# Vertical Escape Vacations, LLC - Privacy Policy

Your privacy is important to Vertical Escape Vacations, LLC (formerly, Vertical Escape Ski Tours, LLC and hereinafter may be referred to as, "Vertical Escape Ski Tours," "VEST," "VEV," "we," "Vertical Escape Vacations" or "Vertical Escape"). Our Privacy Policy explains how we collect, use, disclose, transfer and store your information. Please familiarize yourself with our privacy practices and contact us if you have any questions.

## **Collection and Use of Personal Information**

Personal information is data that can be used to uniquely identify or contact a single person. You may be asked to provide your personal information anytime you are in contact with Vertical Escape Vacations or affiliate. Vertical Escape Vacations and its affiliates may share this personal information with each other and use it consistent with this Privacy Policy. Vertical Escape Vacations may also combine personal information with other information to provide and improve our services, content and advertising.

# What Personal Information We May Collect

When you submit your application to Vertical Escape Vacations, sign up for a Vertical Escape Vacations trip, order merchandise or participate in any online survey, Vertical Escape Vacations may collect a variety of information, including your name, email address, mailing address, phone number, contact preferences and/or credit card information.

# How We Use Your Personal Information

The personal information that Vertical Escape Vacations collects will enable us to keep you posted on Vertical Escape Vacations' latest announcements and updates. The personal information also enables Vertical Escape Vacations to improve our services, content and advertising. If you don't want to be on Vertical Escape Vacations' mailing list, you can opt-out anytime by updating your preferences or send us an email, requesting to be removed. Vertical Escape Vacations may also use personal information to help us develop, deliver and improve our services, content and advertising. Periodically, Vertical Escape Vacations may use your personal information to send important notices, such as communications about membership and revisions to our terms, conditions and policies. Since this information is important to your interaction with Vertical Escape Vacations, you may not opt-out of receiving these communications, unless you rescind your membership. Vertical Escape Vacations may also use personal information for internal purposes such as auditing, data analysis and research to improve our services and member communications.

## **Collection and Use of Non-Personal Information**

Vertical Escape Vacations also collects non-personal information. Non-personal information is data in a form that does not permit direct association with any specific individual. Vertical Escape Vacations may collect, use, transfer and disclose non-personal information for any purpose. The following are some examples of non-personal information that Vertical Escape Vacations collects and how we may use it:

Vertical Escape Vacations may collect information such as zip code, area code, unique device identifier, location and the time zone where a Vertical Escape Vacations service is used in order to better understand customer behavior and to improve our services and advertising. Vertical Escape Vacations may also collect information regarding customer activities on our site. This information is aggregated and used to help Vertical Escape Vacations provide more useful information to our customers and to understand which sections of our site and services are of most interest and utility. Aggregated data is considered non-personal information for the purposes of Vertical Escape Vacations' Privacy Policy. If Vertical Escape Vacations does combine non-personal information with personal information, then the combined information will be treated as personal information for as long as the information remains combined.

## **Cookies and Other Technologies**

Vertical Escape Vacations' website, online services, interactive applications, email messages and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help Vertical Escape Vacations better understand user behavior, tell us which parts of our site people have visited and facilitate and measure the effectiveness of advertisements and web searches. Vertical Escape Vacations treats information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, Vertical Escape Vacations also treats these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, Vertical Escape Vacations and our partners also use cookies and other technologies to remember personal information when you use our site, online services and/or applications. Vertical Escape Vacations were vacations more convenient and personal. For example, knowing your first name lets us welcome you the next time you visit the Vertical Escape Vacations site. If you want to disable cookies. For other browsers, check with your provider

to find out how to disable cookies. Please note that certain features of the Vertical Escape Vacations site may not be available once cookies are disabled. As is true of most websites, Vertical Escape Vacations gathers some information automatically and stores the information in its log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit pages, operating system, date/time stamp and clickstream data. Vertical Escape Vacations uses this non-personal information to understand and analyze trends, to administer the Vertical Escape Vacations site, to learn about user behavior on the Vertical Escape Vacations site, and to gather demographic information about our user base as a whole. Vertical Escape Vacations may use this non-personal information in our marketing and advertising services. Pixel tags enable Vertical Escape Vacations to send email messages in a format that customers can read, and they tell us whether or not email has been opened. Vertical Escape Vacations may use this information to reduce or eliminate messages sent to its customers.

## **Disclosure to Third-Parties**

Vertical Escape Vacations may make certain personal information available to strategic partners who work with Vertical Escape Vacations to provide products and services, or that help Vertical Escape Vacations market to its customers. Personal information will only be shared by Vertical Escape Vacations to provide or improve our services and advertising; personal information will not be shared with third-parties for their marketing purposes.

# Service Providers

Vertical Escape Vacations may share personal information with companies who provide services such as information processing, extending credit, fulfilling subscription orders, delivering services to you, managing and enhancing customer data, providing customer service, assessing your interest in Vertical Escape Vacations' services, and conducting customer research or satisfaction surveys. These service providers are obligated to protect your information and may be located wherever Vertical Escape Vacations operates.

#### **Others**

It may be necessary - by law, legal process, litigation and/or requests from public and governmental authorities within or outside your country of residence - for Vertical Escape Vacations to disclose your personal information. Vertical Escape Vacations may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate. Vertical Escape Vacations may also disclose information about you if we determine that disclosure is reasonably necessary to enforce our Terms & Conditions of Use or to protect our operations or users. Furthermore, in the event of a reorganization, merger or sale Vertical Escape Vacations may transfer any and all personal information we collect to the relevant third-party.

## **Protection of Personal Information**

Vertical Escape Vacations takes security precautions - including administrative, technical, and physical measures - to safeguard your personal information against loss, theft and misuse, as well as against unauthorized access, disclosure, alteration and destruction. Vertical Escape Vacations' online services use Secure Sockets Layer (SSL) encryption on all web pages where personal information is collected. To submit applications, book trips, or otherwise use Vertical Escape Vacations' services, you must use an SSL-enabled browser such as Chrome, Internet Explorer, Mozilla Firefox or Safari. Doing so protects the confidentiality of your personal information while the information is transmitted via the Internet. When you use some of Vertical Escape Vacations' services or applications, or post on a Vertical Escape Vacations forum, chat room, or social networking service, the personal information you share is visible to other users and can be read, collected or used by them. You are responsible for the personal information you choose to share in the aforementioned instances.

#### Integrity and Retention of Personal Information

Vertical Escape Vacations makes it convenient for you to keep your personal information accurate, complete and up-to-date. Vertical Escape Vacations will retain your personal information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

#### Access to Personal Information

Please ensure that your contact information and preferences are accurate, complete and up-to-date. For other personal information, Vertical Escape Vacations makes good faith efforts to provide you with access so you can request that Vertical Escape Vacations correct the data, if the data is inaccurate or delete the data if Vertical Escape Vacations is not required to retain the data by law or for legitimate business purposes. Vertical Escape Vacations may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are impractical, or for which access is not otherwise required by local law. Access, correction, or deletion requests can be made to: info@VEVacations.com

#### **Children's Online Privacy Protection**

In accordance with the Children's Online Privacy Protection Act of 1998, Vertical Escape Vacations will not knowingly store personal information from a child under the age of thirteen (13). If Vertical Escape Vacations

learns that we have stored personal information from a child under the age of thirteen (13), we will take the necessary steps to delete the information as soon as possible. Obtaining certain information is required for membership, as it may affect pricing.

# **Location-Based Services**

To provide location-based services, Vertical Escape Vacations, our affiliates and our licensees may collect, use and share precise location data, including the real-time geographic location of your computer or mobile device. This location data is collected anonymously in a form that does not personally identify you and may be used by Vertical Escape Vacations, our affiliates and our licensees to provide and improve location-based services.

#### **Third-Party Sites and Services**

Vertical Escape Vacations' website, applications and services may contain links to third-party websites, products and services. Vertical Escape Vacations' services may also use or offer products or services from third-parties. Information collected by third-parties, which may include location data or contact details, is governed by each third-party's respective privacy practices. Vertical Escape Vacations encourages you to read the privacy practices of those third-parties.

## **International Users**

Information you provide may be transferred or accessed by entities throughout the world as described in this Privacy Policy. Vertical Escape Vacations abides by the "safe harbor" framework set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information collected by organizations in the European Economic Area and Switzerland.

#### Our Companywide Commitment to Your Privacy

To ensure your personal information is secure, Vertical Escape Vacations communicates its privacy and security guidelines to all Vertical Escape Vacations employees and strictly enforces privacy safeguards within the company.

# **Privacy Questions**

If you have questions or concerns about Vertical Escape Vacations' Privacy Policy or data processing, please contact us at: <u>info@VEVacations.com</u>

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