

Privacy Policy — SWT CLUB

Effective Date: May 8, 2026

SWT CLUB is a B2B travel platform engaged in providing travel-related products and services to travel agents, travel partners, tour operators, and associated businesses globally. This Privacy Policy explains how SWT CLUB collects, uses, stores, processes, and safeguards information shared by users, agents, travel partners, suppliers, and visitors while accessing our website, submitting inquiries, onboarding as a partner, making bookings, or using our services and digital platforms.

By accessing or using SWT CLUB platforms and services, you agree to the collection and use of information in accordance with this Privacy Policy.

1. Information We Collect

A. Business & Partner Information

We may collect business-related and onboarding information including:

- **Company name**
- **Registered business address**
- **GST/PAN details**
- **Business registration documents**
- **Accounting and billing details**
- **Trade licenses and verification documents**
- **KYC documentation**
- **Designation and employee details**
- **Official email addresses and phone numbers**
- **Preferred currency and market preferences**
- **Banking details for settlements and refunds**

This information is collected for:

- **Partner onboarding**
- **Verification and compliance**

- **Booking facilitation**
 - **Fraud prevention**
 - **Regulatory obligations**
 - **Financial processing and settlements**
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B. Travel & Booking Information

We may collect travel-related information including:

- **Passenger names**
 - **Passport and visa-related details**
 - **Flight, hotel, and destination preferences**
 - **Travel dates and itineraries**
 - **Emergency contact information**
 - **Special assistance requests**
 - **Dietary or medical preferences voluntarily disclosed**
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C. Technical & Usage Information

When users access SWT CLUB platforms, we may automatically collect:

- **IP addresses**
 - **Browser information**
 - **Device identifiers**
 - **Operating systems**
 - **Website interaction behavior**
 - **Referral URLs**
 - **Cookies and analytics data**
 - **Login activity and session information**
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2. How We Use Your Information

SWT CLUB may use collected information to:

- **Process travel inquiries and bookings**
 - **Coordinate flights, hotels, transfers, activities, and visa assistance**
 - **Facilitate onboarding and verification of travel partners**
 - **Provide operational and customer support**
 - **Process payments, refunds, settlements, and invoices**
 - **Improve website functionality and user experience**
 - **Monitor platform usage and prevent fraud or misuse**
 - **Conduct internal business analysis and reporting**
 - **Comply with legal, financial, and regulatory obligations**
 - **Run marketing campaigns, promotions, and product announcements**
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3. Marketing & Communication Consent

By submitting inquiries, registering accounts, onboarding as a travel partner, or interacting with SWT CLUB platforms, users expressly consent to receiving communications through:

- **WhatsApp**
- **Email**
- **SMS**
- **Phone calls**
- **Platform notifications**

Such communications may include:

- **Booking updates**
- **Operational notifications**
- **Promotional campaigns**
- **Product announcements**

- Travel advisories
- Service-related communications

Users may opt out of promotional communications at any time by contacting SWT CLUB or using unsubscribe options where applicable.

4. Sharing of Information

SWT CLUB may share information with trusted third parties strictly where necessary for operational and service-related purposes, including:

- Airlines
- Hotels
- Destination Management Companies (DMCs)
- Visa processing agencies
- Insurance providers
- Payment gateway providers
- Banking and financial institutions
- Technology and CRM partners
- Government or regulatory authorities where legally required

We do not sell or rent personal or business information to third parties.

Third-party service providers engaged by SWT CLUB are expected to maintain reasonable confidentiality and security standards.

5. Cookies & Tracking Technologies

SWT CLUB uses cookies, tracking technologies, analytics tools, and remarketing pixels including but not limited to:

- Google Analytics
- Meta/Facebook Pixel
- Session tracking technologies

- Advertising and remarketing tools

These technologies help SWT CLUB:

- Analyze website traffic
- Improve user experience
- Monitor platform performance
- Personalize marketing campaigns
- Maintain login sessions
- Improve security and fraud prevention

By continuing to browse or use SWT CLUB platforms, users consent to the use of cookies and similar tracking technologies in accordance with this Privacy Policy.

Users may disable cookies through browser settings; however, certain platform functionalities may become unavailable or impaired.

6. Payment Security

All online payments are processed through secure and encrypted payment gateways.

SWT CLUB does not store complete credit/debit card details on its servers. Payment information is processed through authorized third-party payment processors using SSL encryption and industry-standard security measures.

7. Data Protection & Security

SWT CLUB implements appropriate technical, physical, electronic, and organizational safeguards designed to protect personal and business information against:

- Unauthorized access
- Misuse
- Disclosure
- Alteration
- Destruction

- **Loss of data**

Security measures may include:

- **SSL-secured communication channels**
- **Encrypted payment processing**
- **Restricted internal data access**
- **Password-protected systems**
- **Secure cloud infrastructure**
- **Firewall and monitoring systems**
- **Periodic security reviews**

While SWT CLUB strives to protect all information using industry-standard security practices, no internet-based transmission or storage system can be guaranteed to be completely secure.

7A. Digital Personal Data Protection Act (DPDP) 2023

SWT CLUB acknowledges its obligations under the Digital Personal Data Protection Act 2023 (DPDP Act) and its implementing rules. In our capacity as a Data Fiduciary under the DPDP Act:

- Data Principals (users whose personal data is processed) have the right to access, correct, and erase their personal data, and to nominate a representative to exercise these rights on their behalf.
- Consent for processing personal data may be withdrawn at any time by contacting our Grievance Officer at krishna@swtclub.com. Withdrawal of consent shall not affect the lawfulness of processing carried out before withdrawal.
- Where personal data is transferred internationally, SWT CLUB shall ensure such transfers comply with the approved mechanisms and country lists prescribed under the DPDP Act and its implementing rules.
- SWT CLUB shall update this Privacy Policy as and when implementing rules under the DPDP Act 2023 are notified by the Central Government, to ensure ongoing compliance.

8. Data Breach & Incident Response

In the event of a personal data breach, SWT CLUB shall notify affected Data Principals and the Data Protection Board of India (when operational) within the timelines prescribed under the

DPDP Act 2023 and applicable CERT-In directions. In accordance with CERT-In's Cyber Security Directions (April 2022), cybersecurity incidents shall be reported to CERT-In within 6 hours of detection. SWT CLUB shall also:

- Investigate the incident and mitigate potential risks;
- Restore system security and prevent recurrence;
- Engage cybersecurity professionals, legal advisors, or regulatory authorities as necessary.

- Investigate the incident
- Mitigate potential risks
- Restore system security
- Notify affected parties where reasonably required under applicable laws

SWT CLUB reserves the right to engage cybersecurity professionals, legal advisors, payment providers, or regulatory authorities where necessary to investigate or respond to security incidents.

9. Third-Party Links

SWT CLUB platforms may contain links to external websites, supplier portals, airline systems, or third-party service providers.

SWT CLUB is not responsible for the privacy practices, policies, content, or security of third-party websites or systems. Users are advised to independently review applicable privacy policies before interacting with external platforms.

10. International Data Transfers

As SWT CLUB operates internationally and works with global suppliers, airlines, hotels, destination management companies, and travel partners, information may be processed, stored, or transferred across jurisdictions outside the user's local country where necessary for operational, booking, compliance, or service-delivery purposes.

By using SWT CLUB services, users consent to such international processing and transfer of information.

11. Retention of Information

SWT CLUB retains collected information only for as long as reasonably necessary for:

- **Providing services and operational support**
- **Accounting and financial reporting**
- **Compliance with legal obligations**
- **Fraud prevention and risk management**
- **Internal analytics and business purposes**
- **Dispute resolution and contractual enforcement**

Indicative retention periods by data category:

- **Booking and transaction records: 7 years (GST compliance under CGST Act 2017);**
- **KYC and partner onboarding data: 5 years from end of business relationship;**
- **Marketing and communication consent records: Until opt-out or withdrawal of consent plus 1 year;**
- **Technical and usage logs: Up to 180 days unless required for ongoing investigations.**

12. Your Rights

Users and travel partners may request to:

- **Access personal or business information**
- **Correct inaccurate information**
- **Update account details**
- **Withdraw marketing consent**
- **Request deletion of eligible information**

Requests may be submitted through the official contact details provided below.

Data Access, Correction & Deletion Requests

Deletion or modification requests may be submitted through SWT CLUB's official communication channels.

SWT CLUB may retain certain records where required for:

- Legal compliance
- Financial reporting
- Fraud prevention
- Regulatory obligations
- Dispute resolution
- Contractual enforcement

Eligible requests shall typically be processed within 15–30 business days, subject to verification and applicable legal requirements.

13. Children's Privacy

SWT CLUB services are intended for business entities, travel professionals, and individuals above the age of 18.

Information relating to minors may only be submitted where necessary for travel bookings and must be provided by parents, guardians, authorized agents, or legally authorized representatives.

SWT CLUB does not knowingly collect personal information directly from minors without appropriate authorization.

14. Policy Updates

SWT CLUB reserves the right to modify, update, or revise this Privacy Policy at any time without prior notice.

Updated versions shall be published on SWT CLUB platforms along with the revised effective date. Continued use of SWT CLUB services after such updates shall constitute acceptance of the revised Privacy Policy.

15. Governing Law & Jurisdiction

This Privacy Policy shall be governed by and construed in accordance with the laws of India.

Any disputes arising out of or relating to this Privacy Policy, SWT CLUB platforms, or the use of SWT CLUB services shall be subject to the exclusive jurisdiction of the competent courts located in:

📍 KURUKSHETRA ,HARYANA INDIA

Users agree to submit to the jurisdiction of such courts.

16. Grievance Officer / Data Protection Contact

In accordance with applicable laws and regulations, users may contact SWT CLUB's designated grievance or data protection representative for concerns relating to:

- **Personal data**
- **Privacy requests**
- **Information correction**
- **Deletion requests**
- **Security concerns**
- **Policy-related grievances**

Grievance Officer

Name: Krishna Murthy

Email

krishna@swtclub.com

Contact Number

+918800212080

Response Timeline

SWT CLUB shall make reasonable efforts to respond to valid requests within 7–15 business days.

17. Contact Us

For questions relating to this Privacy Policy or SWT CLUB's handling of information, please contact:

SWT CLUB

Website: www.swtclub.in

Email: info@swtclub.com

Phone: +918800212080

Registered Address: SWT CLUB PRIVATE LIMITED

SCO 1 FIRST FLOOR GURU RAVIDASS DHARAMSHALLA NEAR AMBEDKAR CHOWK
,KURUKSHETRA 136118 ,HARYANA INDIA

18. Related Policies

Users are advised to also review SWT CLUB's:

- **Terms & Conditions**
- **Refund & Cancellation Policy**
- **Disclaimer Policy**
- **Payment Security Policy**

These policies shall form an integral part of SWT CLUB's operational, booking, and compliance framework.