

# Privacy Policy

We understand that making purchases online involves a great deal of trust on your part. We take this trust very seriously, and make it our highest priority to ensure the security and confidentiality of the personal information you provide to us. Please read the following policy to learn about our privacy practices what information we collect from you

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## What information we collect from you

- In General. We receive and store any information you enter on our Web site or give us in any other way. This includes information that can identify you ("personal information"), including your first and last name, telephone number, postal and e-mail addresses, and, in some cases, billing information (such as credit card number, cardholder name, and expiration date). We also may request information about your traveler preferences, including meal requests, seat selection, frequent flyer/hotel/car rental program information, and ticketing options. You can choose not to provide information to us, but in general some information about you is required in order for you to register as a member; purchase products or services; complete a traveler profile; participate in a survey, contest, or sweepstakes; ask us a question; or initiate other transactions on our site.
- Passenger Information. When you make travel or other arrangements for someone else through International Vacations Pass.com or International Vacations, Inc., we will request personal information and travel preferences about that individual. You should obtain the consent of other individuals prior to providing International Vacations Pass.com or International Vacations, Inc. with their personal information and travel preferences, as any access to view or change their information will be available only through your account.
- Information from Other Sources. We also may periodically obtain information about you from our business partners and other independent third-party sources and add it to our account information. Examples of information we may receive include: updated delivery and address information, which we use to correct our records and to facilitate proper delivery of travel information; and demographic information, which we use to better understand your potential purchasing preferences.
- Automatic Information. We automatically collect some information about your computer when you visit International Vacations, Inc... For example, we will collect your IP address, Web browser software (such as Internet Explorer), and referring Web site. We also may collect information about your online activity, such as trips viewed and purchases made. One of our goals in collecting this automatic information is to help customize your user experience.

- Cookies and Other Web Technologies. When you visit International Vacations, Inc., we may assign your computer a "cookie" (a small, unique identifier text file). For example, whenever you sign in as a International Vacations Pass.com or International Vacations, Inc. member, we record your member ID and the name on your member account in the cookie file on your computer. We also may record your password in this cookie file, if you checked the box entitled "Save this password for automatic sign-in." Note that member IDs, passwords, and any other account-related data included in such cookies are encrypted for security purposes. You can always choose not to receive a cookie file by enabling your Web browser to refuse cookies or to prompt you before accepting a cookie. Please note that if you refuse to accept cookies from International Vacations Pass.com or International Vacations, Inc., you may not be able to access many of the travel tools offered by International Vacations Pass.com or International Vacations, Inc.
- Information Collected by Third-Party Advertising Companies. Third-party advertisers, such as those we use to serve ads on our behalf across the Internet, may use cookies and other technologies (such as Web beacons or single-pixel GIFS) for several purposes, including: to measure the effectiveness of their ads; to analyze, modify, and personalize advertising content on International Vacations Pass.com or International Vacations, Inc. and other sites; and to provide ads about goods and services we hope will be of interest to you. We do not have access to or control over cookies or other features they may use, and the information practices of these advertisers are not covered by this Privacy Policy.

## **How we use your information**

International Vacations Pass.com and International Vacations, Inc. uses sensitive billing information (such as cardholder name, credit card number, and expiration date) for the purpose of completing the travel purchases you conduct on our site. We use other information about you for the following general purposes: to provide you with the products and services you request; to provide you with travel confirmation and updates; to manage your account, including processing bills and providing travel notifications; to communicate with you in general; to respond to your questions and comments; to measure interest in and improve our products, services, and Web site; to notify you about special offers and products or services that may be of interest to you; to otherwise customize your experience with International Vacations, Inc.; to reward you as part of any reward and recognition program you choose to join; to solicit information from you, including through surveys; to resolve disputes, collect fees, or troubleshoot problems; to prevent potentially prohibited or illegal activities; to enforce our Terms of Use; and as otherwise described to you at the point of collection.

Please review "Your choices with respect to the collection and use of your information" below.

## **With whom we share your information**

International Vacations Pass.com and International Vacations, Inc. may share your information with the following entities:

- Suppliers, such as hotel, airline, cruise, or car rental companies, or activity providers, who fulfill your travel reservations. Throughout International Vacations Pass.com and International Vacations, Inc., all services provided by a third party supplier are described

as such. We do not share your email address with these suppliers unless they need it to fulfill the travel reservation you have made on International Vacations Pass.com or International Vacations, Inc.), and we restrict their use of this information to that purpose. We do not place limitations on our suppliers' use or disclosure of your other personal information. Therefore, we encourage you to review the privacy policies of any travel supplier whose products you purchase through International Vacations Pass.com and International Vacations, Inc... Please note that these suppliers also may contact you as necessary to obtain additional information about you or to facilitate your travel reservation.

- Third-party vendors who provide services or functions on our behalf, including credit card processing, business analytics, customer service, marketing, distribution of surveys or sweepstakes programs, and fraud prevention. These companies have access to personal information needed to perform their functions but are not permitted to share or use the information for any other purpose.
- Business partners with whom we may jointly offer products or services. You can tell when a third party is involved in a product or service you have requested because their name will appear with ours. If you choose to access these optional services, we may share information about you, including your personal information, with those partners. Please note that we do not control the privacy practices of these third-party business partners and recommend you evaluate their practices before deciding to provide your personal information.
- Companies within the International Vacations, Inc. family. Sharing this information with our U.S. corporate affiliates, including International Vacations and International Vacations Pass.com enables us to provide you with information about products and services, both travel-related and other, which might interest you. To the extent that our corporate affiliates have access to your information, they will follow practices that are at least as restrictive as the practices described in this Privacy Policy. They also will comply with applicable laws governing the transmission of promotional communications and, at a minimum, give you an opportunity in any commercial e-mail they send to choose not to receive such e-mail messages in the future.

We also may share your information:

- In response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.
- When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of International Vacations Pass.com and International Vacations, Inc., our customers, or others; and in connection with our Terms of Service and other agreements.
- In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Other than as set out above, you will be notified when personal information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information.

We also may share aggregate or anonymous information with third parties, including advertisers

and investors. For example, we may tell our advertisers the number of visitors a Web site receives or what are the most popular vacation destinations. This information does not contain any personal information and is used to develop content and services we hope you will find of interest.

### **Your choices with respect to collection and use of your information**

- As discussed above, you can choose not to provide us with any information, although it may be needed to make travel purchases or to take advantage of certain features offered on International Vacations Pass.com or International Vacations, Inc.
- When you register as a member on Twoforonevacations.com or International Vacations, Inc. you will be given a choice as to whether you want to receive e-mail messages from International Vacations Pass.com or International Vacations, Inc. about special offers. As a registered International Vacations Pass.com or International Vacations, Inc. member, you can modify your choice at any time on the My Account page under the heading "E-mail settings." Whether registered as International Vacations Pass.com or International Vacations, Inc. member or not, you also will be given the opportunity to unsubscribe from commercial messages in any such e-mail we send. Please note that we reserve the right to send you other communications, including service announcements, administrative messages, and surveys relating either to your International Vacations Pass.com or International Vacations, Inc. account or to your transactions on International Vacations Pass.com or International Vacations, Inc., without offering you the opportunity to opt out of receiving them.
- The Help portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. Please note that if you refuse to accept cookies from International Vacations Pass.com or International Vacations, Inc., you will not be able to access portions of our site.

### **How we protect your information**

We want you to feel confident about using International Vacations Pass.com or International Vacations, Inc. to plan and purchase your travel, so we are committed to protecting the information we collect. While no Web site can guarantee security, we have implemented appropriate administrative, technical, and physical security procedures to help protect the personal information you provide to us. For example, only authorized employees are permitted to access personal information, and they only may do so for permitted business functions. In addition, we use encryption when transmitting your sensitive personal information between your system and ours, and we employ firewalls and intrusion detection systems to help prevent unauthorized persons from gaining access to your information.

This website takes every precaution to protect our users' information. When users submit sensitive information via the website, their information is protected both online and off-line.

While we use SSL encryption to protect sensitive information online, we also do everything in our power to protect user-information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the

information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to personally identifiable information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added, our employees are notified and/or reminded about the importance we place on privacy, and what they can do to ensure our customers' information is protected.

This Site has security measures in place to protect the loss, misuse and alteration of the information under our control. Our data center uses a wide range of physical security features, including state-of-the-art smoke detection and security breach alarms.

#### Account Information

We send the user financial account notices (such as monthly statements or overdue invoices). Users are not able to un-subscribe from these notices, which contain important information about their account. We communicate issues relating to their account via email, fax, USPS and phone. In certain cases, account information may be shared with collection agents.

#### Correction/Updating Personal Information

If a user's personally identifiable information changes (such as your zip code), or if a user no longer desires our service, we provide a way to correct, update or remove that user's personal data provided to us. This can be done at the user's Account Administration page or by contacting Technical Support.

#### Notification of Changes

If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will notify users by way of an email. Users will have a choice as to whether or not we use their information in this different manner. We will use information in accordance with the privacy policy under which the information was collected.

#### **Children's privacy**

International Vacations Pass.com or International Vacations, Inc. does not sell travel or other services for purchase by children. Should a child whom we know to be under 18 years of age send personal information to us, we will use that information only to respond directly to that child to inform him or her that we must have parental consent before receiving his or her personal information.

#### **External Links**

If any part of the International Vacations Pass.com or International Vacations, Inc. Web site links you to other Web sites, those Web sites do not operate under this Privacy Policy. We

recommend you examine the privacy statements posted on those other Web sites to understand their procedures for collecting, using, and disclosing personal information.

### **Changes to this Privacy Policy**

International Vacations Pass.com or International Vacations, Inc. may update, revise or replace this Privacy Policy in the future at will with no prior notice.

### **How you can contact us**

If you have questions about either Privacy Policy (or your travel planning or purchases), please e-mail us at [info@internationalvacations.com](mailto:info@internationalvacations.com)

This Privacy Policy is effective as of October 4, 2016.