

Privacy Policy

Vacation Resorts International

Your Privacy Rights

Last Updated: November 1, 2012

Vacation Resorts International respects the privacy of the users of its website and has developed this Privacy Policy to demonstrate its commitment to protecting your privacy. This Privacy Policy is intended to describe for you, as an individual who is a user of the Vacation Resorts International website, the information we collect, how that information may be used, with whom it may be shared, and your choices about such uses and disclosures.

We encourage you to read this Privacy Policy carefully when using our websites or services or transacting business with us. By using our websites, you are accepting the practices described in this Privacy Policy. Vacation Resorts International ("VRI") is part of the Interval Leisure Group, Inc. ("ILG") family which also includes but is not limited to Interval International, Worldwide Vacation & Travel, Aston Hotels & Resorts, LLC, Maui Condo and Home, LLC, Trading Places International, LLC and CondoDirect.com.

If you have any questions about our privacy practices, please refer to the end of this Privacy Policy for information on how to contact us.

If you are a resident of California, in addition to the rights set forth above, you have the right to request information from us regarding the manner in which we share certain categories of personal information with third parties for their direct marketing purposes. California law gives you the right to send us a request at a designated address to receive the following information:

1. the categories of information we disclosed to third parties for their direct marketing purposes during the preceding calendar year
2. the names and addresses of the third parties that received that information; and
3. if the nature of the third party's business cannot be determined from their name, examples of the products or services marketed.

We may provide this information in a standardized format that is not specific to you. The designated email address for these requests is admin@vriresorts.com.

Information we collect about you

In General. We may collect personal information that can identify you such as your name and email address and other information that does not identify you. When you provide personal information through our website, the information may be sent to servers located in the United States and other countries around the world.

- **Information you provide.** We may collect and store any personal information you enter on our website or provide to us in some other manner. This includes identifying information, such as your name, address, e-mail address, telephone number and fax telephone number, and, if you transact business with us, financial information such as your payment method (valid credit card number,

- type, expiration date or other financial information). We also may request information about your interests and activities, your gender and age, and other demographic information.
- **Information from other sources.** We may also periodically obtain both personal and non-personal information about you from other ILG businesses (excluding Interval International), business partners, contractors and other third parties and add it to our account information or other information we have collected. Examples of information that we may receive include: updated address information, reservation history, and additional demographic information.

Use of cookies and other technologies to collect information. We use various technologies to collect information from your computer and about your activities on our site.

- **Information collected automatically.** We automatically collect information from your browser when you visit our website. This information includes your IP address, your browser type and language, access times, the content of any undeleted cookies that your browser previously accepted from us (see "Cookies" below), and the referring website address.
- **Cookies.** When you visit our website, we may assign your computer one or more [cookies](#), to facilitate access to our site and to personalize your online experience. Through the use of a cookie, we also may automatically collect information about your online activity on our site, such as the web pages you visit, the links you click, and the searches you conduct on our site. 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 you may not be able to sign in or use some of the interactive features offered on our website.
- **Other Technologies.** We may use standard Internet technology, such as [web beacons](#) and other similar technologies, to track your use of our site. We also may include web beacons in promotional or other e-mail messages or newsletters to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize the services we offer our website visitors to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities.
- **Information collected by third-parties.** We may allow third-parties, including our authorized service providers, advertising companies, and ad networks, to display advertisements on our site. These companies may use tracking technologies, such as [cookies](#) [***embedded link to cookies***], to collect information about users who view or interact with their advertisements. Our website does not provide any personal information to these third parties. This information allows them to deliver targeted advertisements and gauge their effectiveness. Some of these third-party advertising companies may be advertising networks that are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies (www.networkadvertising.org) [***embedded link to networkadvertising.org site***].

How we use the information we collect

In general. We may use information that we collect about you to:

- process your reservation and perform services that you have requested;
- manage your account and provide you with customer support;
- perform research and analysis about your use of, or interest in, our products, services, or content;
- communicate with you by e-mail, postal mail, telephone and/or mobile devices about products or services that may be of interest to you from us;
- develop and display content and advertising tailored to your interests on our site;
- verify your eligibility and deliver prizes in connection with contests and sweepstakes;
- enforce our terms and conditions;
- manage our business and
- perform functions as otherwise described to you at the time of collection.

Financial information. We may use financial information or payment method to process payment for any purchases made on our website, to protect against or identify possible fraudulent transactions, and otherwise as needed to manage our business.

Job applicants. If your personal information is submitted through our website when applying for a position with our company, the information will be used solely in connection with considering and acting upon your application. We may retain your personal information for a period of time, but only for the purpose of considering your application for current or future available positions. This information may be shared with another ILG business for the purpose of evaluating your qualifications for the particular position or other available positions, as well as with third-party service providers retained by us to collect, maintain and analyze candidate submissions for job postings.

With whom we share your information

We want you to understand when and with whom we may share personal or other information we have collected about you or your activities on our web site or while using our services.

Personal information. We do not share your personal information with others except as indicated below or when we inform you and give you an opportunity to opt out of having your personal information shared. We may share personal information with:

- **Authorized service providers:** We may share your personal information with our authorized service providers that perform certain services on our behalf. These services may include processing reservations, providing exchange services, processing credit card payments, providing resort services, delivering packages, providing customer service and marketing assistance, performing business and sales analysis, supporting our website functionality, and supporting contests, sweepstakes, surveys and other features offered through our website. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purposes.

- **Business partners.** By making reservations or purchasing other products on our website which are provided by third parties (such as travel insurance), you consent to our providing your personal information to these business partners. Sharing this information with our business partners allows them to contact you using the e-mail address or other contact information you provided.
- **Other Situations.** We also may disclose your information:
 - 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 otherwise 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 illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our website 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, or asset sale, or in the unlikely event of bankruptcy.

Any third parties to whom we may disclose personal information may have their own privacy policies which describe how they use and disclose personal information. Those policies will govern use, handling and disclosure of your personal information once we have shared it with those third parties as described in this Privacy Policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties. These entities or their servers may be located either inside or outside the United States.

Aggregated and non-personal information. We may share aggregated and non-personal information we collect under any of the above circumstances. We may also share it with our affiliated companies and third parties to develop and deliver targeted advertising on our websites and on websites of third parties. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our resort clients the number of visitors to our website and the most popular resorts, features or services accessed. This information does not contain any personal information and may be used to develop website content and services that we hope you and other users will find of interest and to target content and advertising.

Third-party websites

There may be places on our website where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, the VRI*ety section of our website is operated by our related company Trading Places International. Also, if you click on an advertisement on our website, you may be taken to a website that we do not control. These third-party websites may independently solicit and collect information, including personal information, from you and, in some instances, provide us with

information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the "privacy" link typically located at the bottom of the webpage you are visiting.

How you can access your information

You can review and update your personal information by contacting us. More information about how to contact us is provided below.

If you request that your personal information be removed from our records, we may still retain certain information associated with your account for analytical purposes and recordkeeping integrity, as well as to prevent fraud, collect any fees owed, enforce our terms and conditions, take actions we deem necessary to protect the integrity of our web site or our users, or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies.

Your choices about collection and use of your information

- You can choose not to provide us with certain information, but that may result in you being unable to use certain features of our website because such information may be required in order for you to make reservations, purchase services; participate in a contest, promotion, survey, or sweepstakes; ask a question; or initiate other transactions on our website.
- You will be given the opportunity, in any commercial e-mail that we send to you, to opt out of receiving such messages in the future. It may take up to 10 days for us to process an opt-out request. We may send you other types of transactional and relationship e-mail communications, such as reservation confirmations, service announcements, administrative notices, and surveys, without offering you the opportunity to opt out of receiving them.

How we protect your personal information

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of your sensitive personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your personal information.

We want you to feel confident using our website to transact business. However, 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 personal information, or other communications will always remain secure. Users should also take care with how they handle and disclose their personal information and should avoid sending personal information through insecure email. Please refer to the Federal Trade Commission's website at <http://www.ftc.gov/bcp/menus/consumer/data.shtm> for information about how to protect yourself against identity theft.

Children's privacy

Our website is a general audience site, and we do not knowingly collect personal information from children under the age of 13.

Visiting our websites from outside the United States

This Privacy Policy is intended to cover collection of information on our website from residents of the United States. If you are visiting our website from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy.

No Rights of Third Parties

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of the website.

Changes to this Privacy Policy

We will occasionally update this Privacy Policy to reflect changes in our practices and services. When we post changes to this Privacy Policy, we will revise the "last updated" date at the top of this Privacy Policy. If we make any material changes in the way we collect, use, and/or share your personal information, we will notify you by sending an e-mail to the e-mail address you most recently provided us when making a reservation (unless we do not have such an email address), and/or by prominently posting notice of the changes on our website. We recommend that you check our website from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.

How to contact us

If you have any questions about this Privacy Policy or our information-handling practices, please contact us by e-mail or postal mail as follows:

Customer Relations
Vacation Resorts International
23041 Avenida de la Carolota
Suite 400
Laguna Hills, California 92653
Admin@vriresorts.com

Cookies:

A cookie is a small text file that is stored on a user's computer for record keeping purposes. Cookies can be either session cookies or persistent cookies. A session cookie expires when you close your browser and is used to make it easier for you to navigate our website. A persistent cookie remains on your hard drive for an extended period of time.

Through the use of a cookie, we also may automatically collect information about your online activity on our site, such as the web pages you visit, the links you click, and the searches you conduct on our site. For security purposes, we will encrypt any usernames, passwords, and other user or member account-related data that we store in such cookies. In the case of sites and services that do not use a user or member ID, the cookie will contain a unique identifier. We may allow our authorized service providers to serve cookies from our website to allow them to assist us in various activities, such as doing analysis and research on the effectiveness of our site, content and advertising.

You may delete or decline cookies by changing your browser settings. (Click "Help" in the toolbar of most browsers for instructions.) If you do so, some of the features and services of our website may not function properly. We may allow third-parties, advertising companies, and ad networks, to display advertisements on our site. These companies may use tracking technologies, such as cookies, to collect information about users who view or interact with their advertisements. Our website does not provide any personal information to these third parties, but they may collect information about where you, or others who are using your computer, saw and/or clicked on the advertisements they deliver, and possibly associate this information with your subsequent visits to the advertised websites. They also may combine this information with personal information they collect from you. The collection and use of that information is subject to the third-party's privacy policy. This information allows them to deliver targeted advertisements and gauge their effectiveness. Some of these third-party advertising companies may be advertising networks that are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies (www.networkadvertising.org).

Web Beacons:

Web beacons (also known as clear gifs, pixel tags or web bugs) are tiny graphics with a unique identifier, similar in function to cookies, and are used to track the online movements of web users or to access cookies. Unlike cookies which are stored on the user's computer hard drive, web beacons are embedded invisibly on the web pages (or in email) and are about the size of the period at the end of this sentence.

Web beacons may be used to deliver or communicate with cookies, to count users who have visited certain pages and to understand usage patterns. We also may receive an anonymous identification number if you come to our site from an online advertisement displayed on a third-party website.