

# Privacy Policy Effective Date: 10/01/2022

## Overview and Agreement

This Privacy Policy (“Privacy Policy”) applies to all “Personal Information” (as defined below) provided by you via use of this website and/or the online services provided via the Site (the “Services”) and constitutes an agreement between you and Seward Vacation Stays, LLC (Company,” “we” or “us”). Online privacy concerns focus on the protection of “Personal Information” from unauthorized use. As the term suggests, “Personal Information” is information which can be associated with a specific individual or entity, including, for example, a user’s name, address, or telephone number, e-mail address, photograph, driver’s license information, social security number, bank or other account information any other identifier that permits the physical or online contacting of a specific individual, and information about a user that is collected and maintained in personally identifiable form in combination with other Personal Information. Company has adopted consistent data protection and data security standards for processing the Personal Information of its clients, partners, prospects, and employees. Company holds responsibilities for protecting the privacy of Personal Information, including any personal information being maintained, against threats posed by unauthorized access or misuse. In addition, Company respects individual privacy and shall handle all Personal Information with care. This policy supports Company’s ability to adapt to a changing marketplace and forms the basis for long-lasting relationships built on trust. This statement also sets important basic conditions for the exchange of data, and a reasonable level of data protection for data flows. This policy applies to Company as well as associated companies and their employees and covers the following: collection, storage and use of Personal Information relating to clients, partners, Company employees, and prospects. This includes data relating to customers, prospects, suppliers, and other third parties. You consent and agree to the collection, storage and use of Personal Information provided by you in accordance with the terms of this Privacy Policy. Company reserves the right to change the Privacy Policy by publishing new terms on the Site at least thirty (30) days before the effective date of the changes, and your access and use of the Company website or online services thereafter constitutes your acknowledgment and acceptance of same.

## Personal Information We Collect

The data we collect depends on the context of your interactions with Company, the choices you make, and the products and features you use. The data we collect may include the following:

**User-Reported Information:** Company collects Personal Information of its clients, prospects and third-party service providers to facilitate customer support, sales, marketing and related operations essential to Company. Company collects information you provide to us such as contact information including name, email address, phone number, and similar data, the content of messages you send to us, such as feedback and product reviews you write, or questions and information you provide for customer support. When you contact us, such as for

customer support, phone conversations or chat sessions with our representatives may be monitored and recorded.

Applications: Using Company's applications, information can be processed on an organization's own computers or on computers hosted by Company. In the latter case, Company is an Application Service Provider (ASP). The sign-up process for creating an account for certain applications requires you to provide us with personal contact information. We may also collect certain financial information to create and maintain your account (including without limitation, rent payment amounts and bank account and credit card information).

The types of Personal Information collected at these application pages may include:

- Name
- Address (e.g. for billing and shipping)
- Email address
- Phone number
- Payment card/account information
- Property address
- Other information which is required to complete your request or transaction using the Services or otherwise fulfill your request, which may include personal identification information such as social security number, driver's license number and similar information.
- Other information as agreed upon through separate Terms of Use/Terms and Conditions specified to the application, where applicable.

System Information/Cookies: Cookies are small bits of code, usually located on a user's computer hard drive or device, which store information about your visit, your preferences and settings, enable sign-in, provide interest based advertising, combat fraud and analyze how our websites and online services are performing.

We may use cookies and other means to collect Personal Information about your online activities over time and across different websites when you use the Site or the Services. We may automatically collect and store:

- information about devices you use to access the Services and how you use the Services, such as your Internet Protocol ("IP") address and which websites you visited before accessing our Services.
- certain information such as pages viewed, the date, time and length of time spent on the Site, computer and connection information such as browser type and version, operating system and platform, and other transactions performed on the Site.
- If you access the Site through a mobile device, we may also be able to identify the device ID and location of your mobile device. You may choose not to share your location details with us by adjusting your mobile device's location services settings.

For instructions on changing the relevant settings, please contact your service provider or device manufacturer.

## How We Use Personal Information

As a policy, Company uses Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual.

You agree that we can use your Personal Information as described in this Privacy Policy, to: (a) Enable, support and customize your use of the Site and/or our products, applications or services; (b) provide you with updates and information about our products and services; (c) conduct analysis for our business purposes; support development and marketing of our products and services including but not limited to the development and commercialization of new products and services; and (d) create de-identified information and then use and disclose this information in any way permitted by law, including to third parties in connection with their commercial and marketing efforts.

Google Analytics: The site uses Google Analytics to collect some of the data described above. You may read how Google uses data when you use our site here: <https://www.google.com/policies/privacy/partners/>. First Party Cookies: We use cookies to improve your web-browsing experience. For example, we may use a cookie to reduce the time it takes for you to submit requests by storing a registered user's e-mail address so that the user does not need to enter their e-mail address each time that they log-in to the Site. We will also use a cookie to keep track of your search criteria while you are using the Services. Our cookies are associated with a user's Personal Information. However, no third party may use the information we collect through our cookies for their own purposes. We use cookie and system information in the aggregate only to diagnose problems with our service, to improve and track the success and to provide content of interest to you. If you'd rather that Company not use cookies when you visit our website or use our online services, you can configure your browser settings to reject cookies, but doing so may cause some of the Services on the Site to not work properly.

Do Not Track Signals: Company's website and online services are not currently configured to respond to Do Not Track signals or other mechanisms that provide users the ability to exercise choice regarding the collection of Personal Information about a user's online activities over time and across third party websites or online services.

Use by Children: Company, as a standard practice, does not knowingly or specifically collect, use, or require any information about minors under the age of 18. The website(s) run by Company are not intended for minors under the age of 18. If you believe that we have mistakenly or unintentionally collected such information, please notify us so that we may delete the information from our servers.

Business Partners and Affiliates: We may share your personal information with non-affiliated third-parties as necessary for us to provide the product or service you, as permitted by law, or as otherwise specified herein. We may also provide all of the types of Personal Information

listed above to one or more of our affiliated companies in connection with our services and other business purposes.

**Sharing of Information:** You agree that we may disclose your Personal Information to third party contractors that assist us by performing services related to operation of the Site and/or the Services. If it is necessary to disclose your Personal Information to third parties, Company will obtain assurances from the recipients that they will safeguard Personal Information consistently with this Privacy Policy. Examples of appropriate assurances that may be provided by recipients include but are not limited to: a contract obligating the recipient to provide at least the same level of protection as is required hereunder and/or under applicable legal and industry requirements such as PCI DSS. Where Company becomes aware that a recipient is using or disclosing Personal Information in a manner contrary to this Privacy Policy, Company will take reasonable steps to prevent or stop the use or disclosure. We may also provide the types of Personal Information listed above to one or more of our affiliated companies in connection with our services and other business purposes.

**Law Enforcement/Legal Disclosure:** Additionally, notwithstanding any other provision contained herein, to the extent permitted or required by law, regulation or other legal requirement, we will disclose your Personal Information to government authorities or third parties if: (a) required to do so by law, or in response to a subpoena or court order; (b) we believe in our sole discretion that disclosure is reasonably necessary to protect against fraud, to protect the property or other rights of us or other users, third parties or the public at large; or (c) we believe that you have abused the Site by using it to attack other systems or to gain unauthorized access to any other system, to engage in spamming or otherwise to violate applicable laws or in violation of our Site Terms of Use. You should be aware that, following disclosure to any third party, your information may be accessible by others to the extent permitted or required by applicable law.

**Cookies/System Information:** We may share the foregoing information with advertisers or other third parties, including our business partners, suppliers and vendors, on an aggregated basis without revealing any Personal Information.

### Non-U.S. Users

The Site and the Services are directed to users located in the United States. If you are located outside of the United States and you choose to use the Site or the Services or provide your Personal Information to us, your Personal Information may be transferred to, processed and maintained on servers or databases located in the United States. Your use of the Site and/or the Services represents your consent and agreement to these practices. If you do not want your Personal Information transferred to or processed or maintained in the United States, you should not use the Site or the Services. In the case that Personal Information is transmitted to Company by you, you must ensure that the Personal Information has been collected in accordance with the applicable legal requirements, and that the use of such Personal Information for the intended use is permitted. Notice Company informs individuals about the

type(s) of Personal Information it collects, the purposes for which it collects and uses Personal Information, and the types of non-agent third parties to which Company discloses or may disclose information, and the choices and means, if any, Company offers individuals for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language before individuals are first asked to provide Personal Information to Company, or as soon as practicable thereafter, and in any event before Company uses or discloses the information for a purpose other than that for which it was originally collected.

### Information Security and Confidentiality

We have implemented technology and security features, methods and processes in an effort to safeguard the privacy of your Personal Information from unauthorized access or improper use, and we will seek to continue to enhance its security procedures as new technology becomes available. All Personal Information is treated confidential; any unauthorized collection, processing, or use of such Personal Information is prohibited. In the context of increasingly flexible company organization, it must be ensured that employees have access to Personal Information on a need-to-know basis. The need-to-know principle means that employees may have access to Personal Information only as is appropriate for the type and scope of the task in question. This requires a careful breakdown and separation, as well as implementation, of roles and responsibilities. Nevertheless, you acknowledge and agree that perfect security is not possible, and your Personal Information could still be accessed and used by others without authorization. Personal Information that is no longer needed for its intended purpose will be deleted in compliance with the Company's existing data retention policy.

### Other Websites

This Privacy Policy only applies to the Site and Company's Services and your Personal Information submitted to the Site or via the Services. The Site may link to third party websites and information or service providers that may collect Personal Information from you in order to provide you with information or fulfill Product orders placed by you. Advertisements that may appear on pages on the Services may also request Personal Information or provide you with access to other sites that request Personal Information. We have no control over the Privacy Policy of any third party or other website. Their privacy policies may differ, or they may have no privacy policies. Please examine the privacy policies of such third parties prior to submitting any Personal Information, as they may differ from ours.

### Business Transfers

We may share the information we collect, including personal information, with any third party in connection with, or during negotiations of, any proposed or actual merger, purchase, sale (including a liquidation, realization, foreclosure or repossession) or any other type of acquisition of all or any portion of Company assets, conveyance or transfer of all or a portion of our business to another company. In the unlikely event of Company's bankruptcy, insolvency, reorganization, receivership, or assignment for the benefit of creditors, or the application of

laws or equitable principles affecting creditors' rights generally, Company may not be able to control how your Personal Information is treated, transferred, or used.

#### Dispute Resolution

Company will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of Personal Information in accordance with the principles contained in this statement. Individuals with inquiries or complaints regarding their personal information should first contact us at [reservations@sewardvacationstays.com](mailto:reservations@sewardvacationstays.com).