Ascend Travel Group — Privacy Notice

Effective Date: November 20, 2026

Notice at Collection

Ascend Travel Group collects the categories of personal information listed below from you, your travel companions, business clients, Suppliers, and service providers. We use this information to respond to inquiries, plan and book travel, provide customer support, operate and secure our websites and booking tools, communicate with you, meet legal obligations, and, with your permission where required, send marketing communications.

We retain information only for as long as reasonably needed for those purposes, including applicable booking, accounting, tax, regulatory, dispute-resolution, and recordkeeping requirements. As a general guide, booking and financial records are retained for seven years after the relevant transaction or longer if required by law; unconverted leads and chat transcripts are generally retained for up to 24 months; and marketing information is retained until you unsubscribe, plus a limited suppression record. See Section 8 for more detail.

We do not sell personal information, share it for cross-context behavioral advertising, or use sensitive personal information to infer characteristics about you.

1. Who We Are and What This Notice Covers

This Privacy Notice explains how Ascend Travel Group ("Ascend," "we," "us," or "our") collects, uses, discloses, and protects personal information in connection with our travel advisory and booking services.

Ascend Travel Group is a Florida-based travel agency and the privacy contact for information collected through our services. This Notice applies to our websites, including:

- www.ascendtravel.group
- www.goascendtravelgroup.com
- www.yoursunnyescape.com
- Our booking portal at tap14.myagentgenie.com/anthonyortiz
- Our quote and consultation forms, newsletter and VIP list, scheduling flow, site chat assistant, and related communications

This Notice applies when you visit our websites, ask us to plan or book travel, subscribe to communications, contact us, or interact with our services. It also explains how we handle information about travelers whose arrangements are made by a family member, employer, event organizer, or other person.

This Notice does not govern a travel Supplier's or other third party's websites, apps, privacy practices, or handling of information after we provide it to them to fulfill a booking. Those parties act under their own privacy notices and terms. Please review their notices before providing information directly to them.

Ascend has affiliations with travel agency and host or network organizations, including Outside Agents, Atlas Coastal Travel Group, and A. S. A. P. Cruises. Depending on the booking, one or more of these organizations may process information to support agency operations or booking fulfillment, or may handle information under its own privacy notice. The applicable booking documents and Supplier terms identify the parties involved in a particular booking.

2. Information We Collect

The information we collect depends on how you interact with us and the travel services you request.

A. Information you provide

This may include:

- **Identity and contact details:** name, email address, phone number, mailing address, and preferred contact method and time.
- **Travel and booking details:** destinations, departure dates, trip length, departure city, number of travelers, travel preferences, itinerary details, booking history, and comments or requests.
- **Traveler details:** date of birth, passport and government identification details when required for a booking, loyalty and frequent-traveler numbers, and Known Traveler Number, TSA PreCheck, or Global Entry information when you choose to provide it or a service requires it.
- **Emergency contacts:** names and contact details for people you identify as emergency contacts.
- **Payment and billing details:** billing information and payment details submitted through authorized booking portals or payment processors. Payment data is handled by those providers. We do not store full payment card numbers on our public website servers.
- **Communications:** emails, form submissions, calls or messages, newsletter and VIP-list preferences, and information you provide during consultations.
- **Group and corporate travel information:** traveler, attendee, employee, meeting, event, and logistics details provided by a business client or organizer.

B. Sensitive and special-category information

If needed to arrange travel, you may provide information about health, medical conditions, disability or accessibility needs, dietary requirements, pregnancy, service animals, or vaccination status where a destination or Supplier requires it. Dietary requests may reveal or suggest religious beliefs or health information.

We collect this information only when you provide it or when a Supplier requires it to deliver the service you request. We share it only with the relevant Supplier or service provider to the extent needed

to arrange or provide that service. You may ask us to limit its use or sharing, but some services or accommodations may not be available without information the Supplier requires.

Where applicable law requires consent to collect or use sensitive information, we will request that consent. We do not collect biometric data. We do not collect government identification numbers beyond the details a Supplier requires for a booking or travel service.

C. Information collected automatically

When you visit or use our websites or booking tools, we and our providers may collect:

- Internet Protocol (IP) address and approximate location derived from it
- Device, browser, operating system, and language information
- Referring URLs, pages viewed, and interactions with website features
- Dates, times, and duration of visits
- Cookie identifiers and similar online identifiers
- Technical and diagnostic information about website or booking-tool use

D. Information from other sources

We may receive information from:

- Travel Suppliers, booking platforms, and travel service providers
- Host agency, consortium, and agency network organizations, including Outside Agents, Atlas Coastal Travel Group, and A. S. A. P. Cruises
- Payment processors, itinerary tools, customer relationship management (CRM) systems, analytics providers, and marketing providers
- A business client, employer, meeting planner, event organizer, or other person arranging travel for you
- Public authorities or other sources when permitted by law

3. How We Use Information and Legal Bases

We use personal information to:

- Answer questions, provide travel recommendations, prepare quotes, and plan, book, manage, and support travel arrangements
- Coordinate reservations with cruise lines, airlines, hotels, resorts, tour operators, transportation providers, insurers, and activity providers
- Communicate itinerary updates, travel advisories, check-in reminders, service changes, and customer support information
- Manage group, corporate, meeting, and incentive travel
- Process payments through authorized providers, maintain transaction records, and address billing or booking issues

- Operate, maintain, and improve our websites, booking tools, chat assistant, and services
- Protect our business, clients, and systems, including through fraud prevention, security monitoring, troubleshooting, and enforcement of our terms
- Send newsletters, travel tips, promotions, and other marketing communications where permitted and, when required, with your consent
- Comply with applicable laws, travel security requirements, tax and accounting obligations, and requests from public authorities
- Respond to emergencies involving the safety or vital interests of a traveler or another person

Where the General Data Protection Regulation (GDPR) or UK GDPR applies, we rely on the following legal bases, as applicable:

- **Contract:** to take steps at your request before a booking and to perform our agreement to arrange or manage travel.
- **Legitimate interests:** to operate and improve our services, maintain records, prevent fraud, protect systems, provide service communications, and market relevant services to existing customers where permitted. We balance these interests against your rights and may object to or opt out of certain uses as described below.
- **Consent:** for newsletters and other marketing where required, non-essential cookies, marketing texts where required, and sensitive information where consent is the applicable legal basis.
- **Legal obligation:** to meet tax, accounting, seller-of-travel, recordkeeping, travel security, and other legal requirements.
- **Vital interests:** to assist in an emergency or protect someone's life or safety.

You may withdraw consent at any time where we rely on consent. Withdrawal does not affect processing that occurred before withdrawal or processing based on another lawful basis.

4. How We Share Information

We share information only as reasonably needed for the purposes described in this Notice, including with:

- **Travel Suppliers and booking partners:** cruise lines, airlines, hotels, resorts, tour operators, ground transportation and car rental providers, activity and excursion providers, travel insurance providers, and destination service providers.
- **Host agency and network organizations:** including Outside Agents, Atlas Coastal Travel Group, and A. S. A. P. Cruises, as relevant to agency operations or a booking.
- **Travel and business technology providers:** itinerary and CRM platforms, including Travefy where used, booking systems, scheduling services, and customer-support tools.
- **Communications and marketing providers:** email delivery, newsletter, and marketing service providers.
- **Payment providers:** payment processors and financial service providers involved in a transaction.

- **Website, IT, and analytics providers:** hosting, security, technical support, cookie and consent management, and analytics services.
- **Professional advisers:** lawyers, accountants, auditors, insurers, and other advisers who support our business.
- **Business clients and organizers:** where an employer or event organizer arranges travel for employees, attendees, or other participants.
- **Public authorities:** government, customs, immigration, border, law enforcement, and travel security authorities when required by law or mandatory travel security rules. This may include advance passenger information and passenger name record (API/PNR) requirements.

A Supplier or other recipient may use information under its own privacy policy and may act as an independent controller or business. We do not control its practices once it receives information.

We do not sell personal information, rent it, or trade it. We do not share personal information for cross-context behavioral advertising. We do not knowingly sell or share personal information of individuals under 16.

5. Cookies and Similar Technologies

We and our service providers may use cookies, pixels, local storage, and similar technologies. These technologies may fall into the following categories:

- **Strictly necessary:** support core site functions, security, and requested booking or account features.
- **Functional:** remember preferences and improve usability.
- **Analytics:** help us understand site traffic, performance, and how visitors use our services.
- **Marketing:** support marketing measurement or advertising where used and permitted.

Embedded booking widgets and third-party tools may set their own cookies or similar technologies. We do not control those third-party technologies.

We will not set non-essential cookies through our sites unless you have made a choice through the cookie preference mechanism presented on the site, where consent is required. You can change or withdraw your preferences through the site's **Cookie Settings** control, where available, and may also manage cookies through your browser settings. Blocking or deleting cookies may affect site functions, and refusing some cookies may prevent booking widgets or other interactive tools from working properly.

Where required by applicable law, we treat a valid Global Privacy Control (GPC) signal as a request to opt out of sale or sharing for targeted advertising. We do not sell personal information or share it for cross-context behavioral advertising. We do not respond to "Do Not Track" browser signals because there is no commonly accepted standard for interpreting them.

6. International Transfers

Ascend is based in the United States. Travel Suppliers, host or network organizations, and service providers may be located in the United States or other countries, and your information may be transferred to or accessed from those countries to arrange or support travel.

Where applicable law requires a transfer safeguard, we use a recognized mechanism appropriate to the transfer. This may include an adequacy decision, the European Commission's Standard Contractual Clauses, or, for transfers subject to UK law, the UK International Data Transfer Addendum or another permitted safeguard. You may contact us to ask for information about the safeguards used for a particular transfer or to request a copy, subject to permitted redactions.

7. Data Security

We use reasonable administrative, technical, and physical safeguards designed to protect personal information from unauthorized access, loss, misuse, alteration, and disclosure. These measures may include access controls, encryption in transit where supported, vendor due diligence, and staff training.

No internet transmission or electronic storage system can be guaranteed to be completely secure. If a personal data breach occurs, we will investigate and take appropriate steps. Where GDPR or UK GDPR applies, we will notify the relevant supervisory authority within 72 hours of becoming aware of a breach when the law requires notification within that period. We will notify affected individuals as promptly as required by applicable law, including applicable state breach notification laws.

8. How Long We Keep Information

We retain personal information only for as long as reasonably necessary for the purposes described in this Notice, including to complete bookings, provide services, comply with law, resolve disputes, and enforce agreements. Retention periods vary based on the type of information, the service, and applicable requirements.

Our general retention approach is:

- **Booking, itinerary, and traveler records:** generally up to seven years after the booking is completed or the last related transaction, or longer if required for legal, tax, regulatory, dispute, or Supplier recordkeeping purposes.
- **Financial and accounting records:** generally at least seven years after the transaction, or longer if required by applicable law.
- **Passport, identification, and sensitive travel details:** retained only as long as reasonably necessary to arrange or support the relevant travel, and generally deleted or securely removed from our active systems within 30 days after travel is completed unless a continuing service, legal obligation, dispute, or Supplier requirement requires otherwise.
- **Unconverted leads and quote inquiries:** generally up to 24 months after the last meaningful contact, unless you ask us to delete the information or another legal basis requires retention.

- **Chat transcripts:** generally up to 24 months after the interaction, unless needed for an active inquiry, booking, security investigation, or legal matter.
- **Marketing information:** retained until you unsubscribe or withdraw consent. We may keep a limited suppression record so we can honor your opt-out.
- **Cookie and analytics information:** retained according to the settings and retention periods of the relevant cookie or service provider, as described in our cookie preference tool where available.

When information is no longer needed, we will delete, de-identify, or securely dispose of it, subject to applicable legal requirements. If a Supplier or other recipient must retain information under its own policy or legal obligations, that Supplier's retention practices apply to its records.

9. Your Privacy Rights

A. Rights available generally

Subject to applicable law and verification, you may ask us to:

- Confirm whether we process your personal information and provide access to it
- Correct inaccurate or incomplete information
- Delete information that we are not legally or operationally required to retain
- Stop sending marketing communications

To make a request, use the contact details in Section 17 and include **"Privacy Request"** in the subject line. For California residents, use **"California Privacy Request."** We may need to verify your identity and authority before responding. We will respond within the time required by applicable law. For many U.S. state requests, this is generally 45 days, subject to any legally permitted extension. For GDPR or UK GDPR requests, the usual period is one month, subject to permitted extensions.

We may deny or limit a request where the law permits, including where we must keep information to complete a booking, meet a legal requirement, protect security, or establish or defend legal claims.

B. Additional rights under GDPR and UK GDPR

If GDPR or UK GDPR applies to you, you may also have the right to:

- Receive information about the legal basis for processing
- Request a copy of certain information in a portable format
- Request restriction of processing in certain circumstances
- Object to processing based on legitimate interests and to direct marketing
- Withdraw consent where processing is based on consent
- Lodge a complaint with a supervisory authority

Individuals in the European Union or United Kingdom may complain to their local data protection authority or supervisory authority. We do not knowingly offer services to or market to EU or UK residents, but this Notice applies if you interact with us.

We do not make decisions based solely on automated processing that produce legal or similarly significant effects about you.

10. U.S. State Privacy Rights

Depending on where you live and whether applicable law covers our business and the information involved, you may have rights to access, correct, delete, or obtain a copy of personal information, and to opt out of certain processing, such as targeted advertising, sale, or profiling that produces legal or similarly significant effects.

We do not sell personal information or process it for cross-context behavioral advertising. We do not use sensitive personal information to infer characteristics about you. We do not offer financial incentives in exchange for personal information, and we do not knowingly sell or share personal information of minors.

California residents

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, "CCPA"), provides eligible California residents with rights to know, access, correct, and delete personal information, and to opt out of sale or sharing, limit certain uses of sensitive personal information, and not be discriminated against for exercising their rights. We do not sell or share personal information as those terms are defined by the CCPA, and we do not use sensitive personal information to infer characteristics about you.

The categories of personal information we may collect are:

- Identifiers and contact details
- Customer records and information you provide in forms or communications
- Commercial information, such as travel interests, bookings, and booking history
- Internet or other electronic network activity, including website and booking-tool use
- Approximate geolocation derived from an IP address
- Sensitive personal information, such as government identification or travel-related health and accessibility details, when needed for a booking
- Other information you provide in connection with a travel inquiry, booking, or service

We collect these categories from you, your travel companions, business clients or organizers, Suppliers, host and network organizations, payment processors, and technology and service providers. We use them for the purposes described in Section 3. We disclose them to the categories of recipients described in Section 4. We retain them as described in Section 8.

We do not knowingly sell or share personal information of minors under 16. We do not offer a financial incentive for collecting, selling, or retaining personal information.

To exercise California rights, email **anthonyortiz@ascendtravel.group** with **"California Privacy Request"** in the subject line or contact us using the details in Section 17. We will verify and respond to requests as required by law. You may use an authorized agent where permitted by law, subject to appropriate verification.

Residents of other states

Residents of states with comprehensive privacy laws, including Virginia, Colorado, Connecticut, Utah, and other states with similar laws, may have rights to access, correct, delete, or obtain a portable copy of personal information, and to opt out of certain processing where applicable. The availability and scope of these rights depend on the applicable law and whether it covers our processing.

To submit a request, contact us using Section 17. If we deny a request, you may appeal by replying to our decision or sending an email to **anthonyortiz@ascendtravel.group** with **"Privacy Request Appeal"** in the subject line. We will review and respond to an appeal within the period required by applicable law. If your appeal is denied, we will explain any further complaint option available under your state's law.

11. Marketing and Other Communications

You may choose to subscribe to our newsletter, The Upper Deck, or our VIP list to receive travel news, promotions, destination information, and group travel announcements. Signing up is optional. You may unsubscribe at any time using the unsubscribe link in the message or by contacting us.

If you opt out of marketing, we may still send service and transactional communications about an inquiry, quote, booking, itinerary, payment, or travel advisory.

Our commercial email messages will identify the sender and include a way to unsubscribe and the required physical mailing address. We process marketing emails in accordance with applicable law, including the CAN-SPAM Act.

We will obtain consent for marketing calls or texts where required by the Telephone Consumer Protection Act (TCPA) and other applicable laws. If you provide consent to receive marketing calls or texts, including those made using automated technology where applicable, that consent is not a condition of purchasing travel services. Message and data rates may apply. You may revoke consent at any time by replying **STOP** to a text, using another opt-out method provided in the message, or contacting us. Revoking marketing consent does not stop essential service communications.

12. Children's Privacy

Our websites and services are not directed to children under 13, and we do not knowingly collect personal information directly from a child under 13. A parent or legal guardian may provide information

about a child when needed to arrange family travel. If you believe a child under 13 has provided us information directly, please contact us so we can review and take appropriate action.

We may process information about travelers aged 13 to 17 when provided by a parent, guardian, or booking organizer to arrange travel. We handle that information for the booking and related services and do not knowingly sell or share it. Suppliers may set their own age requirements and privacy practices.

13. Third-Party Links, Embedded Tools, and Social Media

Our websites may link to or embed third-party services, including Calendly scheduling, booking engines and widgets, YouTube videos, social media features, Supplier websites, and other travel tools. Those providers may collect information directly from your device, use their own cookies, or receive information when you interact with their services.

We do not control third-party privacy practices. Your use of those services is governed by their own privacy notices and terms. Please review those documents before using an embedded or linked service.

14. Artificial Intelligence and the Site Assistant

Our site chat assistant and any AI-enabled tools process the messages you submit to answer questions, assist with travel inquiries, and help prepare or organize quote requests. Messages may include personal information if you choose to provide it. Chat transcripts may be retained as described in Section 8 and may be processed by providers that support the assistant.

Please do not submit payment card details, passport numbers, or sensitive health information through the chat unless specifically requested through an appropriate channel. A human travel advisor handles bookings and reviews travel arrangements. We do not use the chat assistant to make decisions about you that have legal or similarly significant effects.

15. Global Privacy Control, Do Not Track, and Accessibility

Where required by law, we recognize a valid Global Privacy Control signal as an opt-out request for sale or sharing for targeted advertising. We do not sell personal information or share it for cross-context behavioral advertising. We do not currently respond to Do Not Track signals because there is no common standard for their interpretation.

If you need this Notice in an accessible format or need assistance exercising a privacy right, contact us using the details in Section 17. We will make reasonable efforts to provide an accessible version or other appropriate assistance.

16. Changes to This Notice

We may update this Notice to reflect changes in our services, technology, legal requirements, or privacy practices. We will post the updated Notice on our websites and revise the Effective Date. If a

change is material, we will provide additional notice where required by law, such as by email or through a prominent website notice.

17. Contact Us

For questions, privacy requests, or concerns, contact our Privacy Contact:

Ascend Travel Group
Privacy Contact
Email: **anthonyortiz@ascendtravel.group**
Toll-free: **877-604-6272**
Mail: **[mailing address]**

For general privacy requests, use the subject line **"Privacy Request."** California residents should use **"California Privacy Request."** To appeal a denied request, use **"Privacy Request Appeal."**

This Notice is a general informational document, not legal advice. It should be reviewed by a licensed attorney before publication.