

EXTRA HOLIDAYS CHATGPT APP

PRIVACY POLICY

Last Updated: May 29, 2026

1. DATA CONTROLLER

Travel + Leisure Co., operating under the **Extra Holidays** brand ("we," "us," or "our"), acts as the Data Controller for the processing of personal data described in this Privacy Policy.

Registered Address

Travel + Leisure Co.
6277 Sea Harbor Drive
Orlando, Florida 32821
United States

Privacy Contact

privacy@travandleisure.com

2. PRIVACY & PLATFORM RELATIONSHIP

This Privacy Policy explains how personal data is processed when you use the **Extra Holidays ChatGPT App** made available through the OpenAI platform.

This application operates within the OpenAI ecosystem. Accordingly:

- OpenAI is responsible for account creation, authentication, and platform-level processing under its own terms and privacy policy.
- We do not create or manage user accounts and do not have access to your OpenAI credentials.
- We process only the limited data necessary to generate responses through secure API calls.

We are committed to minimizing data collection and maintaining transparency regarding how your information is handled.

3. PERSONAL DATA WE PROCESS

Depending on your interaction with the application, we may process the following categories of personal data:

Identifiers

Including IP address, device-related metadata, and OpenAI-assigned ephemeral user identifier (`Openai-Ephemeral-User-Id`) and conversation identifier (`Openai-Conversation-Id`). These identifiers are provided by the OpenAI platform on each request and are used as analytics identifiers. They are not linked to your name or OpenAI account credentials by us.

User Query Content

The exact text of each message you submit is captured as a required field ("user_query") on every tool call. This text is transmitted to our first-party analytics collector (Google Cloud Run) and stored in Google Cloud SQL. Where Google Analytics 4 is enabled for the applicable hotel application, a trimmed version of the tool event (excluding raw query text) is also sent to Google Analytics 4.

Search and Booking Parameters

Information you provide or that is inferred from your queries, including: check-in and check-out dates, number of guests and rooms, hotel or property identifiers, chain identifiers, geographic coordinates, and job search criteria.

Internet Activity and Session Data

Interaction logs, request timestamps, response times, tool success or failure status, and a browser-generated session identifier (UUID) transmitted with widget tracking pixel requests.

Structured API Response Data

Normalized availability, rate, and hotel detail responses returned from booking systems are transmitted to our analytics collector alongside your tool call arguments.

Inferred or Aggregated Data

Non-identifiable usage insights used to improve service performance and reliability.

We recommend that you do not include sensitive, confidential, or special-category personal data in your queries.

4. SOURCES OF PERSONAL DATA

We collect personal data from the following sources:

Directly From You

Through the content you submit during chat interactions, including search queries and booking parameters.

Automatically

Through technical metadata generated during use of the application, including IP address, browser session identifier, and request timing data collected via our tracking pixel and analytics infrastructure.

From the OpenAI Platform

OpenAI-supplied request headers, including ephemeral user and conversation identifiers, as part of standard MCP request routing.

5. PURPOSES OF PROCESSING & LEGAL BASES (GDPR)

We process personal data only for the following purposes:

Service Delivery

To generate and return responses requested by the user, including hotel availability, rates, details, amenities, and vacation rental listings.

Legal Basis: Article 6(1)(b) GDPR – Performance of a Contract

Analytics and Service Improvement

To measure tool performance, identify errors, and improve response quality. User query text and full tool argument payloads are retained in our analytics database for this purpose.

Legal Basis: Article 6(1)(f) GDPR – Legitimate Interests

Security and Fraud Prevention

To protect systems, detect abuse, and maintain platform integrity.
Legal Basis: Article 6(1)(f) GDPR – Legitimate Interests

6. DISCLOSURE OF PERSONAL DATA

We share personal data with the following third-party service providers where necessary to operate the service:

- **OpenAI** – platform infrastructure and request routing
- **Google LLC (Google Analytics 4, Measurement Protocol)** – usage analytics; receives tool event names, platform identifier, hotel and chain identifiers, success status, response time, and OpenAI ephemeral user and conversation identifiers
- **Google LLC (Google Cloud Run, Cloud SQL)** – first-party analytics collection and persistent storage; receives the complete MCP tool argument payload (including the user's exact query text, search parameters, and structured API responses), plus IP address and browser metadata
- **Cloudflare, Inc.** – cloud hosting, edge computing (Cloudflare Workers), and database storage (Cloudflare D1); receives worker invocation logs
- **Windsurfer CRS** – hotel availability and booking lookups; receives property identifiers, stay dates, and guest counts
- **Agentic Hospitality NLWeb** – automated natural-language Q&A; receives the user's exact query text and hotel identifier

All third-party providers are contractually required to:

- Process data only on our documented instructions
- Maintain appropriate technical and organizational safeguards
- Comply with applicable data protection laws

We do not sell personal data or share personal data for cross-context behavioral advertising.

7. DATA RETENTION

We apply the following retention practices:

Chat and Tool Data

User query text, search parameters, and full structured API response payloads are transmitted to our first-party analytics collector and stored in Google Cloud SQL. No automated purge schedule is currently configured; data is retained until manually deleted.

Pixel and Visit Data

IP address, browser session identifier, user agent, geolocation data, and tool parameters collected via our tracking pixel are stored in Google Cloud SQL with a 40-minute session deduplication window. No automated deletion schedule is currently configured.

Google Analytics 4 Data

Retained subject to the Google Analytics data retention setting for the applicable GA4 property (default: 14 months from the date of collection). Tool event names, platform identifiers, and analytics identifiers are subject to Google's data processing terms.

Cloudflare Worker Invocation Logs

Retained per Cloudflare account observability settings, typically up to 7 days.

TravelOS Marketplace Audit Log

Operational and administrative events are retained indefinitely in Cloudflare D1 until manually purged.

User Profiles

No persistent end-user profiles are created by us outside of the TravelOS Marketplace administrator system. Marketplace administrator accounts are retained until account deletion is requested.

8. INTERNATIONAL DATA TRANSFERS

Personal data may be processed in the United States and other jurisdictions where our service providers operate, including Google LLC (United States) and Cloudflare, Inc. (United States).

Where required by applicable law, we implement appropriate safeguards, including:

- Standard Contractual Clauses (SCCs)
- Additional contractual, technical, and organizational protections

9. COOKIES & TRACKING TECHNOLOGIES

The Extra Holidays ChatGPT App does not directly place browser cookies on your device.

However, the following tracking mechanisms are in use:

First-Party Tracking Pixel

This application embeds a first-party tracking pixel inside interactive response widgets. Each pixel request transmits the following to our analytics infrastructure: a browser-generated session identifier (UUID), the MCP tool name invoked, the full tool parameter payload (including the user's query text and hotel or property identifiers), and result counts. This pixel is used solely for first-party operational analytics and is not used for advertising or cross-site behavioral tracking.

OpenAI Platform

The OpenAI platform may use cookies for authentication and platform functionality as described in OpenAI's Privacy Policy.

Cloudflare

Cloudflare may process IP address and request metadata for security, performance, and network protection purposes in its capacity as our hosting and infrastructure provider.

We do not use advertising cookies, tracking cookies, or third-party behavioral advertising technologies.

10. YOUR PRIVACY RIGHTS (GDPR & CCPA)

Depending on your location, you may have the following rights:

- Right of Access
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Object to Processing
- Right to Data Portability
- Right to Non-Discrimination (CCPA)

California residents may also request disclosure regarding categories of personal data collected, disclosed, or shared.

To exercise your rights, please contact:

privacy@travelandleisure.com

11. AUTOMATED PROCESSING

We do not engage in automated decision-making or profiling that produces legal effects or similarly significant impacts on individuals.

However, we note that user query text submitted through this application is routed to an automated natural-language processing system (Agentic Hospitality NLWeb) for the purpose of generating informational responses. This processing does not produce decisions with legal or equivalent significance.

12. CHILDREN'S PRIVACY

This service is not intended for individuals under the age of 13 (or 16 where applicable under local law).

We do not knowingly collect personal data from children.

13. SECURITY MEASURES

We maintain appropriate technical and organizational safeguards designed to protect personal data, including:

- Encryption (TLS) for all data in transit
- Access controls and authentication mechanisms
- Secure cloud infrastructure through Cloudflare, Inc. (Workers, D1) and Google LLC (Cloud Run, Cloud SQL)
- Network and edge security protection through Cloudflare, Inc.
- API key authentication for all inter-service communication

We require our service providers to maintain equivalent security standards.

14. SUPERVISORY AUTHORITY

You have the right to lodge a complaint with your local data protection authority if you believe your rights under applicable privacy laws have been violated.

15. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time.

Any updates will be reflected by revising the "Last Updated" date at the top of this Privacy Policy. We encourage you to review this policy periodically to stay informed about how we process personal data.