

1.1 Website Privacy Policy

1.1.1 Introduction

For AirAsia a-Access Campaign full Terms and Conditions, please refer to this link: <https://www.airasia.com/aa/campaign/en/gb/aaccess.html>.

TLC Marketing Group Pte Ltd is ICO registered. In this policy, 'we', 'our' and 'TLC' each mean all the companies that make up the TLC Group.

This policy sets out how TLC uses (and protects) personal information – including information from the use of our website and participating in promotions organised by TLC and our partners.

TLC uses and stores personal information for the following purposes

- To provide a direct marketing service
- Advertise and market on behalf of consumers and partners
- Undertake research
- Maintain our own accounts and records
- Support and manage our staff
- Fulfil our legal obligations and exercise our legal rights (including legal proceedings)

If we collect information for one purpose and then intend to use it for a different purpose, we will seek your consent to do so and/or inform you where necessary or appropriate. Our legal grounds for using and storing personal information are explained in more details below.

TLC is the Data Controller for personal information relating to people who have:

- Agreed to receive marketing information from TLC
- Taken part in promotions organised by, on behalf or with TLC
- Used TLC's website and websites we operate on behalf of clients
- TLC's employees and the employees of organisations which we work with

TLC will only disclose any personal information to organisations outside of TLC:

- To carry out our business and to provide a service or carry out a contract with you
- Where we have your consent
- Where we have justifiable reason (including where legally obliged or authorised and where we are pursuing legitimate interests)

We might transfer your personal information to places outside the European Economic Area and store it there where we or organisations we work with might process it. If that happens, we or the organisations we work with will apply the same security standards as when we process your information in the EEA.

1.1.2 Website visitors and people engaging with products, services or promotions

It is necessary for the products, services and promotions we provide for TLC to use and store personal information. We are committed to the privacy of every individual who visits our sites or sites we operate on behalf of a client, responds to our interactive advertisements and other communications or engages with our products services or promotions. We are also committed to transparency about how we use personal information and informing people of their rights in relation to the use and storage of personal information. More information about your rights is available at the end of this policy.

1.1.3 Types of personal information and how we collect it:

- Information that you provide by registering or by filling in forms on this site. This includes information provided at the time of subscribing to any services we offer, downloading information posted on our site, posting material or requesting further services
- We may also ask you for information in connection with or participation in any promotions or competitions sponsored, promoted or offered by us and/or any third party and information you provide when giving us feedback or completing profile forms and when you report a problem with our site or information we learn from your use of our service and your visits to our site
- Other information from your interaction with our site, services, content and advertising, including computer and connection information, statistics on page views, traffic to and from the site, ad data, IP address and standard web log information.
- If you contact us, we may keep a record of that correspondence
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise and the resources that you access (please see Cookies section below for more details)

1.1.4 Why we collect your personal information and how we use it:

The information we hold on you will be used in different ways. Here are the main ones:

- To provide a product or service you have requested
- Offer you a personalised experience and understand your needs better
- Inform you of events or updates you have asked for or contact you if we need to obtain or provide additional information

Specifically, we use your information we collect to carry out our business and to provide a service, product or promotion or carry out a contract with you:

- To fulfil product, service or promotion requests
- Provide the best possible customer services and to help us with internal administration
- Contact you with important information relating to products, services or promotions, such as confirming your order, reminding you of an upcoming event or letting you know about changes that may affect you

If you do not provide personal information necessary for a specific service, product or promotion, we may not be able to provide the service or product or you may not be able to take part in the promotion.

1.1.5 Who we share personal information with

The following organisations handle or store information on our behalf:

- We share information with partner organisations, which are involved in the products, services or promotions.
- In addition, we may have to share information with regulators such as the ASA or HMRC.

1.1.6 How long we store personal information

To help TLC operate our service and meet our legal obligations we will store personal information for 1 months after the date of the product, service or promotion for which the information was used or stored.

1.1.7 Your rights

You have the following rights:

- The right to be informed personal information relating to you is being used or stored (which is what this privacy notice is for)
- The right to access personal information relating to you which we use or hold
- The right to object to the use of personal information relating to you carried out on the ground of legitimate interests
- The right to withdraw consent to the use or storage of personal information relating to you where the ground for the use or storage is your consent. The withdrawal of consent will not affect any use or storage of personal information relating to you which was based on consent before it was withdrawn.
- The right to erasure of information relating to you that we use or hold (only in some circumstances)
- The right of data portability
- The right to have personal information relating to you rectified if it is inaccurate
- The right to have personal data relating to you restricted or blocked from being used or stored

Please be aware that these rights are not always absolute and there may be some situations in which you cannot exercise them or they are not relevant. To help you understand how they work, we have provided links to the Information Commissioner's Office's guidance on each of the rights.

1.1.8 Complaints

If you have any cause for concern about TLC's handling of personal information, please contact us using the details below. If we are unable to resolve your concerns about our handling of personal information, you have the right to complain to the Information Commissioner's Office.

1.1.9 Contact details

TLC Marketing Group Pte Ltd.
16 Raffles Quay,
#33-03, Hong Leong Building, Singapore 048581

privacy@tlcmarketing.com

[TLC Marketing | Asia](#)

TLC may modify this Privacy statement and you should therefore periodically visit this page to be sure that you have read and agree with our most current privacy statement. We are not responsible for the content of external sites.

In accordance with the GDPR in its latest version, the information collected is intended for TLC Marketing in its capacity as data controller. Your information will be kept until 30/11/2022 – end of redemption from code + 3 months (90 days). TLC Marketing takes all measures to ensure the security and confidentiality of the data, in accordance with the provisions of the aforementioned law. Consumers also have the right to access, rectify and oppose, for legitimate reasons, personal data concerning them. In order to exercise these rights, the consumer may send his request by email at privacy@tlcrewards.com or by mail to the following address: TLC Marketing Group Pte Ltd, TLC Marketing Group Pte Ltd, 16 Raffles Quay, #33-03, Hong Leong Building, Singapore 048581, accompanied by a copy of a valid identity document.

1 Cookies

1.1.10 Cookies Policy

For AirAsia a-Access Campaign full Terms and Conditions, please refer to this link: <https://www.airasia.com/aa/campaign/en/gb/aaccess.html>.

TLC Marketing Group Pte Ltd website and websites, we operate and administer on behalf of our client's places Cookies on your computer.

1.1.11 What are Cookies?

Cookies are small text files placed on your computer or mobile device by websites. They store preferences and other information to allow you to use the website efficiently and also provide information on how websites are used. Some cookies are essential for the website to function, others are optional.

With most Internet Browsers, you can erase Cookies from your computer hard drive, block all Cookies, or receive a warning before a Cookie is stored. Further details on removing Cookies is available on www.aboutcookies.org. Please note that removing or blocking Cookies may interfere with your full use of our sites.

1.1.12 Essential Cookies

We use session Cookies to store information that are essential for the website to function. This includes Cookies that store code validation and reward information. These Cookies expire when you terminate your browser session.

1.1.13 Performance Cookies

These Cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These Cookies do not collect information that identifies a visitor. All information these Cookies collect is aggregated and therefore anonymous. It is only used to improve how a website works.

We use Cookies to 'remember' what interactions the user has had with the site and the web pages the user has viewed, for example the URL of the page.

1.1.14 What first party Cookies does this site use?

Cookie	Name	Purpose	Expiry
--------	------	---------	--------

TLC Temporary .NET Sessions State	ASP .NET_Session Id	Used to maintain an anonymized user session by our web servers. When you leave the site, this cookie will be removed.	On close of current web session
TLC Persistent Cookie Consent pop up	CC_analytics	Cookie Consent cookies which appear after you have clicked on the 'allow cookies' in the floating footer. More info http://silktide.com/cookieconsent	1 year from creation

Cookie	Name	Purpose	Expiry
These Cookies are used to collect information about how visitors use a TLC site. We use the information to compile reports and to help us improve the site. The Cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.			
Google Analytics	_utma	Google stores the information collected by the cookies on servers in the United States. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. Unless you opt-out of the Google Cookie, by using this site you consent to the use of the Google Cookie and any information generated by Google Analytics.	2 years
	_utmb		30 minutes
	_utmc		On close of web session
	_utmz		6 months
You can find an overview of privacy at Google here . For information on how to opt-out from all GoogleAnalytics cookies (from all sites not just from TLC) visit Google.			

These Cookies are used to collect information about how visitors use a TLC site. We use the information to compile reports and to help us improve the site. The Cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

If you would like more information on the Cookies used by our site (and any other site) you can do so from within your web browser by following these steps: www.wikihow.com/View-Cookies

1.1.15 What third party Cookies does this site use?

Third party cookies are used to collect information about how visitors use the website. We use the information to prepare reports and improve the website. Cookies collect information in an anonymous form, for example, information about the number of visitors to the website, how visitors arrived at the website and which pages they visited.

Cookies	Name	Purpose	Expiration
Google Analytics	_gat	Google stores the information collected by cookies on servers in the United States.	On close of current web session
Google Analytics	_ga	Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.	On close of current web session
Google Analytics	_gid		On close of current web session

You can find an overview of privacy at Google [here](#). For information on how to opt-out from all Google Analytics cookies (from all sites not just from TLC) visit Google.

1.1.15 Legal ground for Cookies collecting personal information

Where consent is required for Cookies to be placed on your computer, TLC's use and storage of personal information relating to you provided by the Cookies is based on your consent. You may withdraw your consent at any time by updating your Cookie settings and contacting us at privacy@tlcmarketing.com.

Where consent is not needed for cookies to be placed on your computer (for example, where a cookie is needed for the operation of our website), the use

and storage of any personal information provided by the cookies will be based on legitimate interests. The legitimate interests we are pursuing are the operation of our website and promotion of TLC.