



PRIVACY POLICY



The Only
Corporate Travel Rewards



Turns Travel Expenses
Into Rewards

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Effective Date: February 1, 2019.

This Privacy Policy applies to information we collect in relation to your use www.middleside.com and www.flyrewards.me, and any other websites, mobile and other applications, or services that post a link to this Privacy Policy (collectively, the "Service"). This Privacy Policy describes how Middle Side Travel sarl, P.O. Box (add details), Beirut, Lebanon ("Middle Side," "Company," "we," or "us") collects, uses and shares information about you.

By using our Service, you agree to our Terms & Conditions (add link) and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy.

Transfer of Information

The information we collect from you through the Service may be transferred to, stored at, and processed in destinations outside of the country in which you are located, and may be accessible to the governments of such destinations under local law. This includes processing by us, our affiliates, our third party payment processing companies and other third parties who are described in the "Sharing of Information" section below. You agree to such transfer, storing and/or processing outside the country in which you are located. We will take steps reasonably necessary to help secure your information and to treat your information that we have collected in accordance with this Privacy Policy.

Information Collection Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you use our Service, book travel, register for our Service or set up a FlyRewards account, subscribe to our e-mails, mobile messages, or social media notifications, post on our forums or blogs, participate in the FlyRewards Program, contest, promotion, survey, or poll, communicate with us via third party social media sites, shop our Service, order physical or digital gift cards, request customer support, apply for a job or otherwise communicate with us through the Service.

The types of information we may collect include Personal Information. "Personal Information" is information that can be used to identify an individual (whether alone or in combination), such as your first and last name, e-mail address, zip code, billing address, shipping address, phone number, payment card information, social media account information, travel preferences, birth date, redress number, and demographic information. If you apply for or inquire about employment with us, "Personal Information" may also include your education, occupation, and employment history. "Personal Information" also may include sensitive information, such as present and future health status, and genetic information, to allow us to better serve your needs (for example, to assist you with boarding a flight if you need a wheelchair).

You may choose to voluntarily submit certain other information to us through the Service, including Personal Information, but you are solely responsible for your own Personal Information in instances where we have not collected such information or requested that you submit such information to us.

Information We Collect Automatically

We and our service providers automatically collect certain information from and about you when you access or use our Service. This information may include, without limitation, demographic information; IP address; browser/device/hardware type; operating system characteristics; information about your use of our Service; and data regarding network connected hardware (e.g., computer or mobile device), such as unique device identifiers, type, model, version, MAC address, device or session ID, error related data status, capability, confirmation, functionality, performance data, and connection type. This information may also include clickstream data, which is information about the page-by-page paths you take as you browse through the Service.

This information is gathered by certain tools and methods such as:

- **Log Information:** We collect information about your use of our Service, such as the type of browser you use, access times, pages viewed, your IP address and the referring link through which you accessed our Service.
- **Information Collected by Cookies and Other Tracking Technologies:** We may use cookies, web beacons (also known as "tracking pixels"), embedded scripts, location-identifying technologies, in-app tracking methods, and other tracking technologies to collect information about you when you interact with our Service or e-mails, including information about your browsing and purchasing behavior. We may combine this information with other information we collect about you and use it for various purposes, such as improving our Service and your online experience, understanding which areas and features of our Service are popular, counting visits, understanding campaign effectiveness, tailoring our communications with you, determining whether an e-mail has been opened and/or links within the e-mail have been clicked, and for other internal business purposes.
- **Cookies:** Cookies are data files that are placed on a computer when it is used to visit a website. These cookies may be used for many purposes, including, without limitation, tracking user preferences or web pages visited while using our Service. Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Service. For example, cookies allow us to store items in your cart between visits. In addition, please be aware that if you choose to block cookies, some advertising preferences that are dependent on cookies may not be able to be respected.
- **Web Beacons:** We may include small graphic images called web beacons, also known as "Internet tags" or "clear gifs" in our web pages and e-mail messages. We may use web beacons or similar technologies for a number of purposes, including, without limitation, to count the number of visitors to our Service, to monitor how users navigate the Service, and to count how many e-mails that we sent were actually opened or how many particular articles or links were actually viewed.

- **Embedded Scripts:** An embedded script is programming code that is designed to collect information about your interactions with the Service. It is temporarily downloaded onto your computer from our web server or a third party with whom we work, is active only while you are connected to the Service, and is deleted or deactivated thereafter.
- **Location-identifying Technologies:** We and our third party service providers may use GPS (global positioning systems) software and other location-based technologies to locate you so we may verify your location, and deliver relevant content to you based on your location. We may collect precise location information from your device.
- **In-App Tracking Methods:** There are a variety of tracking technologies that may be included in mobile applications, and these are not browser-based like cookies and cannot be controlled by browser settings. Some use device identifiers, or other identifiers such as “Ad IDs” to associate app user activity to a particular app.

Information we automatically collect about you, such as how you interact with our Service, may be combined with your Personal Information. If we associate any such automatically-collected information with Personal Information about you, we will treat the combined information as Personal Information. We and our business partners and other third parties may send you product promotions that are aligned with your purchase trends and/or interests identified through automatically-collected information.

Information We Collect From Our Partners and Other Sources

We may also obtain information about you (such as e-mail, address and employment history) from other sources and combine that with information we collect about you. If we receive Personal Information from a third party source and/or if we combine the information we receive from these third party sources with your Personal Information, we will treat that information as Personal Information. We are not responsible for the accuracy of the information provided by third parties or how such third parties collect, use and share such information.

We may obtain information from our partners and append it to our existing user information to better understand users’ interests and to provide more relevant content, including job listings and advertising. We may append information about you that is publicly available or information that is aggregated and/or depersonalized by partners. This information may include, for example, your travel preferences and activity, household income range, employment and education history, or postal code. This information may be associated with personal information as described herein, such as email address, physical address, first and last name combined, or phone number. We may use a third party vendor with whom we share your information to assist with this.

Use of Information

We may use information about you for various purposes. Primary purposes for use of information include to:

- Facilitate, personalize, and improve your travel experience and your online or app experience;
- Process your registration with our Service, including verifying that your e-mail address(es) are active and valid and enrolling you in the FlyRewards Program;
- Manage your profile(s) and online account(s), including purchases, orders, payments, returns, exchanges, and blog comments;
- Process and deliver frequent flyer points, sweepstakes, contest, promotion, and survey entries and rewards;
- Respond to your comments, questions and requests and provide customer service;
- Send you technical notices, updates, security alerts and support and administrative messages;
- Contact you regarding your use of our Service and, in our discretion, changes to our policies;
- Evaluate and process your application for employment; and
- Prevent fraudulent transactions and monitor against threats.

In addition, there may be secondary purposes for use of information, such as to:

- Create a usage profile of your preferences and provide advertisements, job descriptions, content or features that match your profile and interests;
- Communicate with you about products, services, offers, promotions, rewards and events (including those offered by third parties) and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities;
- Link or combine with information we get from others to help understand your needs and provide you with better service;
- Improve our Service and other Middle Side Travel websites, applications, marketing efforts, products and services;
- Conduct research and analysis, including focus groups and surveys, on our Service and other Middle Side Travel websites, applications, products and services;
- Retarget across other sites (as described in the Advertising & Analytics Services and Online Tracking section below);
- Carry out any other purpose disclosed elsewhere in this Privacy Policy or at the time you provide your Personal Information; and
- Any other purpose, with your consent or as permitted or required by applicable law.

Whether a use is primary or secondary may change over time. Some of the information we collect for primary purposes may be used for secondary purposes.

Sharing of Information

Our agents, vendors, consultants, and other service providers have access to Personal Information to carry out work on our behalf.

We may also share information about you for various purposes. Primary purposes for sharing of information include:

- To the maximum extent permitted by applicable law, in response to (i) subpoenas or other legal process or if in our good faith opinion such disclosure is required or permitted by law; and/or (ii) at the request of governmental authorities conducting an investigation;
- To defend the Terms & Conditions or other policies applicable to our Service;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, life, health, security and safety of us or any third party;
- To the maximum extent permitted by applicable law, we may also use IP addresses, mobile device identifiers or any other information we collect to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies in our discretion. Such disclosures may be carried out without notice to you;
- With our service providers for purposes of managing and fulfilling your travel reservations, product purchases, and FlyRewards Program points. For example, we may share your information with our FlyRewards Partners to help facilitate your purchase, transfer, or gift of FlyRewards Points.
- With our service providers to verify your address in order to ensure we maintain the accuracy of our database;
- With our affiliates for internal business purposes (including but not limited to managing your travel and/or accounts); and
- In connection with, or during negotiations of, any proposed or actual merger, purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, amalgamation or any other type of acquisition of all or any portion of Southwest assets, financing, disposal, conveyance or transfer of all or a portion of our business to another company.

In addition, there may be secondary purposes for sharing of information, such as:

- With our business partners, affiliates and other third parties for purposes of sending their own marketing. For example, we may share your information with our financial institution FlyRewards Partners for their direct marketing purposes, which may include, but is not limited to, marketing their co-branded credit cards to you;
- With third parties who conduct analytics or data appending (such as the process described above) in order for us to offer you more relevant products and services;
- For a purpose disclosed elsewhere in this Privacy Policy, or at the time you provide your Personal Information; and
- With your consent or at your direction or as required or permitted by applicable law.

Whether sharing is primary or secondary may change over time. Some of the information we share under primary purposes may be shared for secondary purposes.

In our sole discretion, we may also share aggregated or de-identified information that cannot reasonably be used to identify you with third parties or affiliates.

Information You Disclose Publicly or to Others

The Service may permit you to submit ideas, photographs, user profiles, writings, music, video, audio recordings, computer graphics, pictures, data, questions, comments, suggestions or other content, including Personal Information (collectively, "User Content"), such as on blogs and forums, and in association with your account and user profile. We or others may store, display, reproduce, publish, distribute or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed) and may or may not attribute it to you. Others may have access to this User Content and may have the ability to share it with third parties. Please think carefully before deciding what information you share, including Personal Information, in connection with your User Content. Please note that Middle Side Travel does not control who will have access to the information that you choose to make public, and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the Service or what others do with information you share with them on the Service. We are not responsible for the accuracy, use or misuse of any User Content that you disclose or receive from third parties through the Service. We are not responsible for User Content you submit to third party services via our Service.

Fly Rewards, Sweepstakes, Contests, and Surveys

We may offer you the opportunity to participate in our FlyRewards Program, sweepstakes, contests, surveys, and other promotions (each, a "Promotion") that may require registration or for you to submit Personal Information through the Service. Participation in these Promotions is completely voluntary. If you choose to enter a Promotion, your Personal Information may be disclosed to third parties in connection with the administration of such Promotion, such as in connection with winner selection, prize fulfillment, and as required by law, such as on a winners list. By entering a Promotion, you are agreeing to the official rules that govern that Promotion, which may contain specific requirements of you, including, except where prohibited by law, allowing the sponsor and/or other parties to use your name, voice and/or likeness in advertising or marketing materials. Middle Side may offer opportunities to enter a Promotion or other feature that we offer jointly with a third party. As a result of your participation in such feature, your information may be shared with the third party that is jointly offering the feature, which will be disclosed at the time your information is collected.

Advertising & Analytics Services and Online Tracking

We engage third parties to serve advertisements on our behalf across the Internet and to provide analytics about the use of our Service. In addition, we may participate in online advertising networks and exchanges that display relevant advertisements to our Service visitors based on their interests as reflected in their browsing of the Service and certain third party sites participating in the same networks and exchanges. These entities may use cookies, web beacons, pixels, embedded scripts, and other technologies to automatically collect information about your use of the Service, such as your IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on the Service and other websites and better understand your online activity. Data collected from a particular browser or device may be used with another computer or device that is linked to the browser or device on which such data was collected, or transferred to a non-affiliate for such purposes.

This means that some information about your browsing of the Service and certain third party sites may be shared with these companies for the purpose of delivering ads to you on the Service and certain third party sites, and Middle Side may receive from some of these companies information about third party sites that you have visited. This information is used for marketing purposes and the practice is sometimes termed "retargeting" to indicate that information from one retailer is used to suggest to you relevant products offered by another retailer.

These and other third parties may also collect Personal Information about your online activities over time and across different websites when you use our Service.

We may also work with third parties to serve ads to you as part of a customized campaign on other websites or platforms.

This Privacy Policy does not cover any use of information that such third parties themselves may have collected from you (e.g., type of browser, operating system, domain name, day and time of visit, page(s) visited) or the methods used by the third-parties to collect that information (e.g., cookies, web beacons and clear gifs).

Note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, Southwest currently does not alter its practices when it receives a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," you may wish to visit <http://www.allaboutdnt.com>.

Certain advertising networks and exchanges may participate in the Digital Advertising Alliance ("DAA")

AdChoices Program and may display an Advertising Option Icon for interest-based ads. You can learn more about the DAA AdChoices Program at <http://www.youradchoices.com>. The DAA also offers a tool for opting out of the collection of cross-app data on a mobile device for interest-based advertising. To exercise choice for companies participating in this tool, download the AppChoice app at <http://youradchoices.com/appchoices>.

In addition, certain advertising networks and exchanges may participate in the Network Advertising Initiative (“NAI”). NAI has developed a tool that allows consumers to opt out of targeted advertising delivered by NAI members’ ad networks. To learn more about opting out of targeted advertising or to use the tool, visit <http://www.networkadvertising.org/choices/>. We are not responsible for effectiveness of, or compliance with, any third-parties’ opt out options or programs or the accuracy of their statements regarding their programs. Choices you make are both browser and device-specific.

Social Features

Certain functionality on the Service is specifically designed to permit interactions that you initiate between the Service and third party websites or services, including third party social networks (“Social Features”). Examples of Social Features include enabling you to transmit content to the Service from your account on a third party website or service; to “like” or “share” our Service content to other websites or services; to log-in to the Service using your username and password for a third party site or service; and to otherwise connect our Service to a third party website or service.

If you choose to use Social Features, information you post or provide access to, including User Content, may be publicly displayed on our Service or by the provider of the Social Feature that you use. Similarly, if you post information on a third party platform that references our Service (e.g., by using a hashtag associated with Middle Side Travel or FlyRewards in a tweet or status update), your post may be published on our Service in accordance with the terms of the third party website or service. Also, both Middle Side and the third party may have access to certain information about you and your use of our Service and the third party site or service. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections,” or information about you is otherwise accessible through your “connections” web pages, profile pages, or similar pages on a social networking or other third party website or interactive service.

The information we collect in connection with Social Features is subject to this Privacy Policy. The information collected and stored by the third parties remains subject to those third parties’ privacy practices, including whether the third parties continue to share information with us, the types of information shared, and your choices with regard to what is visible to others on those third party websites or services.

Refer-a-Friend

You may use a referral feature to inform a friend about our services. Middle Side may use any e-mail address provided when using this referral feature to send a single e-mail to such designated recipients about products, services, offers, promotions, rewards and events and provide news and information we think will be of interest to such designated recipients. By using a referral feature, you represent that you have permission to provide your friend's email address. Middle Side Travel will not be responsible for the accuracy of the information you provide.

Third Party Websites

The Service contains hyperlinks to other websites or locations that we do not control and are operated and controlled by third parties ("Third Party Websites"). We make no representations regarding the policies or business practices of such Third Party Websites and encourage you to familiarize yourself with their privacy policies before providing them with your Personal Information. Our Privacy Policy does not apply to these Third Party Websites. You should read the privacy policy of each Third Party Website as these Third Party Websites may use their own cookies, web beacons and other technology to independently collect information about you. In addition, these Third Party Websites may solicit Personal Information from you.

Your Choices Profile and Apps

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration. The Service may allow you to access, review, correct, update, and remove or make inaccessible Personal Information you have provided through the Service's registration or otherwise, and you may provide registration updates and changes by logging into your FlyRewards account, or contacting us by phone on 01246424 or e-mail at info@middleside.com

With respect to our mobile and other applications, you can prospectively stop all collection of information by the application by uninstalling the application. Also, you may at any time opt out from further allowing us to have access to your location data by adjusting the permissions in your mobile device.

We will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable (but we may retain prior information as business records). Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons. Also, if you have made any public postings on the Service such as in forums or blogs, these communications cannot generally be removed.

Promotional Communications

You can opt out of receiving promotional e-mail communications from us at any time by following the instructions provided in those communications or e-mail at info@middleside.com

As a Middle Side Travel customer, FlyRewards account holder, or user of the Services, you may also receive periodic promotional postal mailings from Middle Side Travel and/or our select marketing partners. If you do not wish to receive such promotional mailings, you may call our Customer Relations at +961-1-246424 (Monday - Friday, 9am-5pm).

Please note that even if you opt out of receiving promotional communications, we may continue to send you non-promotional e-mails and other types of communications, as permitted by law, such as those about our ongoing business relations. For example, we may send e-mails that contain service-related announcements that affect your account, confirmations and updates regarding flight reservations you have made, requests for feedback on our services and/or your specific travel experiences, information about your job application or responses to your comments and feedback submitted to us.

Middle Side mobile applications may send you notifications that may include alerts, sounds, and icon badges. These push notifications or in-app messages may include both operational messages and promotional messages regarding products, services and offers that may be of interest to you. Push notifications can be configured in settings on your mobile device. As with e-mails, even if you opt out of receiving promotional communications, we may continue to send you non-promotional push notifications, such as those about your use of the applications or our ongoing business relations.

Children

Our Service is not intended for and is not targeted to children under the age of thirteen (13). If you are a child under the age of thirteen (13), you are not permitted to use the Service and should not send any information about yourself to us through the Service.

We do not knowingly collect any personal information from children under the age of 13 and, if we learn that we have received information from a user under the age of 13, we will delete this information in accordance with the Children's Online Privacy Protection Act ("COPPA"). If you are a parent or guardian and you believe that your child under the age of thirteen (13) has provided us with personal information without COPPA-required consent, please contact us by e-mail at info@middleside.com

Data Security

We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Although Middle Side Travel uses reasonable efforts to help protect your information, transmission via the Internet is not completely secure and Middle Side cannot guarantee the security of your information collected through our Service. Further, you are responsible for protecting your password.

Changes to This Privacy Policy

This Privacy Policy is current as of the effective date set forth above. Middle Side Travel reserves the right to change this privacy policy from time to time consistent with applicable privacy laws and principles. If we make changes to this Privacy Policy we will notify you by revising the date at the top of this Privacy Policy, and in some cases, we may provide you with additional notice (such as adding a statement to the homepages of our Service or sending you an e-mail notification). If the changes are material, we may provide you additional notice.

Contact Us

If you have any questions, complaints, or suggestions regarding this Privacy Policy, please feel free to contact us by phone on +961-1-246424 or e-mail at info@middleside.com

IN PARTNERSHIP WITH

