



PRIVACY POLICY

Effective Date: February 16, 2017

Great Getaways Travel (“GGA”) respects your concerns about privacy. This Privacy Policy describes the types of personal information we collect about consumers, how we may use the information, with whom we may share it, and the choices available to consumers regarding our use of the information. The Privacy Policy also describes the measures we take to safeguard the personal information and how individuals can contact us about our privacy practices.

Our privacy practices may vary in the countries in which we operate to reflect local practices and legal requirements.

Information We Obtain. We obtain certain personal information in connection with the services we provide. The types of personal information we obtain include:

- Contact information, such as name, postal address, email address and telephone number;
- online password and other log-in details;
- payment information, such as name, billing address and payment card details (including card number, expiration date and security code);
- booking information;
- information about travel plans, interests, preferences and agency and advisor affiliation;
- demographic information we acquire from third parties; and
- other personal information in content you provide to us on our websites, such as in comments to our blog posts and feedback

In addition, when you visit our websites, we obtain certain information by automated means, such as cookies, web server logs and web beacons. The information collected in this manner includes IP addresses, operating systems type, browser type, domain and other system settings. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. Through these automated collection methods, we collect “clickstream data,” which is a log of content on which a visitor clicks while browsing a website. As the visitor clicks through the website, a record of the action may be collected and stored. If you wish to disable the storage of cookies on your device, you may do so using the settings on your browser or device. Please note, however, that without cookies you may not be able to use all of the features of our websites. For more information on deleting or controlling cookies, visit www.aboutcookies.org.

How We May Use the Consumer Information We Obtain. We may use the consumer information we obtain to:

- Create and manage your profile and account;
- offer and provide products and services to you, such as hotel bookings and marketing

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- materials;
- communicate with you about, and administer your participation in, surveys, events, programs, contests, promotions and other offers;
 - communicate with you on behalf of our Member Agencies and preferred suppliers;
 - display content on our websites;
 - respond to and communicate with you about your inquiries and requests, and provide information you request;
 - process claims we receive in connection with our products and services;
 - operate, evaluate and improve our business (including developing new products and services; enhancing and improving our services; managing our communications; analyzing our products; and performing accounting, auditing, billing reconciliation and collection activities and other internal functions);
 - perform data analyses (including market and consumer research, trend analysis, financial analysis, and anonymization of personal information);
 - protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
 - comply with and enforce applicable legal requirements, relevant industry standards and our policies.

In addition, we use information collected online through cookies, web beacons and other automated means for purposes such as (i) customizing our users' visits to our websites and (ii) managing our business. We also use this information to help diagnose technical and service problems, administer our websites, identify users of our websites, and gather demographic information about our users. We use clickstream data to determine how much time users spend on web pages of our websites, how users navigate through our websites, and how we may tailor our websites to better meet the needs of our users.

We also use third party web analytics services on the websites, such as those of Google Analytics, Hotjar and Optimizely. The service providers that administer these services use technologies such as cookies, web server logs and web beacons to help us analyze how visitors use the websites. The information collected through these means (including IP address) is disclosed to these service providers, who use the information to evaluate use of the websites. To learn more about Google Analytics, Hotjar and Optimizely and how to opt out, please visit www.google.com/analytics/learn/privacy.html, <https://www.hotjar.com/opt-out> or https://www.optimizely.com/opt_out/.

We also may use the information we collect about you in other ways for which we provide specific notice at the time of collection.

Online Tracking. On our websites, we collect information about your online activities to provide you with advertising about products and services tailored to your individual interests. This section of our Privacy Policy provides details and explains how to exercise your choices.

You may see certain ads on other websites based on your visits to our websites because we participate in advertising networks administered by third-party vendors. Ad networks allow us to

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target our messaging to users considering demographic data, users' inferred interests and browsing context. These networks track your online activities over time by collecting information through automated means, including through the use of cookies, web server logs and web beacons. The networks use this information to show you advertisements that are tailored to your individual interests, to track your browser across multiple websites, and to build a profile of your web browsing. The information our ad network vendors collect includes information about your visits to websites that participate in the vendors' advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our websites and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts. Our websites are not designed to respond to "do not track" signals received from browsers.

We utilize Google Display Advertising (such as Remarketing with Google Analytics, Google Display Network Impression Reporting, DoubleClick Campaign Manager integration, and Google Analytics Demographics and Interest Reporting) to (1) show you our ads on other websites based on your prior visits to our websites, and (2) better understand our ad impressions and use of ad services. In connection with the Google Analytics Demographics and Interest Reporting service, we may use data from Google's interest-based advertising or third-party audience data (such as age, gender and interests) with Google Analytics to understand and improve our marketing campaigns and website content.

Some of our online advertising takes place through Google Display Advertising. As part of this program, we use Google Analytics features such as retargeting. In connection with that feature and others offered by ad networks, we and the operators of ad networks, including Google, may use third-party cookies (such as the DoubleClick cookie) to inform, optimize and serve ads across the Internet based on a user's past visits to our websites. We also may show you ads from some of our affiliates when you visit our websites. You can opt out of Google Ads by clicking [here](#).

Information We Share. We do not sell or otherwise share personal information about you, except as described in this Privacy Policy. We share the personal information we obtain with third parties who perform services on our behalf, such as ad network vendors. These third parties are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. In addition, we share consumer personal information with Virtuoso Member Agencies (i.e., travel agencies that are members of Virtuoso's network of agencies) to provide the services you request and with preferred suppliers to collaborate on special offers for Member Agency clients.

We also may disclose information about you (i) if we are required to do so by law, regulation or legal process (such as a court order or subpoena), (ii) in response to requests by government agencies, such as law enforcement authorities, (iii) for the purpose of or in connection with legal proceedings, or otherwise for the purpose of establishing, exercising or defending our legal rights, or (iv) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

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Data Transfers. We may transfer the personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to recipients in other countries (such as the U.S.), we will protect that information as described in this Privacy Policy and will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries other than the one in which you provided the information.

By submitting personal information to us you consent to the transfer of your personal information to countries that may not have the same data protection laws as the country in which you initially provided the information. If you do not want your personal information transferred as indicated here, please do not submit any information to us.

If you are located in the European Economic Area (“EEA”), with respect to transfers of personal information to the U.S., Virtuoso is certified under the EU-U.S. Privacy Shield framework developed by the U.S. Department of Commerce and the European Commission regarding the transfer of personal information from the EEA to the U.S. [Click here](#) to view our EU-U.S. Privacy Shield Privacy Policy.

Your Choices. We offer you certain choices in connection with the personal information we obtain from you, such as how we use the information and how we communicate with you. To update your preferences, ask us to remove your information from our mailing lists or submit a request, please contact us as specified in the How to Contact Us section of this Privacy Policy. You may unsubscribe from receiving future marketing and promotional emails by clicking on the unsubscribe link provided in our emails. We may still contact you to respond to an inquiry and for certain account-related or transactional purposes.

Notice to California Residents. Subject to certain limits under California law, California residents may ask us to provide them with (i) a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. To make this request, California residents may contact Virtuoso as specified in the How to Contact Us section below.

Links to Other Websites. Our websites may contain links to other websites for your convenience and information. Linked websites may have their own privacy policies or notices, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites are not owned or controlled by us, we are not responsible for their content, any use of the websites, or the privacy practices of the websites.

How We Protect Our Personal Information. We maintain administrative, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

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Access and Correction. To the extent provided by the law of your jurisdiction, you may (i) have the right to access certain personal information we maintain about you, (ii) request that we update or correct inaccuracies in that information, (iii) object to our use of your personal information, and (iv) ask us to block or delete your personal information from our database. To exercise these rights, please contact us as indicated in the How To Contact Us section of this Privacy Policy. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

Updates to Our Privacy Policy. This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a notice on our websites to notify you of any significant changes to our Privacy Policy and indicate at the top of the notice when it was most recently updated.

How to Contact Us. If you have any questions about this Privacy Policy, or if you would like us to update information we have about you, change your preferences or exercise other applicable data protection rights, please contact us by e-mail at info@ggatravel.com by phone at 1.617.720.6100 or write to us at:

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