

# RCI PRIVACY NOTICE

Last Updated: April 6, 2018

RCI, LLC cares about privacy issues and wants you to be familiar with how we collect, disclose, and otherwise use (“**Process**”) information about you. This privacy notice (“**Privacy Notice**”) describes our practices in connection with information we collect through our websites (“**Websites**”), social media pages we control (“**Social Media Pages**”), and software applications we make available for use on or through computers and mobile devices (“**Apps**”), that include a link to this Privacy Notice, and through any of our offline activities, such as when you provide your information on the phone via our call centers or in person (“**Offline Activities**”) (collectively, including the Websites, Apps, Social Media Pages, and Offline Activities, the “**Services**”).

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements, such that our practices may be more limited in such jurisdictions.

Please read the following to learn more about our privacy practices.

## What Information Is Collected and How Is It Collected?

### 1. We may collect “**Personal Information**” (information that identifies you or relates to you as an identifiable person) about you such as your:

- Name
- Postal address (including billing and shipping addresses)
- Phone number
- Email address
- Credit or debit card number
- Financial information
- Social media account information
- Stay, trip, product, service or related information, such as your preferred location/facilities, dates and number of people/children travelling with you
- Special needs or conditions that may impact your stay
- Driver’s license, government-issued ID, or passports
- Geolocation information
- Communication, product, service or other preferences
- Demographic information
- IP address or Device ID
- Subscribing Membership ID

### 2. We may collect information from you when you interact with us such as when you:

- Register for, use, or make a payment for a product or service
- Contact us with a question or request
- Use our Services
- Make a reservation
- Stay at one of our affiliated resorts

- Provide a testimonial or story, or post or submit a photo, review or comment
- Participate in a competition, promotional activity or sweepstakes
- Participate in any loyalty or other programs
- “Like”, “Follow” or otherwise connect with or post to one of our Social Media Pages

### 3. Other information we collect about you:

- **Cookies:** Our Services may use “cookies” and similar technologies (collectively, “cookies”). Cookies are small text files this Website sends to your computer for recordkeeping purposes; this information is stored in a file on your computer’s hard drive. Cookies make web surfing and browsing easier for you by saving your preferences so we can use these to improve your next visit to our Website.
  - One purpose of cookies is to simplify the use of the Website. For example, cookies may save a user’s login details, so that they do not need to login every time.
  - Cookies may be either “persistent” or “temporary” (or “session”) cookies. A persistent cookie retains user preferences for a particular Website allowing those preferences to be used in future browsing sessions and remains valid until its set expiry date (unless deleted by the user before the expiry date). A temporary cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
  - Cookies are also used for statistical or marketing purposes, to determine how the Website is used. These cookies are provided by us or by third parties (e.g., advertising partners). While we do not control or have access to the advertiser cookies we do permit them to be used on this Website to facilitate tailored advertising and monitor patterns of buying specific goods or interest in - for example, holidays or hobbies. These cookies run advertisements tailored to the user based on his online buying habits.
- **Pixels, Beacons:** We or third party ad servers, including Facebook, may use cookies or invisible pixels or beacons on this Website to count how many users visit certain pages or take certain actions to collect or receive information from this Website and elsewhere on the Internet. We may use this information to improve our marketing programs and content, and to target advertisements at this Website and/or on other sites.
- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases, joint marketing partners, data firms, social media platforms, from people with whom you are friends or otherwise connected on social media platforms, as well as from other third parties.
- **Mobile Devices:** When you use or access our Services from a mobile device, we may collect information such as your unique device ID and your location. If you download and use an App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the

App based on your device number, as well as any other Personal Information specified by the App in its terms or notices.

- **Do Not Track Signals:** At this time, we do not respond to browser ‘do not track’ signals, as we await the work of interested stakeholders and others to develop standards for how such signals should be interpreted. Third parties, including our service providers, may collect information about your online activities over time and across different websites, including when you visit our website. You can learn about how to exercise choice regarding the collection of information about your online activities over time and across third-party websites or online services by visiting [www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org).
- **Google Analytics:** We use Google Analytics to help us get a better understanding of how visitors use this Website and to facilitate interest based advertising associated with your Google Account and other devices you use. The information generated by the Google Analytics cookie about your use of this Website is transmitted to and stored by Google. If you do not want your activity on this Website to be tracked by Google Analytics, you may opt out by using this link: <http://tools.google.com/dlpage/gaoptout?hl=en>.
- **Internet Based Advertising:** We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use our Services and other websites, apps or online services, based on information relating to your access and use of our Services and other websites, apps and services on any of your devices, as well as information received from third parties. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags as described above). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Notice, please visit [www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org) to opt out in mobile apps. You may also opt out in Twitter by going to your account privacy settings and unchecking the box next to “Tailor ads based on information shared by ads partners.”
- **Other Non-Personal Information:** In addition to any Personal Information or other information you choose to provide to us on the Services, we and our third-party service providers may use a variety of technologies, now and hereafter devised, that automatically collect certain website usage information whenever you visit or interact with the Services. This information may include browser type, operating system, the page served, the time, the source of the request, the preceding page view, and other similar information. We may use this usage information for a variety of purposes, including to enhance or otherwise improve the Services. In addition, we may also collect your IP address or some other unique identifier for the particular device you use to access the Internet, as applicable (collectively, referred to herein as a “**Device Identifier**”). A Device Identifier is a number that is automatically assigned to your device, and we may identify your device by its Device Identifier. When analyzed, usage information helps us determine how our Services are used, such as what types

of visitors arrive at the Services, what type of content is most popular, what type of content you may find most relevant and what type of visitors are interested in particular kinds of content and advertising. We may associate your Device Identifier or website usage information with the Personal Information you provide, but we will treat the combined information as Personal Information.

We use non-personal information in a variety of ways, including to analyze site traffic, understand customer needs and trends, carry out targeted promotional activities and to improve our services. We may use your non-personal information by itself or aggregate it with information we have obtained from others. We may share your non-personal information with our affiliated companies and third parties to achieve these objectives and others, but remember that aggregate information is anonymous information that does not personally identify you. We may provide our analysis and certain non-personal information to third parties (who may in turn use this information to provide advertisements tailored to your interests), but this will not involve disclosing any of your personally identifiable information.

As aggregated or anonymized information does not constitute Personal Information, we may use it for any purpose. If we combine anonymized or aggregated data with Personal Information, we will treat the combined information as Personal Information according to this Privacy Notice.

## Why and How We Use Your Information

**We may Process Personal Information in connection with any of the following:**

**1. Our business transactions with you, including, but not limited to:**

- Entering into or performing a contract with you.
- Responding to your inquiries and fulfilling your requests.
- Sending administrative information to you, for example, information regarding the Services or an event you are attending.
- Completing and fulfilling any purchases or requests for services.

**2. For our legitimate business interests, including, but not limited to:**

- Personalizing your experience on the Services by presenting products and offers tailored to you.
- Allowing you to participate in sweepstakes, contests, and similar promotions, and administering such activities (each of which may have additional rules and could contain additional information about how we Process your Personal Information).
- Facilitating social sharing functionalities of your social media account(s).
- Carrying out data analysis, audits, fraud monitoring and prevention, internal quality assurance, developing new products, enhancing, improving or modifying our Services, identifying usage trends, auditing use and functionality of our Services, helping enforce compliance with our Terms of Use, helping protect our Services, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- Subject to your marketing preferences (which may include consent to marketing under applicable law), to send you newsletters or marketing communications we believe may interest you, for our

own products and services, and on behalf of our Affiliates or selected third parties, via postal mail, email, phone or text messaging.

3. **In accordance with any consent you may have provided.** You have the right to decline to provide your consent and, if consent is provided, to withdraw it at any time.
4. **As necessary or appropriate for legal reasons, including, but not limited to:**
  - Under applicable law.
  - Complying with legal process.
  - Responding to requests from public and government authorities, including those outside your country of residence.
  - Enforcing our terms and conditions.
  - Protecting our operations or those of any of our Affiliates, RCI affiliated resorts or other third parties.
  - Protecting our rights, privacy, safety or property, or that of our Affiliates, RCI affiliated resorts, you, or other third parties.
  - Allowing us to pursue available remedies or limit damages we, our Affiliates, RCI affiliated resorts or other third parties, may sustain.

## When We Disclose Your Information

### We may disclose your information as follows:

- **Affiliates:** We may disclose your personal information to any other entity that is, at the time you disclose your Personal Information, directly or indirectly controlled by, or under common control with us (“**Affiliates**”) for the purposes described in this Privacy Notice, including under “**Why and How We Use Your Information**”, unless otherwise prohibited by applicable law. You can find more information about our primary operating Affiliates in our Annual Report as of the date the Annual Report was published or by contacting us at the contact information set forth below in the section titled “**How Can You Contact Us?**”.
- **Vendors and Service Providers:** We may disclose your personal information to vendors and service providers we retain in connection with our business such as: travel services companies, financial services companies, property owners’ associations, vacation insurance companies, website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, tax and financial advisers, legal advisers, accountants, auditing services or others.
- **Business Partners, Sponsors, and Other Third Parties:** We may disclose your Personal Information to business partners, co-sponsors of promotions, and other third parties in order to provide you with services that may interest you. For example, we may share your Personal Information with the owners and operators of affiliated and unaffiliated hotels and resorts, airlines, car rental services, retail stores, credit agencies and other third parties to facilitate reservations, to offer you products or services, or in connection with any loyalty program we may provide or a loyalty program of one of our partners. We

may also co-sponsor promotions, sweepstakes, or other events with a third party and may share your Personal Information in connection with these events. Further, we may share your Personal Information with third party providers located on-site at hotels or resorts, such as time-share, spa, golf, concierge, and dining providers. If you provide additional information to any of these third parties, such information will be subject to such third parties' privacy practices.

- **Resorts or Business Partners:** We may share Personal Information with RCI affiliated resort owners and operators in order to provide you with services, facilitate a booking you requested, generate leads in connection with their offers to sell timeshares to you, to facilitate their understanding of their owners' exchange history and utilization, or to respond to your inquiry for further information about mini-vacations at resorts where a resort tour is either required or requested of you by the resort owner or operator.
- **Message Boards:** We may make reviews, message boards, blogs, and other such user-generated content facilities available to users. Any information disclosed in these areas becomes public information and you should always be careful when deciding to disclose your Personal Information. We are not responsible for privacy practices of other users including website operators to whom you provide information.
- **Merger or Acquisition:** We may disclose your Personal Information to a third party who acquires any part of our business or the business of any of our Affiliates, whether such acquisition is by way of merger, consolidation, divestiture, spin-off, or purchase of all or a substantial portion of our assets.
- **Disclosure Permitted by Law:** We may disclose your Personal Information to law enforcement authorities, government or public agencies or officials, regulators, and/or to any other person or entity having appropriate legal authority or justification for receipt of your information, if required or permitted to do so by law or legal process, to respond to claims, or to protect our rights, interests, privacy, property or safety, and/or that of our Affiliates, you or other third parties.

## How Do We Safeguard Your Information?

We will take reasonable steps to protect the information you provide us from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have implemented appropriate physical, electronic and managerial procedures to help safeguard and secure your information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Unfortunately, no security system is 100% secure, thus we cannot ensure the security of all information you provide to us via the Services.

## Other Important Information

- **Information Provided on Someone Else's Behalf:** If you provide us with information about someone else, please ensure you have the person's permission to do so for the purposes detailed in this Privacy Notice.
- **Links to Websites:** The Services may have links to other websites that are not operated by us; we have no control over how these websites may collect your information and no liability for the practices,

policies and security measures implemented on these websites. You should read the privacy notices on those other websites before you submit your information through them.

- **Social Media Sites:** Please note that we are not responsible for the collection, usage and disclosure policies and practices (including data security) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.
- **Changes to Our Privacy Notice:** From time to time we may revise this Privacy Notice and/or use Personal Information for new, unanticipated uses not previously disclosed to meet changes in the regulatory or business environment, or to satisfy the needs of our customers and service providers. Updated and date stamped versions will be posted on the Services. Unless otherwise required under applicable law (e.g. obtaining consent from you for the relevant material changes) the revised Privacy Notice will take effect immediately upon such posting.
- **Minors:** We do not knowingly collect, maintain or use Personal Information from individuals under 18 years of age in connection with, and no part of our Websites, Social Media Pages, and Apps is directed to, individuals under the age of 18. If we do incidentally collect or maintain Personal Information from individuals under 18 years of age, you may request deletion of such information by contacting us as set forth under “**How Can You Contact Us?**” below.
- **International Transfers:** We are an international company and we may, subject to applicable law, transfer your information, to our Affiliates or selected third parties outside the country where you are located and where information protection standards may differ (e.g., your information may be stored on servers located in other jurisdictions). We will utilize appropriate safeguards governing the transfer and usage of your Personal Information, such as an adequacy decision by the European Commission, Model Clauses or other applicable adequacy mechanisms. If you would like further detail on the safeguards we have in place you can contact us directly as set forth in “**How Can You Contact Us?**” below.
- **Retention Period:** We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or permitted by law.

## Your Choices and Rights

- **Changes to Your Marketing Preferences:** You can opt-out from receiving future marketing communications from us at any time by:
  - Using the unsubscribe function in the email you receive from us; or
  - Contacting us as set forth under “**How Can You Contact Us?**” below.
- **Withdrawing Your Consent:** You may withdraw any consent you have provided to us to Process your information at any time.

- **Accessing your Information:** In accordance with applicable law, you may access the Personal Information we Process about you.

Any request to access or obtain copies of your Personal Information must be made in writing by contacting us as set forth under “**How Can You Contact Us?**” below. We may, depending on the applicable law in your country, be entitled to charge a nominal fee to cover some of our administration costs in connection with the provision of such information. We may also ask you to verify your identity and to provide further details relating to your request.

- **Correcting your Information:** We will take reasonable steps to ensure the accuracy of the Personal Information we retain about you. It is your responsibility to ensure you submit true, accurate, and complete information to us, and timely update us in the event this information changes. You may request that any inaccurate or incomplete Personal Information held by us or on our behalf is corrected, by contacting us as set forth under “**How Can You Contact Us?**” below.
- **Deleting your Information:** Under certain circumstances, you may request we delete Personal Information we hold about you by contacting us as set forth under “**How Can You Contact Us?**” below. We will assess your request and determine, under applicable law, whether we are required to delete this information.
- **Objecting to Processing:** If you would like us to stop Processing your Personal Information, you can request this by contacting us as set forth under “**How Can You Contact Us?**” below. We will assess your request and determine, under applicable law, whether we have any justification for the continued Processing.
- **Transferring your Information:** Under certain circumstances, you may receive your Personal Information in a format that allows you to send it to another company or to direct us to transfer it directly to another company.

## **Notice to California Residents: Your California Privacy Rights**

If you are a resident of California, California Civil Code Section 1798.83 allows you to request information regarding the Personal Information we collected and third parties to whom we disclosed your Personal Information for the third parties’ direct marketing purposes during the preceding calendar year. To make such a request, please send an email to our Privacy Officer at [feedback@rci.com](mailto:feedback@rci.com) or send a letter to:

RCI, LLC  
9998 North Michigan Road  
Carmel, IN 46032  
Attn: Legal Privacy

## **How Can You Contact Us?**

If after reviewing this Privacy Notice, you have any questions, complaints or privacy concerns, or would like to make any requests in relation to your Personal Information, or obtain further information on safeguards used for international transfers please send an email to our Privacy Officer at [feedback@rci.com](mailto:feedback@rci.com) or send a letter to:



RCI, LLC  
9998 North Michigan Road  
Carmel, IN 46032  
Attn: Legal Privacy

If you have a complaint or concern about how we Process your Personal Information, we will work to address such concern(s). You may also direct your complaint/concern to the applicable data protection authority.