Your Privacy Rights

Privacy Policy (Updated 04/09/2018)

ResortStay International, LLC, d/b/a VegasWelcomeCenter.com, ("Company") and its affiliated companies, properties, and clubs (collectively "Affiliates") recognize that privacy is important to customers, members, guests, and other visitors to our websites. Our Privacy Policy describes our practices concerning the collecting and use of information gathered from or about our online visitors and registered users. This Privacy Policy also describes privacy rights you may have under certain laws.

1. Your California Privacy Rights

California Civil Code Section 1798.83 permits customers, members, online users, and others who are California residents and subject to the personal information collection practices of the Company and/or its Affiliates to request certain information regarding the disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please email us at legaldepartment@resortstayintl.com or submit your request in writing to:

Mailing Address (U.S. Mail)
ResortStay International, LLC
Attn: Legal Department
PO Box 231300
Las Vegas, NV 89119

Physical Address (Delivery Services)
ResortStay International, LLC
Attn: Legal Department
235 E Warm Springs Rd., Ste. 107
Las Vegas, NV 89119

Our websites, products, and services are not intended to appeal to minors. However, if you are a California resident under the age of 18, and a registered user of any of our websites or services, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, email us at legaldepartment@resortstayintl.com or submit your request in writing to the appropriate address provided above, with a detailed description of the specific content or information. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

2. Application of this Privacy Policy

This Privacy Policy applies only to the personal and other information and data that is collected from those accessing and using websites where this Privacy Policy is posted, and does not apply to any other information collected by the Company or its Affiliates through any other means. <u>Click here</u> for additional information about the Terms of Use for this website.

3. Information Collected

On our websites, we collect information that you voluntarily provide, as well as other data and information collected from you accessing and using our websites, in order to provide you with products and services, process transactions that you have made, and to communicate with you. We may also use the information collected for other business-related purposes such as to better understand customer and member needs, to enhance customer and member experiences, to analyze, audit or evaluate our systems and processes, to train employees, to offer additional products and services, or to facilitate third party offers that may be of interest. This information and data is collected in various ways, including the following:

A. Information You Provide

- (i) Requests for Information. When you request information related to our products or services, you may be asked to provide personally identifiable information such as your name, street address, phone numbers and email addresses. You may also be asked for information regarding your travel, vacation, and other preferences, as well as information about your marital/cohabitation status, income, gender, and age, and whether you have previously visited a sales center or property managed or operated by the Company or its Affiliates or have used any other products or services offered by the Company or its Affiliates.
- (ii) Comments and Questions. If you send us comments or questions through one of our websites, we may retain information associated with the communication, such as the content, email addresses, and any follow-up communications. This information may also be used to evaluate the service being provided in response to customer and member concerns, to personalize your experience, and to improve our products and services.
- (iii) Making Reservations and Purchasing Packages. When you make a reservation or purchase a rental or vacation package, you may be requested to provide your name, street address, phone numbers, and email addresses, along with other information to assist with your reservation and stay, such as date of arrival/departure, room preferences, accommodation needs, special requests, and credit card and other payment information.
- (iv) Online Accounts. Customers, members, and guests of the Company may have an online account, or be asked to register for an online account, in order to access certain products and services, such as making reservations, receiving special promotional offers, viewing membership account information, paying membership dues and special assessments, and other products and services reserved for members and other account users. When registering or accessing such online accounts, you will need to provide a valid email address, so that we can communicate with you about your online transactions and provide promotional offers and other services. You will also need to create a personal password to protect access to your online account from unauthorized users once your account is established. You can change your password at any time as provided for on the applicable website. Any email addresses, user names, passwords, payment information, personally identifiable information, and other information and data provided in connection with registering, accessing, or using an online account may be collected and retained by us.
- (v) Sweepstakes and Contests. From time to time, we may conduct sweepstakes or contests that offer the opportunity to win prizes. As part of entering a sweepstakes or contest, certain personally identifiable information, such as name, street address, phone numbers, email addresses, and date of birth may be required. You may also be requested to provide additional information, including but not necessarily limited to: marital/cohabitation status; gender; age; income; responses to survey questions; and information relating to your travel, vacation and personal interests. Each sweepstakes and contest also has its own terms and conditions.
- (vi) *Surveys.* From time to time, we may conduct online surveys to better understand the effectiveness of our websites, to assess our performance in providing products and services, or to gauge interest in other products or services. Your participation in these surveys is voluntary. The information collected by us when you participate in a survey may include names, street addresses, phone numbers, email addresses, and other personally identifiable information, as well as other information relating to your preferences and interests.
- (vii) Messaging. Some of our websites may offer a feature that allows you to send a message to, or share information with, others. If you choose to use this feature, you will be asked to provide your name and email address, the recipient's name and email address, and the content of any message you choose to include. As the sender of the message, your name and email address will be retained. The recipient's name and email address will not be retained or used for any other purpose unless the recipient authorizes us to do so.

(viii) *Employment*. If you choose to apply online for employment with us, or to be notified of future employment opportunities, you will be required to provide your name, street address, phone numbers, email addresses, and certain other additional information. You may also have the opportunity to input and/or attach your resume and samples of your work. All such information is retained at least as long as required by law.

B. Information Collected Using Technology

We may also use technology to gather information and data that is used to improve our websites and to enhance the experiences, products, and services offered to customers, members, and other visitors to our websites.

- (i) General. We may automatically track and collect data and information relating to your IP address, domain server, device identifiers, web browser, and computer operating system. We may also use cookies, tags, web beacons, geofencing, and other technologies to: facilitate effective site administration; keep track of your reservations and purchases; remember your account information; and track and understand the frequency and manner with which you visit and use our websites. The data and information we collect is used to: enrich your visits to our websites; evaluate and improve our products and services; provide advertisements and offers; analyze and enhance our marketing efforts; communicate with customers and members; administer your account information; and tailor your personal preferences. Cookies are pieces of data sent to your web browser and operating system. Temporary cookies are designed to stay on your computer only while you are visiting our websites, and non-expiring cookies are stored on your hard drive and allow us to collect information such as: date and time of visits to our websites; time spent on the websites; and pages viewed while on the website. We may place both temporary and non-expiring cookies on your computer. Cookies can also store personally identifiable information, including but not limited to your name, addresses, phone numbers, and email addresses. Your Internet browsers may offer you the option to refuse cookies. However, doing so may affect your use of some portions of our web services. Our websites are also not, at this time, configured to read or respond to "do not track" settings or signals in your browser headings, which vary by browser provider. Please refer to your browser options or other browser instructional materials to learn more about cookie management.
- (ii) Google Analytics and Other Google Technologies. In addition, we may utilize **Google Analytics** or other Google technologies as a means of collecting data and information relating to those accessing and using our websites. Personally identifiable information is not shared with Google through the use of these Google technologies. Information about how **Google Analytics** and other Google technologies collect and process data and options you may have with regard to the collection of such data is available at www.google.com/policies/privacy/partners/.

C. Information Collected from Third Parties

In some situations, we may also team up with third parties in order to provide, expand, or improve the products, services, and experiences offered to customers, members, and other visitors to our websites. For example, when you make a reservation through us or purchase products or services from us, we may need to interact with outside agencies in connection with processing payments, performing customer authentication, or obtaining credit information. We may also elicit information from our Affiliates or other outside companies to assist with marketing efforts, such as those that collect demographic, interest data, and other consumer information. And when you use social media credentials to login to or interact with one or our websites or respond to an offer or promotion, we may collect information about your social media profile, such as your interests, "likes" and friends list. We use this information, for example, to personalize your experiences and our marketing communications, to enhance our products and services, and to better serve you. You can

control this data sharing via options in your social media accounts. We may also obtain contact information and other marketing lead information from our Affiliates, third parties, website "refer-a-friend" options, or social media platforms and may combine it with information we have to contact you for direct marketing offers. In addition, we may obtain information about individuals who are not yet our customers, members, or users of our websites. Information from third parties collected under this Privacy Policy will be treated the same as information that we collected ourselves, and, except as permitted by this Privacy Policy, we will not share such information with other third parties.

4. How Your Information Is Protected

We have technical, administrative and physical safeguards in place to help protect against unauthorized access to, use or disclosure of customer, member, and user information we collect or store. For example, we use secure web pages and encrypted data protocols to protect information transferred through our websites. We do not display or post any images or personal data of customers, members, guests, or users on any of our websites that would be visible to the public without first obtaining written permission and appropriate releases prior to such posting. We also use a third party payment gateway service that enables us to authorize and manage credit card and debit card charges safely via a secure Internet Protocol (IP) connection. Furthermore, employees are trained on the importance of protecting privacy and on the proper access to, and use and disclosure of, customer, member, and user information and data. Under our practices and policies, access to personally identifiable, credit card, and other sensitive information and data is authorized only for those who have a business need for such access. Personally identifiable and other sensitive records are retained only as long as required by law or as otherwise reasonably necessary for business, accounting, tax or legal purposes. Although we strive to protect personal information that we collect, no program is 100% secure, and consequently we cannot guarantee that our safeguards will prevent every unauthorized attempt to access, use or disclose personal information. It is also imperative that you keep your account passwords, membership numbers and any PIN numbers safe and secure. Don't share those with anyone! We maintain security and incident response plans to handle situations involving unauthorized access to private information obtained through our websites and other data collection methods. If you become aware of an issue with the security of information transmitted through any of our websites, please contact us immediately using the contact information provided above in Section 1 of this Privacy Policy, and we will work with you to address any problems.

5. How Your Information Is Used and Shared

A. Sharing Information Among Our Affiliates

Any information or data collected in connection with the access or use of any of our websites or the websites of our Affiliates may be shared among our Company and/or our Affiliates, for a variety of purposes, including but not limited to: communicating with you about your online account(s); communicating with you about matters relating to your memberships or to rental, purchase or other transactions you have made through such websites; providing additional or enhancing customer service; and sending you promotional materials about products and services offered by us or our Affiliates.

B. Sharing Information With Non-Affiliated Third-Parties

We may also share your information, in whole or in part, with the following third-parties: companies that provide advertising, marketing or sales services on our behalf; companies that process and service your accounts; non-financial organizations (such as direct marketing companies and consumer reporting agencies); financial service providers (such as companies engaged in banking, credit card/debit card issuance, administration or processing, consumer financing, or loan processing); companies involved in providing

advertising, marketing, promotional, management, or administrative services to resorts, hotels, condominiums, timeshare clubs, vacation clubs, travel clubs, owner associations, or other properties, clubs or programs connected to the products or services offered by us or our Affiliates; companies that develop, host, maintain or administer websites; companies that help us protect and secure your information and the confidentiality of our records; and other vendors and business partners when it is necessary for them to perform work on our behalf. For example, we may provide your credit card information and billing address to our payment processing company solely for the purpose of processing payment for a transaction you have requested. We require that these third parties protect the customer information we provide to them and limit their use of such customer, member, and user data to the purposes for which it was provided. Occasionally, we may also partner with other companies in joint marketing arrangements or to provide co-sponsored or co-branded promotions, products and services and may share your information with such companies. For example, we may co-sponsor a sweepstakes or contest with other companies, or we may provide prizes for sweepstakes sponsored by other companies. If you enter one of these sweepstakes or contests, we may share your information with the co-sponsor or third-party sponsor. All of these third-parties with whom we share information have contractual obligations with us to maintain the confidentiality of your information and their use of your information is typically restricted to specific business purposes and in accordance with any applicable laws.

C. Other Circumstances When Information May Be Shared

We may share your information when you specifically request it or give us permission to do so. We may also disclose information gathered through our websites or other methods of data collection in other circumstances, such as: to comply with valid legal process including subpoenas, court orders or search warrants, and as otherwise authorized by law; in cases involving danger of death or serious physical injury to any person or other emergencies; to protect our rights or property, or the safety of our customers, members, guests or employees; to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of, or subscription or access to, our products, services, networks, servers, devices, equipment, websites, data, or property; to advance or defend against complaints or legal claims and demands in court, administrative proceedings and elsewhere; to credit bureaus or collection agencies to determine credit risk, for reporting purposes, or to obtain payment for our products or services or those of our Affiliates; to a third-party that you have authorized to verify your account, credit, banking or other information; to outside auditors, regulators, and legal counsel; or upon your request or with your consent. Your information may also be shared in connection with any acquisition, sale, or merger involving our Company or any of our Affiliates or one or more of the business lines, units or functions of our Company or those of any of our Affiliates, regardless of the form of the transaction.

6. Requesting to Not Have Your Personal Information Shared with Non-Affiliated Third Parties

You may direct us to limit the disclosure of personal information about you that we share with non-affiliated third parties. If you elect this opt-out choice, we will not disclose your information to those non-affiliated third parties set forth in Section 5.C above, provided, however, that we may still disclose your personal information to non-affiliated third parties: (i) that perform marketing services on our behalf; (ii) as permitted by law, such as to service providers; (iii) to protect against fraud; and (iv) to protect the security or confidentiality of our records. Please understand that opting out of disclosures to some non-affiliated third parties could impact our ability to deliver certain products or services to you. If you wish to exercise your opt-out choice above, please specify your opt-out choice and notify us by sending an email to memberservices@getawaysresorts.com or by submitting your request in writing to:

Mailing Address (U.S. Mail) ResortStay International, LLC Attn: Member Concierge PO Box 231300 Las Vegas, NV 89119 Physical Address (Delivery Services)
ResortStay International, LLC
Attn: Member Concierge
235 E Warm Springs Rd., Ste. 107
Las Vegas, NV 89119

Please allow approximately 30 to 60 days from our receipt of your Opt-Out Request for it to become effective.

7. Correcting and Updating Stored Personal Information

If you are registered for an online account with us or one of our Affiliates and you find that your information is not current or not accurate, you may try to correct it by editing the information online. If it is information that cannot be edited directly, you may contact our staff at 844-472-7744 for assistance.

8. Protecting the Privacy of Children

Children under the age of 18 should always consult a parent or guardian before sharing any personal details with any company or individual on the Internet. Our Company and our Affiliates do not market its products, services or promotional services to individuals under the age of 18. And, in compliance with the Children's Online Privacy Protection Act, our Company and our Affiliates do not knowingly collect personal identifiable information from children under the age of 13. If a child under the age of 18 has provided us or one of our Affiliates with personal information without parental or guardian consent, the parent or guardian may contact us by sending an email to memberservices@getawaysresorts.com, and we will have the information removed and unsubscribe the child from any promotional contact opportunities.

9. Changes to This Privacy Policy

This Privacy Policy is current as of the effective date stated on this page but may change from time to time. You should visit our websites periodically to view the most current copy of our Privacy Policy.

10. Contacting Us

If you have any questions, you may contact us by emailing memberservices@getawaysresorts.com or by writing us at one of the following addresses:

Mailing Address (U.S. Mail)
ResortStay International, LLC
Attn: Member Concierge
PO Box 231300
Las Vegas, NV 89119

Physical Address (Delivery Services)
ResortStay International, LLC
Attn: Member Concierge
235 E Warm Springs Rd., Ste. 107
Las Vegas, NV 89119

11. Affiliates

For purposes of this Privacy Policy, the term "Affiliates" includes: ResortStay International, LLC (d/b/a Vegas Welcome Center and VegasWelcomeCenter.com); GetAways Resort Management, LLC; Starpoint Resort Group, Inc.; Starpoint Resort Partners, Inc.; Alderwood Resort Management, LLC (a California limited liability company); Alderwood-Colorado, LLC; Alderwood Resort Management, LLC (a North Carolina limited liability company); Condominium Management Services, LLC; and each of their current and future parent, subsidiary and related companies, and each of their assigns and predecessors and successors in interest. For purposes of this Privacy Policy, the terms "Affiliates" also include GeoHoliday Club (d/b/a

Sapphire Resorts), GeoPremiere Resorts (Canada) Ltd., GeoHoliday International, Inc., GeoHoliday, Inc., Haliburton Heights, Ltd., and those membership clubs, home owners associations, timeshare owners associations, condominium associations, and similar entities managed by an Affiliate and each of their assigns and predecessors and successors in interest.