TRAVEL CODE DATA RETENTION POLICY

Travel Code, Inc., 77 SE 5th Street, Suite 2805, Miami, Florida 33131, United States

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1. PURPOSE AND SCOPE

This policy explains how long Travel Code retains personal information and business records, and how that information is deleted.

It covers information processed through our website, web and mobile applications, and the services we provide to business customers — corporate travel management, expense management, and the corporate card program.

This policy is a general statement of our practice. **Where we process information on behalf of a business customer, the retention terms in that customer's agreement and Data Processing Addendum take precedence.**

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2. PRINCIPLES

We retain information only as long as necessary to:

- provide and support the services;
- meet legal, regulatory, tax, and financial recordkeeping obligations;
- meet obligations arising from our banking, card, and travel partner relationships;
- resolve disputes and establish or defend legal claims; and
- maintain security and prevent fraud.

Retention periods differ by category. Where a single record serves more than one purpose, **the longest applicable period governs**. In particular, a booking or expense record is also a financial record, and is retained for the financial recordkeeping period rather than a shorter operational one.

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3. HOW WE DETERMINE RETENTION PERIODS

We do not apply a single retention period across all information. We determine the appropriate period for each category based on:

- the amount, nature, and sensitivity of the information;
- the potential risk of harm from unauthorized use or disclosure;
- whether the purpose can be achieved by other means, including de-identification;
- the period for which the information remains operationally useful to the customer;
- applicable legal, tax, regulatory, and financial recordkeeping requirements;

- requirements imposed by our banking, card, and travel partners; and
- applicable limitation periods for legal claims.

Because these factors differ by data type and by service, **actual retention periods vary**.

3.1 Indicative guidance

The following describes our general approach. It is guidance, not a commitment to a fixed period.

Category	General approach
Account, profile, and traveller data	Retained for the life of the account, then handled under §4
Booking, travel, and expense records	Retained for the period required by financial, tax, and audit recordkeeping obligations, which is typically several years and is generally longer than the operational life of the record
Card transaction and card account records	Retained for the period required by financial recordkeeping obligations and by our card partners, which may be longer than for other records
Identity verification, know-your-business, and anti-money-laundering records	Retained for the period required by anti-money-laundering and sanctions obligations following the end of the relationship
Invoices, payments, and rewards ledger entries	Retained for the period required by financial and tax recordkeeping obligations
Support communications	Retained while relevant to service quality and dispute resolution
Security and access logs	Retained for the period needed for security monitoring and investigation
Website analytics and cookie data	Retained for the period stated in our Cookie Policy
Marketing contacts	Retained until objection or withdrawal of consent, after which the contact is added to a suppression list so that we do not contact them again

Where a single record serves more than one purpose, **the longest applicable period governs**. In particular, a booking or expense record is also a financial record and is retained accordingly rather than for a shorter operational period.

Legal hold overrides everything above. Information subject to a legal hold is preserved until the hold is lifted.

Retention obligations may prevent deletion. Our obligations may require us to retain information after a user is no longer authorized or after a customer's account has closed, and may in some cases prevent us from deleting information when asked to do so.

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4. TERMINATION OF A CUSTOMER RELATIONSHIP

4.1 For **ninety (90) days** after termination, the customer may export its data through the Platform.

4.2 After that period, we delete customer data from active systems within **thirty (30) days**, except for:

(a) data we are required to retain under §3, in particular financial, tax, identity verification, and anti-money-laundering records; (b) backups, which are overwritten in the ordinary rotation cycle and are not readily accessible; (c) data subject to a legal hold; and (d) de-identified or aggregated data that no longer identifies any individual or customer.

4.3 We will certify deletion in writing on request.

4.4 Retained records under §4.2(a) remain subject to the confidentiality, security, and access restrictions that applied before termination, and are not used for any other purpose.

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5. DELETION AND DE-IDENTIFICATION

Deletion is performed by secure erasure or by de-identification such that the information can no longer reasonably be linked to an individual. De-identified and aggregated data may be retained indefinitely for analytics and service improvement.

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6. INDIVIDUAL DELETION REQUESTS

Individuals may request deletion as described in our Privacy Policy.

We cannot delete information we are required to retain under §3, including financial, tax, identity verification, and anti-money-laundering records, and information subject to a legal hold. Where we cannot delete, we will explain why and will restrict further use.

If you are an employee or authorized user of one of our business customers, direct your request to that customer, which controls the information and instructs us on deletion.

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7. REVIEW

This policy is reviewed at least annually and updated when our services, obligations, or partner requirements change. The effective date appears at the top.