

Privacy Policy  
October 11, 2016

2016 Consumer Privacy Disclosure

This website is owned and operated by Luxury Vacations in Paradise Inc. We want you to understand what information we gather about you, how we use it and the safeguards we have in place to protect it. This Privacy Policy applies to information collected through this website and otherwise. By using this website and our services, Your User Account, or through an advertisement or linking from a third party site, you consent to this Policy, including your consent to our use and disclosure of information about you as required under current Federal, State, and/or local law, as well as in the manner described below in this Policy.

Any disputes arising from use of this site and/or Luxury Vacations in Paradise, Inc. services, is subject to this Privacy Policy as well as the website's Terms of Use and all of its dispute resolution provisions, including arbitration, limitation on damages and choice of law.

We collect nonpublic personal information about you from the following sources: Information we receive from you on applications or other forms; Information about your transactions with us, our affiliates, or others; and Information we receive from a consumer reporting agency.

We do not disclose any nonpublic personal information about our customers or former customers to anyone, except as permitted by law.

We restrict access to nonpublic personal information about you to those employees who need to know that information to provide our services to you. We maintain physical, electronic, and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

General Terms Amendments / Addendum

Telephone Communications: If you provide us with a cell phone number as a point of contact for your Account, you agree and expressly authorize that we may call that number with autodialing equipment or prerecorded service messages, notwithstanding any state or federal law or regulation that could otherwise prevent us from doing so.

Returned Remittance Fees: If any remittance is not honored upon presentation we may charge your account an amount not exceeding the maximum amount authorized to be charged by law with respect to dishonored checks.

This website is a general audience site and we do not knowingly collect personal information from people under the age of 18. For more information about the Children's Online Privacy Protection Act (COPPA), view the FTC website at <http://www.ftc.gov/>.

1. Information We Collect. We collect personally identifiable information that can identify you such as your name, address, telephone number, mobile number, e-mail address and Social Security Number ("Personally Identifiable Information" or "PII"). We also collect information such as demographic data and data about your online activity on our website that does not identify you ("Non-Personally Identifiable Information" or "Non-PII"). PII and Non-PII are known together as "Information". We may also collect and store Information that you provide to us about other people (such as co-owners), including their name, address, telephone number, mobile devices, email address and Social Security Number.

2. How We Collect Information You Provide.

a. From You. We collect Information you provide to us: in connection with completing your merchant application;

A cookie is a small text file that is stored on a user's computer for record keeping purposes. When you visit our website, we may assign your computer one or more cookies to facilitate access to our website, personalize your online experience and record information about your visit. Through the use of a cookie, we also may automatically collect information about your online activity on our website, such as the web pages you visit, the links or advertisements you click on and other actions you take while on our website. The cookies do not store any PII about you. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies. If you choose to decline cookies, please note that some of the features and services of our website may not function properly. We also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our site; monitoring online promotions; and anti-fraud and information security purposes.

3. How We Use Information.

In General, We may use Information to:

- Deliver the products and services you requested;
- Manage your customer relationship and provide you with customer support

- Research and analyze your use of, or interest in, our products, services and content and the products, services and content offered by others;
- Communicate with you via e-mail, telephone, postal mail and/or mobile devices about products or services that may be of interest to you;
- Develop and display content and services tailored to your interests on our website and other websites;
- Develop and deliver targeted advertisements;
- Measure the overall effectiveness of our online advertising, content, programming and other activities;
- Verify your eligibility and deliver prizes in connection with promotions, contests and sweepstakes;
- Manage our business; and
- Perform functions as described to you at the time of collection.

#### 4. With whom do we share your Information

We only share your information with Vacations Plus Travel.

BE AWARE that Vacations Plus Travel may retain or use your Information whether or not you use their services.

#### 5. Other Situations. We also may disclose your information at our sole discretion:

- In response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise

our legal rights; to defend against legal claims; or as we reasonably believe is required by law. In such cases, we may raise or waive any legal objection or right available to us.

- When we believe disclosure is appropriate in connection with efforts to investigate, prevent or take other action regarding actual or suspected illegal activity or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees or others; or to enforce our websites' terms and conditions or other agreements or policies.
  - In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, asset sale or in the unlikely event of bankruptcy.
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6. Non-Personally Identifiable Information. We may share Non-PII with third parties in our discretion.
7. Third Party Links and Policies. Our website contains links to other websites owned and operated by third parties. These third parties and their servers may be located in the United States or in other countries. We do not control, and are not responsible for, the privacy and security practices of these third parties. We recommend that you review the privacy and security policies of these third parties to determine how they handle Information they may collect about you
8. Special Notice to California Residents. If you are a resident of California, in addition to the rights set forth in this Privacy Policy:
- You have the right to control whether we share some of your personal information. Please read the following information carefully before you make your choices below.

We are required by the California Financial Information Privacy Act to provide this notice to you.

This Privacy Notice applies to Luxury Vacations in Paradise Inc.

#### YOUR RIGHTS

You have the following rights to restrict the sharing of personal and financial information with our affiliates (companies we own or control) and outside companies that we do business with. Nothing in this form prohibits the sharing of information necessary for us to follow the law, as permitted by law, or to give you the best service on your accounts with us. This includes sending you information about some other products or services.

YOUR CHOICES

Restrict Information Sharing with (Affiliates): Unless you say "No," we may share personal and financial information about you with our affiliated companies or subsidiaries.

NO, please do not share personal and financial information with your affiliated companies or subsidiaries.

Restrict Information Sharing With Other Companies We Do Business With To Provide Financial Products And Services: Unless you say "No," we may share personal and financial information about you with outside companies we contract with to provide financial products and services.

NO, please do not share personal and financial information with outside companies you contract with to provide financial products and services.

TIME SENSITIVE REPLY

You may make your privacy choice(s) at any time. Your choice(s) will remain unless you state otherwise. However, if we do not hear from you we may share some of your information with affiliated companies and other companies with whom we have contracts to provide products and services.

To exercise your choices do one of the following:

- Please note that in order for us to process your request, the address you provide below must be a California address you've given to us in relation to your account.

Last name (please print): \_\_\_\_\_

First name: \_\_\_\_\_

Street address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_

Mailing Address (if different than the street address):

City: \_\_\_\_\_ State: \_\_\_\_\_ ZIP: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

We may provide this information in a standardized format that is not specific to you. The designated e-mail address for these requests is [Admin@luxuryvacationsinparadise.com](mailto:Admin@luxuryvacationsinparadise.com).

9. Special Notice to Vermont Residents. We will not share any personal information about you with other Businesses to the extent prohibited by applicable Vermont law or to the extent your prior consent to share is required by applicable Vermont law. For purposes of compliance with the Vermont Consumer Protection Act, if you are a resident of the State of Vermont and would like to opt-out from the disclosure of your personal information to any third-party for marketing purposes, please contact us

[Admin@luxuryvacationsinparadise.com](mailto:Admin@luxuryvacationsinparadise.com). In addition, under Vermont's Fair Credit

10. Updating and Accessing Your Information. The appropriate method(s) for accessing your Information, if any, will depend on which sites or services you have used. Depending on the respective service, you may have the ability to view or edit some of your information online. If you have submitted a merchant application with us, you can update your personal information by contacting our Customer Care Department at [Admin@luxuryvacationsinparadise.com](mailto:Admin@luxuryvacationsinparadise.com).

11. Choices about Collection and Use of Your Information.

a. You can choose not to provide us with certain information, but that may result in the inability to use certain features of our websites or receive certain products or services. Public forums are not intended for the disclosure of PII. To the extent you provide PII in any public forum, it is at your own risk.

12. How we protect your PII. We take industry standard security measures (including physical, electronic and procedural measures) to help safeguard your PII from unauthorized access and disclosure. In addition to the restrictions outlined above, we require employees to comply with information security safeguards, we use encryption in the transmission of your

PII between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your PII.

No system can be completely secure. Therefore, although we take steps to secure your information, we do not promise, and you should not expect that your PII, searches or other communications will always remain secure. Users should also take care with how they handle and disclose their PII. Please refer to the Federal Trade Commission's website for information about how to protect yourself against identity theft.

13. Changes to this Privacy Policy. We may update or modify this Privacy Policy to reflect changes to how we will collect, use and/or share Information. Our Privacy Policy will reflect the date it was last updated. If we make material changes to this Privacy Policy, we will notify you either by prominently posting a notice of such changes before implementing them or by sending you electronic notification of the changes. Please check this Privacy Policy each time you use our websites to ensure you are aware of any changes in our practices. Your continued use of our websites will signify your acceptance of the changes to the Privacy Policy.

14. No Rights of Third Parties. This Privacy Policy does not create rights enforceable by third parties or require disclosure of any PII relating to users of our websites.

15. How to Contact Us. If you have any questions about this Privacy Policy or our information-handling practices, or if you would like to request information about our disclosure of personal information to third parties for their direct marketing purposes, please contact us by e-mail or postal mail as follows:  
[Admin@luxuryvacationsinparadise.com](mailto:Admin@luxuryvacationsinparadise.com).

16. Luxury Vacations in Paradise, Inc. Businesses. For purposes of this Agreement, "You" or "Your" means the person(s) using the Website, and/or the goods, facilities or services of Luxury Vacations in Paradise Inc. ("Site" and/or "Services") and its network of Approval Partners offered through alternative methods, including persons that allow others to provide information about themselves to Luxury Vacations in Paradise Inc. Luxury Vacations in Paradise Inc. may change, remove or add a business in our discretion without notice to you.

