

SMARTLEISURE PRIVACY POLICY

SmartLeisure respects the privacy of its users and has developed this Privacy Policy to demonstrate its commitment to protecting your privacy. This Privacy Policy describes the information we collect, how that information may be used, with whom it may be shared, and your choices about such uses and disclosures. We encourage you to read this Privacy Policy. By using our website, you are accepting the practices described in this Privacy Policy.

By using our website, we may collect information that can identify you such as your name and email address ("personal information"). We may collect this information through our website or our mobile application. When you provide personal information through our website, the information may be sent to servers located in the United States.

- **With respect to information you provide**, we may collect and store any personal information you enter on our website or provide to us in any other manner; this includes identifying information, such as your name, address, email address, and telephone number. We may request information about your interests and activities, your gender and age, and other demographic information such as your hometown or your username, as well as your driver's license information; such information will be voluntarily provided and shared only in accordance with this Privacy Policy.
- **With respect to information about others**, we may collect and store personal information about other people that you provide to us, such as their name, address and email address; such information will be voluntarily provided and shared only in accordance with this Privacy Policy.

We use various technologies to collect information from your device and about your activities on our site or application.

- **With respect to information collected automatically**, we automatically collect information from your browser or device when you visit our website or application; this information could include your IP address, device ID, your browser type and language, access times, the content of any undeleted cookies that your browser previously accepted from us, and the referring website address.
- **With respect to cookies and our use of cookie data**, when you visit our website or mobile application, we may assign your device one or more cookies to facilitate access to our site and to personalize your online experience. Through the use of a cookie, we may automatically collect information about your online activity on our site, such as the web pages you visit, the time and date of your visits, the links you click, and the searches you conduct on our site. During your visits to other websites where we advertise, we (or third parties) may use certain data collected on our site to show you the type of SmartLeisure advertisements likely to be of greater interest to you. Although you may not opt out of receiving online advertisements generally, you may control the collection of data on our site used for targeted SmartLeisure advertising during your visits to other websites. Most browsers automatically accept cookies, but you can usually modify your browser setting

to decline cookies. If you choose to decline cookies, please note that you may not be able to sign in or use some of the interactive features offered on our website.

- **With respect to other technologies**, we may use standard Internet technology, such as web beacons and other similar technologies, to track your use of our site. We may include web beacons in advertisements or email messages to determine whether messages have been opened and acted upon. The information we obtain in this manner enables us to customize the services we offer our website visitors to deliver targeted advertisements and to measure the overall effectiveness of our online advertising, content, programming or other activities.
- **With respect to information collected by third-parties**, we may allow service providers, advertising companies and ad networks, and other third parties to display advertisements on our site. These companies may use tracking technologies, such as cookies, to collect information about users who view or interact with their advertisements. *Our website does not provide any personal information to these third parties.* This information allows them to deliver targeted advertisements and gauge their effectiveness. Some of these third-party advertising companies may be advertising networks that are members of the Network Advertising Initiative, which offers a single location to opt out of ad targeting from member companies (www.networkadvertising.org).

We may use information that we collect about you to:

- deliver our products and services, and manage our business;
- manage your account and provide you with customer support services;
- perform research and analysis about your use of, or interest in, our products, services, or content, or products, services or content offered by others;
- communicate with you by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us or other third parties;
- develop and display content and advertising tailored to your interests on our site and other sites, including providing our advertisements to you when you visit other sites;
- perform ad tracking and website or mobile application analytics;
- verify your eligibility and deliver prizes in connection with contests and sweepstakes;
- enforce or exercise any rights in our Terms and Conditions (*See Terms and Conditions*);
- perform functions as otherwise described to you at the time of collection; and

In all circumstances, we may perform these functions directly or use a third party vendor to perform these functions on our behalf who will be obligated to use your personal information only to perform services for us. Also, if you access our website or mobile applications from a

third party social platform, such as Facebook®, we may share non-personal information with that platform to the extent permitted by your agreement with it and its privacy settings.

We do not share your personal information with others except as indicated below or when we inform you and give you an opportunity to opt out of having your personal information shared. We may share personal information with:

- **Service providers:** We may share information, including personal information, with third parties that perform certain services on our behalf. These services may include fulfilling orders, providing customer service and marketing assistance, performing business and sales analysis, ad tracking and analytics, member screenings, supporting our website functionality, and supporting contests, sweepstakes, surveys and other features offered through our site. We may also share your name and contact information with our service providers for the purpose of effectuating our services, to the extent necessary. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purposes.
- **Business partners:** When you register or make purchases on our website or click-through our advertisements offered on third party websites or applications, we may share personal information with the businesses with which we partner to offer you the applicable products, services or any advertisements. When you elect to engage in a particular merchant's offer or program, you authorize us to provide your email address and other information to that merchant. To opt-out of cookies that may be set by third party data or advertising partners, please go to <http://www.aboutads.info/choices/>.
- **Other Situations:** We also may disclose your information, including personal information in the following circumstances:
 - In response to a subpoena or similar investigative demand, a court order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.
 - When we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to comply with applicable law or cooperate with law enforcement; or to enforce our website terms and conditions or other agreements or policies.
 - In connection with a substantial corporate transaction, such as the sale of our business, a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

We may share non-personal information we collect under any of the above-referenced circumstances. We may also share it with third parties to develop and deliver targeted advertising

on our site and on websites or applications of third parties, and to analyze and report on advertising you see. We may combine non-personal information we collect with additional non-personal information collected from other sources. We also may share aggregated, non-personal information, or personal information in hashed, non-human readable form, with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis or other business purposes. For example, we may engage a data provider who may collect web log data from you (including IP address and information about your browser or operating system), or place or recognize a unique cookie on your browser to enable you to receive customized ads or content. The cookies may reflect de-identified demographic or other data linked to data you voluntarily have submitted to us (such as your email address), that we may share with a data provider solely in hashed, non-human readable form. To opt-out of cookies that may be set by third party data or advertising partners, please go to <http://www.aboutads.info/choices/>.

There may be a number of places on our website where you may click on a link to access other websites that do not operate under this Privacy Policy. For example, if you click on an advertisement on our website, you may be taken to a website that we do not control. These third-party websites may independently solicit and collect information, including personal information, from you and, in some instances, provide us with information about your activities on those websites. We recommend that you consult the privacy statements of all third-party websites you visit by clicking on the "privacy" link typically located at the bottom of the webpage you are visiting.

If you have an online account with us, you have the ability to review and update your personal information online by logging into your account and clicking on your account settings. If you have an online account with us, you also may close your account at any time by visiting the settings page for your account. After you close your account, you will not be able to sign in to our website or access any of your personal information. However, you can open a new, separate account at any time or re-activate your previous account by following instructions we will give you at the time you close your account. If you close your account, we may still retain certain information associated with your account for analytical purposes and recordkeeping integrity, as well as to prevent fraud, collect any fees owed, enforce our terms and conditions, take actions we deem necessary to protect the integrity of our website or our users, and/or take other actions otherwise permitted by law. In addition, if certain information has already been provided to third parties as described in this Privacy Policy, retention of that information will be subject to those third parties' policies

You can choose not to provide us with certain information, but that may result in you being unable to use certain features of our site because such information may be required in order for you to register as a member.

When you register on our site, you consent to receive email messages from us. You also will be given the opportunity, in any commercial email that we send to you, to opt out of receiving such messages in the future. It may take up to ten (10) days for us to process an opt-out request. We may send you transactional and relationship emails, such as service announcements, administrative notices, and surveys, without offering you the opportunity to opt out of receiving them. Please note that changing information in your account, or otherwise opting out of receipt

of promotional email communications, will only affect future activities or communications from us. If we have already provided your information to a third party (such as a service provider) before you have changed your preferences or updated your information, you may have to change your preferences directly with that third party.

Our applications may also deliver notifications to your phone or mobile device. You can disable these notifications in your device's settings in your account under settings.

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorized access and disclosure. We want you to feel confident using our website to transact business. However, no system can be completely secure. Therefore, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information, searches, or other communications will always remain secure. Users should also take care with how they handle and disclose their personal information and should avoid sending personal information through insecure email. Please refer to the Federal Trade Commission's website at <http://www.ftc.gov/bcp/menus/consumer/data.shtm> for information about how to protect yourself against identity theft.

We provide areas on our site where you can post information about yourself and communicate with others. Such postings are governed by our Terms of Use.

Although our website is a general audience site, we restrict the use of our service to individuals age 18 and above. We do not knowingly collect personal information from children under the age of 13.

If you are visiting our website from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. By using our services, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this privacy policy.

This Privacy Policy does not create rights enforceable by third parties or require disclosure of any personal information relating to users of the website

We will occasionally update this Privacy Policy. When we post changes to this Privacy Policy, we will revise the 'last updated' date at the top of this Privacy Policy. We recommend that you check our website from time to time to inform yourself of any changes in this Privacy Policy or any of our other policies.