# **Privacy Policy**

This Privacy Policy applies to the InOurCommunity<sup>TM</sup> program provided and operated by BondingPoint LLC ("BONDINGPOINT").

### YOUR PRIVACY IS IMPORTANT TO US

BondingPoint and its Partners are committed to protecting the privacy and personal data received from customers. We want you to know that when you use the InOurCommunity<sup>TM</sup> website and when you provide us with information off-line, the privacy of your personally identifiable information will be respected and protected as set forth herein. While BondingPoint strives to take reasonable measures to protect the privacy of its account holders, this Privacy Policy is not a contract and does not create any legal rights or obligations. Rather, the following are guidelines for protecting the information you provide to us.

With respect to online transactions, this Privacy Policy applies to transactions conducted within the United States on www.InOurCommunity.com.

#### WHAT INFORMATION DO WE COLLECT?

BondingPoint collects and maintains personally identifiable information about members through our websites and through information available to us through websites whose information you have given us permission to access through your participation with the InOurCommunity<sup>TM</sup> program. Personally identifiable information includes, but is not limited to, your name, address, phone numbers, and email address. In addition, when you use our websites, certain user information and site activity data is collected. Further details on the information we collect are described below.

#### **Cookies**

By using one of our websites, some information may automatically be collected by our web servers as you browse our site. We also collect information by using technologies and methodologies that enable tracking, such as "cookies".

Cookies are small bits of information that are stored on your computer by your web browser. Web beacons (also called "pixel tags") are small strings of code placed on a web page or in an email message for the purpose of transferring information. Cookies help establish a user session and allow our server to correctly provide site users with the appropriate information, advertisements and services. Additional information about the use of cookies is described below.

#### Domain names

In general, you can visit most parts of our website without telling us who you are or revealing any information about yourself. Our web servers identify the domain names and IP addresses of visitors, where applicable, but this is not captured as personally identifiable information.

# **Third Party Sites**

As a part of your interactions with the InOurCommunity<sup>TM</sup> website, you may elect to link your InOurCommunity<sup>TM</sup> account to various other networks such as Twitter, Instagram, Foursquare or Facebook. Upon linking InOurCommunity<sup>TM</sup> to those accounts, we will collect some of the information that you provide to those other accounts. The type and amount of information that we receive varies and changes depending on the other networks' own terms and policies. We encourage you to visit the individual privacy policies of those other websites to access their privacy policies. As of July 1, 2014, we will offer you the opportunity to link your InOurCommunity<sup>TM</sup> account to Twitter, Instagram, Foursquare and Facebook. You can access those privacy policies directly here:

Facebook: http://www.facebook.com/about/privacy/

Twitter: https://twitter.com/privacy

Instagram: http://instagram.com/about/legal/privacy/

#### HOW DO WE USE YOUR INFORMATION

BondingPoint uses personal information collected in conjunction with registration, earning of CommunityPoints<sup>TM</sup> or redeeming of CommunityPoints<sup>TM</sup> or from third party websites that you have given us permission to access to provide you with a more effective customer experience. This may include specific messaging or experiences tailored specifically for each user. We also use this information help our partners better engage with you on our website. In order to do this, BondingPoint may process your information or combine it with other information that we have about you or that is publicly available. In addition, BondingPoint may share this information with third parties for the purpose of providing you with services, information or promotional opportunities that may be of interest to you. We require strict contractual obligations from these third parties to ensure safeguards for the privacy and security of the information, which are at least as restrictive as this Privacy Policy in handling your information.

Aggregate information such as demographic information, domain names, other site traffic information, etc. may at times be shared with InOurCommunity partners or other third parties. Examples of aggregate information are X% of experiences redeemed for \$XPoints; X% of subscribers are Yahoo users, etc. Aggregate information does not include personally identifiable information.

### **Emails**

We use email addresses to deliver information relevant to our members, such as earning options, redemption options, surveys, account information, notification services, and for administrative reasons. As an InOurCommunity<sup>TM</sup> member, you occasionally will receive emails about new earning and redemption options, new experiences, new services and other noteworthy news items. We hope you will

find these updates interesting and informative. Of course, if you would rather not receive this information, you may opt-out of receiving such emails as described below.

# Online Surveys and Promotions

We value the opinions of our customers and want to improve your travel experience and our service offerings; therefore, from time to time, we will conduct research surveys. We may also contract with third parties to perform the research, but the use of the customer data by that third party is limited solely to that survey initiative and is protected by a confidentiality agreement.

Generally, unless otherwise stated in the promotion or survey, contact information collected for promotions is used to notify promotion winners, and survey information and results are used to develop improved promotions and other service enhancements.

#### **Submitted Materials**

As a member of the InOurCommunity<sup>TM</sup> program you may choose to participate in one of our Accrual Campaigns by submitting pictures, comments, feedback or communicating with the InOurCommunity<sup>TM</sup> in order to earn CommunityPoints<sup>TM</sup>. At our election, we may choose to use your submitted materials that are a part of any Accrual Campaign, including pictures, as a part of our marketing materials both for InOurCommunity<sup>TM</sup>, BondingPoint and its Partners in general. This may also include additional comments submitted via your connected social media accounts that are a part of a post you make to earn points. Though we may freely use your pictures that are submitted, we will not attribute any specific written comments or feedback provided by you unless we have your prior approval. From time to time BondingPoint team members may contact you for further feedback or endorsement of the site. You will be under no obligation to provide such feedback and if specific feedback is requested, we will inform you if we plan to use it in a public forum such as a part of our marketing materials.

#### Cookies

Cookies help establish a user session and allow our server to correctly provide site users with the appropriate information, advertisements and services. We also use cookies to ensure you obtain the information you request and to authenticate your authority to access the site. If you are a registered user on our site and you elect to have the site store your InOurCommunity<sup>TM</sup> account information, the cookie stored on your computer will contain your InOurCommunity<sup>TM</sup> user name. We also use cookies and web beacons to track the usage of our website in order to improve the site according to our customers' needs.

BondingPoint may enter into agreements with third party companies to serve advertisements and information to site users. BondingPoint may use its cookies and web beacons when working with these companies to provide them information regarding use of the site or to serve you advertisements when you visit our site. These companies may use the non-personally identifiable information about your visit to make available goods and services of interest to you.

In addition, some third-party advertising technology used by BondingPoint to deliver advertisements may employ a separate cookie. This technology may be delivered via visits to our website, email messages, or otherwise. This technology uses non-personally identifiable information about your visits

to this website and other websites as well as information about your methods of communication with us in order to provide you with more relevant information, advertisements, or services. Web beacons on some pages of our site, in conjunction with these advertising cookies and our other cookies, enable the third party advertising technology to better understand onsite activity in the aggregate, to recognize a browser's cookie when a browser visits this site or other sites, and to learn which advertisements bring users to our website or otherwise take action. If you do not want your non-personally identifiable information to be used to provide you with more relevant information, advertisements, or services, you can change the settings on your Internet browser to reject cookies and this will also disable our web beacons. Please consult your chosen Internet browser for instructions on how to change your cookie handling settings.

If you are a registered user on our site and you elect to have the site store your InOurCommunity<sup>TM</sup> account information, the cookie stored on your computer will contain your InOurCommunity<sup>TM</sup> account information. While most people accept cookies, you can configure your browser to not accept cookies from us or from third party companies, like the third party ad servers. If you choose not to accept our cookies, however, and are a registered user, you will not have access to your personal information on this site such as your user profile, itineraries, award travel, upgrades and summary information. It is important to note that some website functionality may not function properly if your browser does not accept cookies.

#### Domain names

Information regarding domain names is aggregated to measure the number of visits, average time spent on the site, pages viewed and similar site usage information in order to know how to improve the site's content

#### Children

To be eligible for an InOurCommunity<sup>TM</sup> Account you must be 18 years of age or be at least 13 years of age and have the consent of an adult. This Privacy Policy shall apply to anyone using the InOurCommunity<sup>TM</sup> site, including children.

# Law Enforcement / Legal processes / Other uses

BondingPoint and its Partners may disclose personal information if required to do so by law, court order, subpoena or other legal process, as requested by a governmental or law enforcement authority, when it is necessary to protect the rights or property of itself, our customers, our websites, or their users, or when we believe in good faith that disclosure is otherwise necessary or advisable.

### How can you access your information?

When logged-in to the InOurCommunity<sup>TM</sup> website, you can view or update your account profile and information.

# How is the information collected online protected?

BondingPoint maintains strict physical, electronic and procedural safeguards to protect personal information and regularly review its security standards and procedures to protect against unauthorized access to personal information. When you place bids to redeem experiences or rewards or access your InOurCommunity<sup>TM</sup> account information, we use secure servers to protect your personal information. Secure Socket Layer (SSL) software encrypts the personal information that is transmitted between you and our websites

Although BondingPoint takes reasonable steps to safeguard and to prevent unauthorized access to your private information, they cannot be responsible for the acts of those who gain unauthorized access, and BondingPoint makes no warranty, express, implied, or otherwise, that they will prevent unauthorized access to your private information.

### How can you opt out?

If you do not want BondingPoint to use or share your personal information for the purpose of sending you email marketing or promotional materials, you can opt out at any time by going to the InOurCommunity<sup>TM</sup> website and update your preferences accordingly. In addition, emails sent to you will also contain a message on how to opt out of that type of communication in the future. Regardless of your opt-out preferences, we reserve the right to send you emails or other electronic messages for administrative purposes.

### Other sites

This Privacy Policy, to the extent it covers Internet use, covers only the InOurCommunity™ website and does not cover any other site. While we make every effort to protect your information on our websites, we do not control the policies of other sites (including those we may link to). We have no control over other sites' privacy policies or use of any personal information you or others may share with them. Please do not assume that our Privacy Policy covers those other sites.

# **Protect your personal information**

In order to protect your privacy and BondingPoint's proprietary databases and systems or those proprietary databases and systems of its technology partners, we recommend that you not share any of your personally identifiable information, such as InOurCommunity<sup>TM</sup> username or password, with any third-party information aggregators that would allow them access to sensitive account information.

### How can you contact us?

If you have comments or questions about this Privacy Policy, please email us via our service provider at info@InOurCommunity.com Please reference this Privacy Policy in those communications.

# Legal effect and changes to the policy

As indicated, this Privacy Policy is not a contract nor does it otherwise create any legal rights or obligations. Rather, this Privacy Policy merely reflects guidelines setting forth BondingPoint's intended business practices. However, by using this website, and/or by providing personal information to BondingPoint online or off-line, you consent to the collection and use of such information by BondingPoint, its affiliates, partners, contractors and permitted agents as herein described and consistent with applicable laws. Also, BondingPoint in its sole discretion, may amend, interpret, modify, or withdraw any portion of this Privacy Policy and related business practices at any time by posting updated text on this site, and your continued use constitutes your consent to those changes. A version of this Privacy Policy has been effective since July 2013 and was last updated in January 2015.

Thank you for taking the time to read this Privacy Policy.