

**Effective January 1, 2016**

## **Privacy Policy**

### **Important Notice Concerning Customer Privacy**

Member Select Vacations, LLC d/b/a/ AAA Exclusive Vacations (“MSV”, “we”, “our”, “us”), cares about the privacy of your information. This Privacy Notice ("Privacy Notice") describes how MSV and its affiliates and members may use or share information about you that is obtained from your interaction with us through access to our website, branches or otherwise. To better protect your privacy, we provide this Privacy Notice explaining our information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it accessible at all times through a link on each web page located at [myexclusivevacations.com/privacy-policy](http://myexclusivevacations.com/privacy-policy) (the "Site"). The term Site also includes your access to any MSV provided mobile application, mobile website or other mobile device connecting to a bona-fide MSV website. By using the Site, you agree to the terms and conditions of this Privacy Notice.

### **The Information We Collect**

Information means any information that you provide to us or that we may collect from other sources, including information you provide when filling out forms, applications, or surveys. This may include your name, gender, date of birth, postal or email addresses, location, telephone or fax numbers, social security or account numbers. This Privacy Notice also applies to all information collected on, or submitted to, the Site. Information also includes any information we collect as a result of utilizing Web Server Log information, Web Browser Sessions, Cookies, IP Address, Pixel Tags, Web Beacons, Clear GIFs or other technologies (collectively "Information"). Information also includes information regarding transactions that you have made as well as demographic information as well as aggregated and de-identified data.

### **We may use Information**

- To respond to your inquiries and fulfill your requests;
- To provide you products or services;
- To deliver marketing communications that we believe may be of interest to you, including ads or offers tailored to you;
- To inform you of important information, products or services you may be interested in, changes in our terms, conditions, and policies and/or other administrative information;
- To send you marketing and promotional communications (electronic or otherwise) that we believe may be of interest to you;
- To personalize your experience;
- To verify your identity and/or location and travels (or the identity, location or travels of your representative or agent) and to make available to you products, services and/or member benefits;

- To allow you to participate in surveys and other forms of market research, sweepstakes, contests, and similar promotions and to administer these activities. Some of these activities have additional rules which may include details about how Information is used for the particular activity;
- For our business purposes, such as data analysis, audits, developing new products and services, enhancing our Site; improving the products and services we provide to you; and identifying usage trends and determining the effectiveness of our promotional campaigns;
- Collected through our social media and other online interactions with you;
- For risk control, to comply with laws and regulations and to comply with other legal process and law enforcement requirements;
- To send to our partners, vendors and agents in connection with fulfilling your request for products or services; and
- To allow you to use features within our Sites by granting us access to information from your device such as geo-location when you request certain services.

### **Information We Share**

We share Information about you with our affiliates, such companies that perform everyday business transactions with us and our marketing partners. From time to time, we may allow affiliates and these companies to extend offers of products and services to you. These companies to which we may disclose the Information we collect may include financial service providers, such as banking, lending and insurance companies, as well as non-financial companies, such as retailers, sellers of consumer products and services, travel vendors and independent marketing companies. We may disclose the Information we collect about you as permitted or required by law. Companies who are not affiliates and outside service providers are required by us to enter into written agreements with us to safeguard the confidentiality of your Information and use it only for authorized purposes.

### **E-Commerce**

When you interact with us or purchase a product online, you will be asked for information needed to complete your request. The information you provide is used, for example, to process your transactions, to create and share reports about these transactions, or to provide related customer service. When you shop online, these purchase transactions are conducted through our vendors, partners, agents and suppliers. Vendors, partners, agents and suppliers engaged by us may have their use of your Information limited by this Privacy Notice, contractual restrictions, or applicable law. However, if a particular website or application is co-branded or developed by a third party, it is possible that another party's privacy notice will govern the treatment of Information on that website or application, including your information. Please check each website's privacy policy to understand such third party's information collection, privacy and use practices.

**We will never sell your Information.**

## Other Information We Collect Online

Other information ("Other Information") is any information we collect online which does not reveal your specific identity. This includes information collected through browsers, Web Server Logs, Cookies, Web Pixels, Web beacons, Clear Gifs and other similar technology. For purposes of this Privacy Notice, Other Information shall be deemed to be a sub-set of Information.

## How We Collect and Use Other Information

- **Web Server Log Information.** We collect "Web Server Log" information when you visit the Site. This includes Internet Domains and Internet Protocol (IP) addresses (e.g., aol.com, company.com, etc.) that you have visited, browser and version, device type, screen resolution, operating system, connection speed, web pages visited or requested, and dates and times of such visits or requests. This Information is collected by our server automatically whenever anyone visits the Site, regardless of whether the user submits any additional contact information. We use this Information to ensure that the Site is functioning properly and for security purposes.
- **Cookies.** Cookies are pieces of information stored directly on the device you are using. We may use cookies (a small text file placed on your computer to identify your computer and browser), and other similar technologies to improve the quality of the Site and to better target and analyze consumer behavior with the goal of providing better and more relevant information. Cookies allow us to collect Information such as browser type, time spent on the Site and web pages visited. We use this Information to recognize your device, to personalize your experience on the Site, to display information related to our products and services more effectively, and for security purposes. We may also use cookies in online advertising to monitor websites in order to select and display which of our online offers is most likely to appeal to you; and monitor your response. Cookies also allow us to gather statistical data about the usage and effectiveness of our Site so that we may consistently improve the features and functionality of the Site. Our cookies do not include your name or anything personal to you. Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, certain features of the Site may not work if you delete or disable cookies and you may not receive certain advertisements or offers that may be of interest to you.
- **IP Address, Pixel Tags, Web Beacons, Clear GIFs or Other Technologies.** We may use "pixel tags" (also called "web beacons" or "clear gifs"), which are tiny graphic images, on our Site and in our emails. Pixel tags help us analyze online behavior and measure the effectiveness of our Site. We may work with third party vendors and agents ("Service Providers") that help us track, collect, and analyze information about online behavior. In addition, pixel tags on our Site may be used to collect Information about your visit, including the pages you view, the features you use, the links you click, and other actions you take in connection with the Site. This information may include your computer's IP address, your browser type and version, your operating system, date and time information, and other technical information about your computer. We may also track certain information about the identity of the websites you visited before coming to our

Site. We do not otherwise track any information about your use of other websites. Your IP address is a number that is automatically assigned to your device that you are using by your internet service provider. An IP address is identified and logged automatically in our Web Server Logs. We use IP addresses, pixel tags, and cookies in our emails that may be used to track your interactions with those messages, such as when you receive, open, or click a link in an email message from us. Some of our Service Providers may use their own cookies and/or pixel tags, web beacons or clear gifs in connection with the services they perform on our behalf.

- **Web Browsers.** Certain web browsers allow you to manage and/or limit a party's ability to collect, track, and analyze information about your online behavior. Please check with the provider of your browser to understand more about this capability.

- **Combinations.** We may combine the Other Information we collect through Web Server Logs, cookies, IP address, pixel tags, web beacons, clear GIFs or other technologies with other Information we have collected from you. Aggregated or de-aggregated data is data that we may create or compile from all various sources. This information is used by us for business purposes, which may include offering products or services tailored specifically to you.

### **Third Party Widgets**

We may allow certain widgets (e.g. social share buttons) on our Sites that enable users to easily share information on another platform such as a social media platform. The third parties that own these widgets may have access to information about your browsing on pages within our Site. You may want to review information at the third party site, such as social media platforms where you have an account to determine how these third parties collect and treat information.

### **Advertising**

We advertise on the Site as well as other websites not affiliated with us. These advertisements may take the form of banner ads or splash ads, ad networks, and re-targeting campaigns. We also use social media to advertise. Information collected through these advertisements by us and our advertising third party Service Providers ("Advertising Service Providers") using cookies and other technologies includes, without limitation, the number of people requesting to look at each page, search engine referrals, and responses to advertisements and promotions on the Site, and affiliated and unaffiliated websites.

### **Service Providers**

You should be aware that we use Service Providers, including Advertising Service Providers, to provide services to the Site and in our offline business operations. The information that you submit to us may be provided to those Service Providers on a confidential basis so that those Service Providers can provide services to us in the course of our business including without limitation, maintaining our database, sending e-mail messages on our behalf, and facilitating promotional and campaign activities on our behalf.

### **Our Commitment to Data Security**

We recognize the importance of safeguarding the confidentiality of your Information. We employ security measures designed to protect your Information from unauthorized access in compliance with applicable law. However, no data transmission over the Internet or other network can be guaranteed to be 100% secure. Therefore, while we strive to protect any Information you transmit on or through the Site, please be advised that MSV, its affiliates, agents or Service Providers assume no responsibility or liability for disclosure of your Information due to errors in transmission, unauthorized third party access, or other causes beyond our control or the control of our affiliates, agents or Service Providers.

### **Our Commitment to Children's Privacy**

Protecting the privacy of children is especially important. For that reason we do not collect or maintain information on our Site from those we actually know are under 13 years old, and no part of our Site is structured to attract anyone under 13 years old. For information about the Children's Online Privacy Protection Act, please visit the Federal Trade Commission website.

### **Links to Third Party Websites and Co-Branded Websites**

Our Site may contain links to third party websites or may be co-branded. Please be aware that MSV is not responsible for and cannot control the privacy practices of other websites or third parties regardless if they are co-branded. We encourage you to read the privacy policies for those other websites, as they may differ from ours. Our Site may also be created and maintained by Service Providers or may contains links to co-branded websites that may display MSV, logo and trademarks but which are maintained by third parties. Such websites may be identified by the fact that they do not display a MSV URL or they may have information identifying a third party as the host of the particular website. Please read the privacy policy on any co-branded or third party websites for the applicable privacy practices relating to Information, and personal information collected via that website, as it may differ from this Privacy Notice. This Privacy Notice applies solely to Information collected by MSV on its Sites where this Privacy Notice is posted.

### **Other Transfers**

We may share Information with businesses controlling, controlled by, or under common control with MSV, LLC.

### **Compliance with Laws and Law Enforcement**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. MSV, reserves the right to disclose Information to government or law enforcement officials or private parties if, in our discretion, we believe it is necessary or appropriate in order to respond to legal requests (including court orders and subpoenas), to protect the safety, property or rights of MSV, or of any third party, to prevent or stop any illegal, unethical, or legally actionable activity, or to comply with the law.

## **Spyware or Adware**

Spyware or Adware refer to applications that are downloaded to your computer. These types of applications deliver ads (usually in the form of pop-up type ads) based on your web usage. We do not participate in any way with spyware or adware applications, and we do not download these types (or any types) of applications without your expressed acceptance. Cookies, pixel tags, web beacons and clear GIFs are not spyware or adware, and they are not harmful to your computer.

## **Social Media and Public Forums**

Please be advised that MSV, may participate on social media platforms, including Facebook® and Twitter®, and may also maintain community pages within its Site. These social media platforms and community pages enable online sharing and collaboration among users. Whenever you post information to any social media platform or any MSV community page or any other online public forums, such information can and may be accessed by the public. This means that any person or entity with access to such information can potentially use it for any purpose, including sending unsolicited communications. We strongly encourage you to not post non-public personal information about you to social media platforms or any other online public forums. We cannot control the use of information disclosed in public forums, such as social media platforms, blogs, forums, wikis, chat rooms, and networking functions of mobile-device applications. You should exercise caution when disclosing information in these public areas, and be careful how you disclose your Information. Content posted in public areas of MSV, including advice and opinions, represent the views and is the responsibility of those who post the content. MSV does not necessarily endorse, support, verify, or agree with the content posted.

## **Business Combinations**

If we should merge or consolidate with another company, or if we should reorganize some part or all of our business, we may be required to disclose your Information in connection with these transactions.

## **Processing in the United States**

We process and store all information in the United States. By using our Site, you agree that the collection, use, transfer, and disclosure of your Information will be governed by the applicable laws in the United States.

## **Privacy Policy Changes**

MSV, may update this Privacy Notice from time to time. You should review this Privacy Notice periodically. If we decide to change this Privacy Notice, we will inform you by posting the revised Privacy Notice on the Site. Those changes will go into effect on the date shown at the top of the revised Privacy Notice. Your continued use of the Site constitutes your consent to our Privacy Notice including any revisions thereto.

## **Phishing**

"Phishing" is a scam designed to steal your personal information. If you receive an email that looks like it is from us asking you for your non-public personal information, do not respond. We will never request your password, user name, bank or credit card account information through email. We may ask you to provide your name, address, date of birth and membership information using email.

## **How to contact us**

For questions about our Privacy Policy, or to make choices about receiving email, promotional and marketing communications, or to update your personal information, you call us toll free at 1.800.222.8252. At that time, you will need to tell us your name, address, phone number and MSV, membership number in order for us to timely process your request. Please also tell us whether you are limiting disclosures on your behalf only or also on behalf of others with whom you have a joint customer relationship. You may also write us at the following address: Member Select Vacations, LLC, 110 Royal Little Drive Providence, RI 02904 Attention: Legal Department