issues.

### 4. Data Retention

We retain your personal information only based upon the specific retention period below to fulfill the purposes outlined in this Privacy Policy, including meeting any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law. When determining the appropriate retention period, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure, the purposes for which we collected the information and whether we can achieve those purposes through other means, as well as applicable legal requirements.

Account Registration Information: Retained for the duration of your account's existence plus an additional 1 year post account deletion to comply with legal obligations, resolve disputes, and enforce our agreements.

Order Placement Information: Retained for 10 years to comply with legal and regulatory requirements related to commerce, customer support, and warranty provisions.

Feedback/Support Data: Retained for 1 year after the last interaction to ensure we have sufficient history to reference in case of recurring issues or follow-up support is needed.

Upon expiry of the retention periods, personal information is securely deleted or anonymized so it can no longer be associated with an individual.

## 5. How We Use Personal Information

In addition to the purposes and uses described above, we use information in the following ways:

- To provide products and services or process returns.
- To improve our services and product offerings.
- To conduct analytics.
- To communicate with you, such as responding to and following up on your requests, inquiries, issues, or feedback.
- To detect and protect against malicious, deceptive, fraudulent, or illegal activity, including violations of our policies and terms, security incidents, and harm to the rights, property, or safety of our company, users, employees, or others.
- To debug, identify, and repair errors that impair the intended functionality of our website and services.
- To comply with our legal or regulatory obligations, establish or exercise our rights, and defend against legal claims.
- For internal administrative purposes, For such other purposes as you may consent to from time to time.

Although the sections above describe our primary purposes for collecting your information, we often have more than one purpose. For example, if you complete an online purchase, we collect your information to perform our contract with you, and we also have a legitimate interest in retaining your information after your transaction is complete to quickly and easily respond to any questions about your order. As a result, our collection and processing of your information is based on your consent, our need to perform a contract, our legal obligations, and/or our legitimate interest in conducting our business.

## 6. How We Share Personal Information

In addition to the specific situations discussed elsewhere in this Privacy Policy, we may disclose personal information in the following situations:

- **Affiliates and Acquisitions:** We may share information with our corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or assets, we will share information with that company, including at the negotiation stage.
- **Other Disclosures Without Your Consent:** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information to establish or exercise our rights, defend against a legal claim, investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of persons or property, violations of our policies, or to comply with your request for the shipment of products or the provision of services by a third-party intermediary.
- **Service Providers:** We may share your information with service providers who help us administer our website, provide services for the effective functioning of our business, offer technical support, process payments, and assist in fulfilling orders.

- **Other Disclosures With Your Consent:** We may disclose your information to other third parties when we have your consent or direction to do so.

## 7. Your Rights

Depending on your location and subject to applicable law, you may have the following rights:

- **Access Your Data:** The right to request that we disclose the personal information we collect, use, or disclose about you, and information about our data practices. In certain limited circumstances, you may also request to receive access to your personal information in a portable, machine-readable format.
- **Verify and Seek Rectification:** The right to request that we correct inaccurate personal information that we maintain about you. We rely on you to update and correct your personal information. Our website allows you to modify or delete your account profile. If our website does not permit you to update or correct certain information, you can contact us to request that your information be modified. Note that we may keep historical information in our backup files as permitted by law.
- **Have Your Personal Information Deleted or Otherwise Removed:** The right to request that we delete personal information that we have collected about you.
- **Withdraw Your Consent at Any Time:** The right to withdraw consent where you have previously given consent to the processing of your personal information.
- **Object to Processing of Your Personal Information:** The right to object to the processing of your personal information if the processing is carried out on a legal basis other than consent.
- **Online Tracking:** We do not currently recognize the “Do Not Track” signal.

Please note that not all of the rights described above are absolute and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, or if we are unable to adequately verify your identity. We will not discriminate against individuals who exercise their privacy rights under applicable law.

To submit a request to exercise any of the rights described above, or to appeal a determination we made related to a data subject rights request, please contact us using the information below or via our Contact Us page. Note that, as required by law, we will require you to prove your identity. Depending on your request, we may ask for information such as your name, the last item you purchased from us, or the date of your last purchase from us. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct, or delete personal information about you in our files.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. If you are an authorized agent submitting a request on behalf of an individual, you must attach a copy of a signed document indicating that you are authorized to act on another person’s behalf.

### How Do I Delete My Account?

You may delete your account by using the “Delete Account” function within your Profile Settings. Log into your account, navigate to your Profile settings, click the “Delete Account” button, and confirm your intention. We will process the request without delay or within one month of receipt of the request should there be special requirements attached.

Please note that in any case, we may need to verify your identity and your relationship with us before we can proceed with your request.

### When Does TelnaContinue to Process Data After It Has Received a Deletion Request or Objection to the Processing?

In certain circumstances, Telna may be required by law to retain and process your personal data even after a deletion request or objection to the processing. For instance, Telna is required to retain certain personal information to satisfy legal obligations.

## **8. Data Transfer & International Data Transfer**

The Service is owned by Telna and may be accessed in Europe and abroad. As a result, your information may be processed in a foreign country where privacy laws may be less stringent than the laws in your country. Nonetheless, where possible, we take steps to treat personal information using the same privacy principles that apply under the law of the country in which we first received your information. By submitting your personal information to us, you agree to the transfer, storage, and processing of your information in a country other than your country of residence, including, but not necessarily limited to, the United States. If you would like more information concerning our attempts to apply the privacy principles applicable in one jurisdiction to data when it goes to another jurisdiction, you can contact us using the information below.

## **9. Security**

We follow generally accepted industry standards to help protect your personal information. No method of transmission over the internet, mobile technology, or method of electronic storage is completely secure. Therefore, while we strive to maintain physical, electronic, and procedural safeguards to protect the confidentiality of the information we collect online, we cannot guarantee its absolute security.

Telna's users remain responsible for keeping their password and credentials secure. If you believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you have with us has been compromised), please immediately notify us of the problem by contacting us on [support@telna.com](mailto:support@telna.com).

The Company documents and maintains formal privacy policy document, ensuring they are readily available to internal personnel and third parties who require them. The latest version of the privacy policy is made publicly available on the Company website. Management reviews and approves privacy policies at least annually to ensure they remain current and compliant. These policies include the following practices:

- Account Management
- Systems Access
- Access Enforcement
- Access to Production Systems
- Access Reviews
- Log Management System
- Log Management Procedures
- Audit Events
- Log Protection
- Vulnerability Management Procedures
- Boundary Protection
- Configuration Management System
- Identification and Authentication Authorized Users
- Authenticator Management
- Incident Response Plan
- Incident Response Handling
- Personal Data Requests and Consent Management
- Personal Data Collection Limitation
- Personal Data Collection Method
- Third Party Disclosure
- Consent for Personal Information
- Personal Information Identity Validation
- Personal Data Inventory Management
- Data Classification and Handling
- Senior Information Security Officer
- Vulnerability Scanning
- Risk Assessment

Access to Production  
Production Data Isolation  
Production Data at Rest  
Production Data in Transit  
Cryptographic Key Management

## **10. Changes to This Policy**

We reserve the right to change the terms of this Privacy Policy at any time. If there are material changes to this statement or how we will use your personal information, we will notify you by prominently posting a notice of such changes here or on our home page, or by sending you an email. We encourage you to review this policy whenever you visit one of our websites or applications. Our privacy policy includes an “effective” and “last updated” date. The effective date refers to the date that the current version took effect. The last updated date refers to the date that the current version was last substantively modified.

## **11. Children**

Our Services are not intended for children under the age of 18 and we do not knowingly collect personal information from unemancipated minors under age 16, without parental consent.

## **12. Contact Information**

If you have any questions, comments, appeals, or complaints concerning our privacy practices, or if you need to access this Privacy Policy in an alternative format due to having a disability, please contact us at [support@telna.com](mailto:support@telna.com). We will attempt to respond to your requests and provide you with additional privacy-related information.