

PRIVATE PLAN

PRIVACY POLICY

Last updated: April 30, 2018

This Privacy Policy explains how we collect, use, process, and disclose your information, when you are booking or supplying travel products and services through the PRIVATE PLAN website. When this policy mentions “PRIVATE PLAN,” “we,” “us,” or “our,” it refers to the PRIVATE PLAN INC. that is responsible for your information under this Privacy Policy (the “Data Controller”).

In this policy, we use a few terms which are defined as follows: A “Member” is anyone who has requested and was granted a PRIVATE PLAN membership, including Guests. A “Guest” is someone who books or seeks to book a travel product or service at the PRIVATE PLAN website. A “Supplier” is someone who offers services (“Supplier Services”) to PRIVATE PLAN. “Travel product or service” means any of our portfolio offerings. “Payment Services” means any payment processing services provided through or in connection with the use of the PRIVATE PLAN website.

1. INFORMATION WE COLLECT

There are three general categories of information that we collect.

1.1. Information you give us.

We collect information you share with us when you use the PRIVATE PLAN website in order to ensure the adequate performance of contracts between you and PRIVATE PLAN, or between you and a Supplier. The provision of this information is necessary to use the PRIVATE PLAN website and, without it, we will not be able to provide you with services that you request.

1. **Basic information.** When you send us your booking request, we require such information as your name and email address.
2. **Authentication-related information.** In order to process your booking, we request your identification information like a photo of your passport or other authentication information.
3. **Payment information.** When you make a payment for a travel product or service to PRIVATE PLAN through a wire transfer, we receive the name of a bank account holder and bank details. When you make a payment for a travel product or service with a card, our payment processor will request your card details, complete address and phone number. Please note we do not see, electronically store, process or transmit any cardholder data on our systems or premises, as all processing of your card data is entirely outsourced to PCI DSS validated third-party service provider.
If you are a Supplier, we require certain financial information, like your bank account, and may require additional information such as your ID or tax ID (where permitted by applicable law), and other proof of identification or verification in order to verify your identity, provide the Payment Services to you, and comply with applicable law.
4. **Communications with PRIVATE PLAN.** When you communicate with PRIVATE PLAN, we collect information about your communication and any information you choose to provide.
5. **Other information.** You may otherwise choose to provide us information (such as your travel plan, itinerary, food allergies, emergency contact information, travel preferences, and information about other guests accompanying you during your travel) when you fill in a form, speak to, or otherwise communicate with a PRIVATE PLAN representative, conduct a search, respond to surveys, participate in promotions, or use other features of the PRIVATE PLAN website and the PRIVATE PLAN Members Club.



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1.2. Information we automatically collect from your use of the PRIVATE PLAN website.

When you use the PRIVATE PLAN website, we collect information about the services you use and how you use them. We process this information for the activities and legal bases described in Section 2 below.

1. **Usage information.** We collect information about your interactions with the PRIVATE PLAN website, such as the pages or other content you view, your searches, bookings you have made, the experiences and activities you book through us, and other actions on the PRIVATE PLAN website.
2. **Location information.** When you use certain features of the PRIVATE PLAN website, we may collect different types of information about your general location (e.g. IP address location city).
3. **Log data.** We automatically collect log information when you use the PRIVATE PLAN website. That information includes, among other things: details about how you've used the PRIVATE PLAN website, IP address location, access times, hardware and software information, device information, device event information (e.g. browser type), and the page you've viewed or engaged with before using the PRIVATE PLAN website.
4. **Transaction information.** We collect information related to your transactions made to PRIVATE PLAN, including the date and time, amounts charged, and type of product or service purchased.
5. **Cookies and similar technologies.** We use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. You may disable the usage of cookies through your browser settings. For more information on our use of these technologies, see our Cookie Policy below.

1.3. Information we collect from third parties.

We may collect information that others provide about you, or obtain information from other sources and combine that with information we collect through the PRIVATE PLAN website. PRIVATE PLAN does not control, supervise or respond for how the third parties process your personal data, and any information request regarding the disclosure of your personal information to PRIVATE PLAN should be directed to such third parties.

1. **Background information.** For certain clients in the United States, to the extent permitted by applicable laws, PRIVATE PLAN may obtain reports from public records of criminal convictions or sex offender registrations. For certain clients outside of the United States, to the extent permitted by applicable laws, PRIVATE PLAN may obtain the local version of background or registered sex offender checks. We may use your information, including your full name and date of birth, to obtain such reports. We will only collect this information where required by applicable laws or where necessary to ensure the adequate performance of our services for you.
2. **Other sources.** To the extent permitted by applicable law, we may receive additional information about you, such as demographic data or fraud detection information, from third party service providers and/or partners and combine it with information we have about you. For example, we may receive background check results, identity verification or fraud warnings from third party service providers for our fraud prevention and risk assessment efforts. We may receive information from our Suppliers' network about you and your activities off the PRIVATE PLAN website, including your experiences and interactions with our Suppliers' networks.

2. HOW WE USE THE INFORMATION WE COLLECT

We use, store, and process information about you to provide, understand, improve, and develop the PRIVATE PLAN website, product and services, and to create and maintain a trusted and safer environment.



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2.1. Provide, improve, and develop the PRIVATE PLAN website.

1. Enable you to access and use the PRIVATE PLAN website.
2. Contact you about your booking requests, plan your travel, and make and manage your bookings.
3. Enable you to communicate with PRIVATE PLAN team members.
4. Operate, provide, improve and optimize the PRIVATE PLAN website and experience, such as by performing analytics and conducting research.
5. Personalize or otherwise customize your experience by ranking search results or showing ads based on your search or booking history, and any preferences you provide to us, or that are signified by your search and booking history.
6. Enable you to access and use the Payment Services, including collecting payment on behalf of a Supplier.
7. Provide customer service.
8. Send you service or support messages, such as updates, security alerts, and other notifications.
9. If you provide us with your contacts' information, we may use and store this information: (i) to facilitate your referral invitations, (ii) for fraud detection and prevention, and (iii) for any other purpose you authorize at the time of collection.

We process this information given our legitimate interest in improving the PRIVATE PLAN website and our users' experience with it, and to ensure the adequate performance of our contract with you.

2.2. Create and maintain a trusted and safer environment.

1. Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity.
2. Conduct investigations and risk assessments.
3. Verify or authenticate information or identification provided by you (such as to compare your identification photo to another photo you provide).
4. Conduct checks against databases and other information sources.
5. Comply with our legal obligations.
6. Resolve any disputes with any of our users and enforce our agreements with third parties.
7. Enforce our Terms of Use and policies.

We process this information given our legitimate interest in protecting the PRIVATE PLAN website, to verify and ensure the adequate performance of our contract with you, and to comply with applicable laws.

2.3. Provide, personalize, measure, and improve our advertising and marketing.

1. Send you promotional messages, marketing, advertising, and other information that may be of interest to you based on your communication preferences (including information about PRIVATE PLAN or partner campaigns and services).
2. Personalize, measure, and improve advertising.
3. Administer referral programs, rewards, surveys, sweepstakes, contests, or other promotional activities or events sponsored or managed by PRIVATE PLAN or its third-party business partners.
4. Carry out profiling on your characteristics and preferences (based on the information you provide to us, your interactions with our services, and your request and booking history) to send you promotional messages, marketing, advertising and other information that we think may be of interest to you. We process this information given our legitimate interest in protecting the PRIVATE PLAN website, to measure the adequate performance of our contract with you, and to comply with applicable laws.



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3. SHARING & DISCLOSURE

3.1. With your consent or where authorized by law.

We may share your information at your direction or as described by us to you at the time of sharing, such as if you, as a Guest, have requested us to connect you with a third party vendor or to purchase services from a third party vendor on your behalf, in connection with your booking (e.g., activities provider), or if you, as a Supplier, have agreed to let us market your products and services through, or refer you to, a third party's platform. In these situations, you are authorizing PRIVATE PLAN to disclose to these third party vendors information required to book them and to receive the relevant services from them. This could include special preferences or requests, and any additional guest information. These third-party vendors are not controlled by PRIVATE PLAN and personal information shared with them is subject to their privacy policies and practices.

3.2. Sharing between Suppliers and Guests.

1. When you as a Guest submit a booking request, certain information about you may be shared with the Supplier to coordinate the booking, such as your name, contact details, and arrival date.
2. When you as a Supplier have a confirmed booking, certain of information about you may be shared with the Guest to coordinate the booking, such as your full name, phone number, address and contact information.

Sharing this information is necessary to provide Guests with our services, and we don't share your billing and payout information.

3.3. Travel product pages and other public information.

The PRIVATE PLAN website publishes information that is visible to the general public. For example travel product and service pages are publicly visible and include information such as travel product or service approximate or exact location, features, description, calendar availability, and any additional information the Supplier chooses to share.

3.4. Service providers.

We use a variety of third party service providers to help us provide services related to the PRIVATE PLAN website and ensure we can adequately provide you with our services. For example, service providers may help us: (i) verify or authenticate your e-mail, (ii) check information against public databases, (iii) assist us with background checks, fraud prevention, and risk assessment, or (iv) provide customer service, advertising, or payments services. These providers have limited access to your information to perform these tasks on our behalf and are contractually obligated to use it consistent with this policy.

3.5. Additional services by Suppliers.

Suppliers may use third party services available through the PRIVATE PLAN website to assist with managing their travel product or providing additional services, such as cleaning services, insurance or activities providers, etc. Suppliers may use features on the PRIVATE PLAN website to share information about the Guest (like the Guest's check-in and check-out dates, name, phone number, and anonymized email address) with that third party service provider for the purposes of coordinating your travel, managing the travel product, or delivering other services.



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3.6. Safety and compliance with the law.

PRIVATE PLAN may disclose your information to courts, law enforcement or governmental authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or if such disclosure is reasonably necessary: (i) to comply with legal process and to respond to claims asserted against PRIVATE PLAN, (ii) to respond to verified requests relating to a criminal investigation or alleged or suspected illegal activity or any other activity that may expose us, you or any other of our users to legal liability, (iii) to enforce and administer our Terms of Use or other agreements with users, guests and PRIVATE PLAN members, (iv) for fraud investigation and prevention, risk assessment, customer support, product development and debugging purposes, or (v) to protect the rights, property or personal safety of PRIVATE PLAN, its employees, its users, guests, PRIVATE PLAN members or members of the public.

We will attempt to notify this person about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon PRIVATE PLAN's property, employees and the PRIVATE PLAN website (collectively, "Risk Scenarios"). In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that person about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no Risk Scenarios apply.

3.7. Widgets.

We may display parts of the PRIVATE PLAN website (e.g., Supplier's product) on sites operated by PRIVATE PLAN business partners, using technologies such as widgets or APIs.

3.8. Tax Authorities.

In jurisdictions where we facilitate the collection and remittance of occupancy taxes, Suppliers and Guests expressly grant us permission, without further notice, to disclose Suppliers' and Guests' data and other information relating to them or to their transactions, bookings, Accommodations and occupancy taxes to the relevant tax authority, including, but not limited to, the Supplier's or Guest's name, travel product or service, transaction dates and amounts, tax identification number(s), the amount of taxes received (or due) by Suppliers from Guests, and contact information.

3.9. Business transfers.

If PRIVATE PLAN undertakes or is involved in any merger, acquisition, reorganization, sale of assets, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your personal information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred and becomes subject to a different privacy policy.

3.10. Aggregated data.

We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other de-identified information for industry and market analysis, regulatory compliance, demographic profiling, marketing and advertising, and other business purposes.



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4. OTHER IMPORTANT INFORMATION

4.1. Analyzing your communications.

We may review, scan, or analyze your communications on the PRIVATE PLAN website for fraud prevention, risk assessment, regulatory compliance, investigation, product development, research, and customer support purposes. For example, as part of our fraud prevention efforts, we scan and analyze messages to mask contact information and references to other websites. In some cases, we may also scan, review, or analyze messages to debug, improve, and expand product offerings. Occasionally we may need to manually review some communications, such as for fraud investigations and customer support, or to assess and improve the functionality of these automated tools. We will not review, scan, or analyze your communications to send third party marketing messages to you, and we will not sell analyses of these communications. These activities are carried out based on PRIVATE PLAN's legitimate interest in ensuring compliance with applicable laws, preventing fraud, promoting safety, and improving and ensuring the adequate performance of our services.

4.2. Google Maps/Earth.

Parts of the PRIVATE PLAN website use Google Maps/Earth services, including the Google Maps API(s). Use of Google Maps/Earth is subject to Google Maps/Earth Additional Terms of Use and the Google Privacy Policy.

5. THIRD PARTY PARTNERS & INTEGRATIONS

The PRIVATE PLAN website may contain links to third party websites or services, such as third-party integrations, co-branded services, or third party-branded services (“**Third Party Partners**”). PRIVATE PLAN doesn't own or control these Third Party Partners and when you interact with them, you may be providing information directly to the Third Party Partner. These Third Party Partners will have their own rules about the collection, use, and disclosure of information. We encourage you to review the privacy policies of the other websites you visit.

6. YOUR CHOICES

6.1. Managing your information.

Where permitted by applicable law, you may request written copies of your personal information held by us.

6.2. Data retention & membership cancellation.

We generally retain your information for as long as is needed to provide the PRIVATE PLAN website to you, or for as long as your PRIVATE PLAN membership is active. If you no longer want us to use your information to provide the PRIVATE PLAN website to you, you may request us to erase your personal information or cancel your membership. To cancel your membership, contact us at members@privateplan.com. If you cancel your PRIVATE PLAN membership or request erasure of your personal information, note that:

1. Because we maintain the PRIVATE PLAN membership to protect from accidental or malicious loss and destruction, residual copies of your information may not be removed from our backup systems for a limited period of time.
2. PRIVATE PLAN may retain certain information to the extent necessary to comply with its legal obligations.
3. PRIVATE PLAN may retain certain information as necessary for its legitimate business interests, such as fraud detection and prevention, enhancing user safety, and defending itself against legal claims. For example, if PRIVATE PLAN removes a member's account for fraud or user safety reasons, PRIVATE PLAN may retain certain information from that account to prevent that user from applying again for a PRIVATE PLAN membership in the future.



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6.3. Withdrawing consent.

In some jurisdictions, applicable law may entitle you to withdraw consent you previously gave to PRIVATE PLAN to process your information and to end your use of the PRIVATE PLAN website by cancelling your membership as described in this section. Additionally, you may have the right to limit the ways in which we use your personal information.

6.4. Data portability.

In some jurisdictions, applicable law may entitle you to request a copy of your personal information that you have provided to us and/or to request us to move such personal information to another service provider. In such cases, and in line with our legal obligations, we will provide you or the service provider with information in a structured and commonly used format.

6.5. Restricting processing.

In certain extraordinary circumstances (e.g. where you think that PRIVATE PLAN is not holding accurate data about you) and in line with applicable law, you may request PRIVATE PLAN to temporarily restrict our use of your personal information for a limited period of time until the extraordinary circumstance that justified the restriction ends.

6.6. Objecting to processing (including automated decision-making).

In some jurisdictions, applicable law may entitle you to require PRIVATE PLAN not to process your personal information for certain specific purposes, such as profiling or marketing purposes.

6.7. Exercising rights and lodging complaints.

If you would like to learn more about or exercise any of, the rights described in this Section 6, contact us at privacy@privateplan.com. We may ask you to verify your identity before taking further action on your request. You have the right to lodge complaints about the data processing activities carried out by PRIVATE PLAN before competent data protection authorities.

7. OPERATING GLOBALLY

As described in this Privacy Policy, we may share your information with our service providers. We provide only the information they need to perform their specific services.

7.1. Service providers.

Where we engage third party service providers to help us provide services related to the PRIVATE PLAN website, we may need to transfer them your personal information for the purposes described in this Privacy Policy. These services providers may be located inside or outside of the European Economic Area (“EEA”), including in countries that are considered to provide a level of data protection equivalent to that provided in the EEA (like Canada) and other countries that do not, including the United States. When transferring your personal information to service providers in these countries, we will ensure that such information is processed there in a manner consistent with this Privacy Policy. When you use the PRIVATE PLAN website, you authorize us to transfer, store and process your information in such countries. Laws in these countries may differ from the laws applicable to the place where you live. By using the PRIVATE PLAN website, you consent to transfer your data to these countries.



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7.2. California residents.

California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year. PRIVATE PLAN does not share personal information with third parties for their own direct marketing purposes without your prior consent. Accordingly, you can prevent disclosure of your personal information to third parties for their direct marketing purposes by withholding consent. If you do opt-in to receiving marketing and other communications from a third party, please be advised that the information you elect to share with that third party will be governed by the third party's privacy policy and terms of service, and we encourage you to review those policies before providing consent for PRIVATE PLAN to share your information.

8. SECURITY

We know how much data security matters to all our clients and Suppliers. With this in mind, we will treat your data with the utmost care and take all appropriate steps to protect it. We are continuously implementing and updating administrative, technical, and physical security measures to help protect your information against unauthorized access, loss, destruction, or alteration.

9. CHANGES TO THIS PRIVACY POLICY

PRIVATE PLAN reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the PRIVATE PLAN website and update the "Last Updated" date at the top of this Privacy Policy. We will also provide you with notice of the modification by email at least thirty (30) days before the date they become effective. If you disagree with the revised Privacy Policy, you may request us to erase your personal information or cancel your membership. If you do not request us to erase your personal information or cancel your PRIVATE PLAN membership before the date the revised Privacy Policy becomes effective, your continued access or use of the PRIVATE PLAN website will constitute acceptance of the revised Privacy Policy.

10. CONTACT

If you have any questions or complaints about this Privacy Policy or PRIVATE PLAN's information handling practices (including how our service providers process your personal information), you may contact our Data Protection Officer at PRIVATE PLAN at privacy@privateplan.com.



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COOKIE POLICY

Last updated: May 2018

PRIVATE PLAN uses cookies and similar technologies to help provide, protect, and improve the PRIVATE PLAN website. This policy explains how and why we use these technologies and the choices you have. A cookie is a small data file that is transferred to your device (e.g. your phone or your computer). For example, a cookie could allow us to recognize your browser, while another could store your preferences. There are two types of cookies used on the PRIVATE PLAN website: (1) “session cookies” and (2) “persistent cookies.” Session cookies normally expire when you close your browser, while persistent cookies remain on your device after you close your browser, and can be used again the next time you access the PRIVATE PLAN website. We also use other technologies with similar functionality to cookies, such as web beacons, pixels, mobile identifiers, and tracking URLs (as described in the Privacy Policy). For example, our email messages may contain web beacons and tracking URLs to determine whether you have opened a certain message or accessed a certain link.

WHY PRIVATE PLAN USES THESE TECHNOLOGIES

We use these technologies for a number of purposes, such as:

1. To enable, facilitate and streamline the functioning of and your access to the PRIVATE PLAN website.
2. To better understand how you navigate through and interact with the PRIVATE PLAN website and to improve the PRIVATE PLAN website.
3. To serve you tailored advertising (on the PRIVATE PLAN website and on third-party websites).
4. To show you content (e.g., advertisements) that is more relevant to you.
5. To monitor and analyze the performance, operation, and effectiveness of the PRIVATE PLAN website and PRIVATE PLAN advertisements.
6. To enforce legal agreements that govern the use of the PRIVATE PLAN website.
7. For fraud detection and prevention, and investigations.
8. For purposes of our own customer support, analytics, research, product development, and regulatory compliance.

THIRD PARTIES

We may also allow certain business partners to place these technologies on the PRIVATE PLAN website. These partners use these technologies to (1) help us analyze how you use the PRIVATE PLAN website, such as by noting the third party services from which you arrived, (2) market and advertise PRIVATE PLAN services to you on the PRIVATE PLAN website and third-party websites, (3) help us detect or prevent fraud or conduct risk assessments, or (4) collect information about your activities on the PRIVATE PLAN website, other sites, and/or the ads you have clicked on. For example, to help us better understand how people use the PRIVATE PLAN website, we work with a number of analytics partners, including Google Analytics. To prevent Google Analytics from using your information for analytics, you may install the Google Analytics Opt-Out Browser by clicking here: <https://tools.google.com/dlpage/gaoptout>.



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ONLINE ADVERTISING

Third parties may also use such tracking technologies to serve ads that they believe are most likely to be of interest to you and measure the effectiveness of their ads both on the PRIVATE PLAN website and on other websites and online services. Targeting and advertising cookies we use may include Google, Facebook and other advertising networks and services we use from time to time. For more information about targeting and advertising cookies and how you can opt out, you can visit the **Network Advertising Initiative's opt-out page** here <http://optout.networkadvertising.org/?c=1>, the **Digital Advertising Alliance's opt-out page** here <http://optout.aboutads.info/?c=2&lang=en>, or <http://youronlinechoices.eu>. To opt out of Google Analytics for display advertising or customize Google display network ads, you can visit the **Google Ads Settings page** here <https://adssettings.google.com/authenticated>. To the extent advertising technology is integrated into the PRIVATE PLAN website and you opt-out of tailored advertising, you may still receive advertising content. In that case, the advertising content will just not be tailored to your interests. Also, we do not control any of these opt-out links and are not responsible for the availability or accuracy of these mechanisms.

THIRD PARTY SOCIAL PLUGINS

The PRIVATE PLAN website may use social plugins provided and operated by third parties, such as Facebook's Like Button. As a result of this, you may send to the third party the information that you are viewing on a certain part of the PRIVATE PLAN website. If you are logged in to your account with the third party, then the third party may be able to link information or actions about your interactions with the PRIVATE PLAN website to your account with them. Please refer to the third party's privacy policies to learn more about its data practices.

YOUR CHOICES

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. Flash cookies operate differently than browser cookies, and cookie management tools available in a web browser will not remove flash cookies. To learn more about how to manage flash cookies, you can visit the Adobe website here <https://www.adobe.com> and make changes at the Global Privacy Settings Panel here http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager02.html.

Your mobile device may allow you to control cookies through its settings function. Refer to your device manufacturer's instructions for more information.

If you choose to decline cookies, some parts of the PRIVATE PLAN website may not work as intended or may not work at all.

