Privacy Policy

Protecting your private information is our priority. This Statement of Privacy applies to all Users of this website ("Site") as well as all customers and potential customers of Independent Travel Advisor ("Advisor") and governs data collection, usage, and protection of information that User provides through interactions with this website and with Advisor. For the purposes of this Privacy Policy, unless otherwise noted, all references to Independent Travel Advisor is the individual or company identified on this site by name and contact information published in the header of this site. For purposes of this Policy, "User" means any person accessing the Site, using the services available through the Site, or contacting the Advisor via the website's contact form. By using the Site, User consents to the data practices described in this statement.

Collection of your Personally Identifiable Information (PII)

In order to better provide User with products and services offered, Advisor may collect personally identifiable information, such as User's first and last names, mailing addresses (including zip codes), e-mail addresses, telephone and facsimile numbers, and other personally identifiable information. The Advisor may gather additional personal or non-personal information in the future. Depending upon the particular Service, some of the information the Advisor asks User to provide is identified as mandatory and some as voluntary. If a User does not provide the mandatory information with respect to a particular Service, that User will not be able to use or access that Service. However, no personally identifiable information will be collected about a User until and unless a User provides such information in order to access a Service.

If User purchases Advisor's products and/or services, Advisor will need to collect billing and credit card information. This information is used to complete the purchase transaction.

Advisor may also collect anonymous demographic information, which is not unique to User, such as your age and gender.

Advisor will not collect any personal information about User unless User voluntarily provides it. However, User may be required to provide certain personal information when electing to use certain products or services. These may include: (a) registering for an account; (b) entering a sweepstakes or contest sponsored by Advisor or supplier partner; (c) signing up for special offers from selected third parties; (d) sending Advisor an email message; (e) submitting User credit card or other payment information when ordering and purchasing products and services. To wit, Advisor will use the information for, but not limited to, communicating with User in relation to services and/or products requested from Advisor. Also, Advisor may gather additional personal or non-personal information in the future.

Use of Personal Information

Advisor collects and uses personal information to operate and deliver the services requested by User.

Advisor may also use personally identifiable information to inform User of other products or services available from Advisor and its affiliates.

Sharing Information with Third Parties

Except as otherwise stated in this Privacy Policy, Advisor will not disclose, sell, trade, or lease a User's personally identifiable information to other parties.

Advisor will maintain certain PII as described below to service bookings, communicate with you, and to manage accounting related information.

Advisor may share data with trusted partners to help perform statistical analysis, send email or postal mail, provide customer support, or arrange for deliveries. Credit card transactions are handled by established third party banking, processing agents and distribution institutions. If a User uses a credit card to pay for Services, we will be required to share the User's personally identifiable information with such institutions in order to verify and authorize the User's credit card or other payment All such third parties are prohibited from using this personal information except to provide these services to User, and they are required to maintain the confidentiality of User information.

Advisor may disclose User's personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Advisor or the site; (b) protect and defend the rights or property of Advisor; and/or (c) act under exigent circumstances to protect the personal safety of users of the Site, or the public. Advisor fully cooperates with law enforcement agencies in identifying Users who use the Services for illegal activities. Advisor reserves the right to report to law enforcement agencies any activities that the Advisor, in good faith and in its sole discretion, believes to be unlawful.

<u>Travel Search Engine</u>. The travel search engine is powered by farebuzz.com. When using the travel search engine, your personal information is protected by and subject to farebuzz.com privacy policy and data protection protocols.

<u>Direct Marketing</u>. Advisor does not disclose User's personally identifiable information to third parties for direct marketing purposes.

Security and Protection of Information.

<u>Personally Identifiable Information (PII).</u> Advisor shall store personally identifiable information in accordance with current industry security standards in order to protect it from unauthorized access, use or disclosure. User access to his or her own personally identifiable information is available through unique customer ID and a password selected by User. Such information is stored on a secure server only accessible by Advisor. Personally identifiable information is encrypted using industry-recognized standards in order to prevent unauthorized parties from viewing such information that a User submits it to Advisor.

<u>Transmission of Personally Identifiable Information</u>. When personally identifiable information is transmitted to other parties, such as, government authorities, credit card providers, or any other authorized third parties, Advisor will use commercially reasonable efforts to prevent unauthorized parties from viewing such information.

<u>Access and User Changes to Information</u>. User may access and update User's information at any time by contacting Advisor. However, any changes to User's information will only be reflected going forward; Advisor cannot alter information it has already provided to third parties.

<u>Links</u>. Site contains links to other sites. Advisor is not responsible for the content or privacy practices of such other sites so Users must be aware when they leave the Site and to read the privacy statements of any other site that collects personally identifiable information.

<u>No Warranties</u>. No data transmission over the Internet or other wireless communication method can be guaranteed to be totally secure. As a result, while Advisor will make all reasonable efforts to protect the privacy of Users' information, both personally identifiable and otherwise, ADVISOR MAKES NO GUARANTEES, REPRESENTATIONS, OR WARRANTIES WITH RESPECT TO THE PRIVACY OF SUCH TRANSMITTED INFORMATION. Advisor's obligations with respect to the security of Users' stored information are set forth in the applicable contract. State laws may also apply to said obligations to secure stored information.

<u>Use of Cookies</u>. "Cookies" are used to ensure that Users can use the Site effectively. A cookie is a text file that is placed on a User's hard disk by a web page server. Cookies are uniquely assigned to Users and can only be read by a web server in the domain that issued the cookie. Each User has the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but with settings that can be modified to decline cookies. If a User chooses to decline cookies, the User may have difficulty using the Services or may be unable to use the Services at all.

<u>General Data Protection Regulation</u>. Services are not offered to residents of the European Union. While Advisor attempts to avoid doing business with residents of the European Union, we cannot prevent such activity in every case. Given this fact, residents of the European Union expressly assume responsibility for their actions on this website, any related website, or any third-party service. Further, residents of the European Union in using Advisor's services, indemnify Advisor with regard to E.U. law. We store any personally identifiable information of any visitor to the Advisor's sites and its partners as required by U.S. law and industry best practices.

Right to Deletion

Subject to certain exceptions set out above, on receipt of a verifiable request from User, Advisor will delete User personal information from our records and direct any service providers to delete User personal information from their records.

Changes to this Statement

Company reviews the privacy policy annually, at a minimum, and reserves the right to revise, amend, or modify this Policy at any time and in any manner. When we post changes to this Policy, we will update the "last updated" date at the bottom of this Policy and we encourage you to regularly check this Policy for changes.

California Law. The following provisions apply only to Users residing or domiciled in the State of California:

<u>Sale of Personally Identifiable Information.</u> Under Cal. Civ. Code § 1798.80, a User residing in the State of California has the right to request from Advisor a list of all third parties to which the Advisor has disclosed personally identifiable information during the preceding year for direct marketing purposes. As stated before, Advisor does not and will not disclose such information for direct marketing purposes. For questions about this policy, please contact us via the phone or email address indicated in the header of this Advisor's website.

<u>Do Not Track Signals</u>. In order to help us personalize your experience on our website, the Advisory does not act on Do Not Track signals from a User's Internet browser. Advisor's suppliers that collect personally identifiable information through the Services also do not act on

Do Not Track signals from a user's browser. Advisor makes no representations concerning a the Advisor 's website. These disclosures are made under Cal. Bus. & Prof. Code § 22575.

Indemnification

Advisor uses this website through its relationship with Atlas Travel Home. Advisor is solely responsible for this website's content, data, security, and compliance with all applicable law. Specifically, Advisor indemnifies Atlas Travel Home for any failures, breaches, or other problems arising from the use of this site or other services provided by Atlas Travel Home and its partners.

Children Under Thirteen

Advisor does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website.

E-mail Communications

From time to time, Advisor may contact User via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication.

To stop receiving marketing or promotional communications via email from Advisor, User may opt out of such communications by emailing or contacting Advisor.

Contact Information

Advisor welcomes your questions or comments regarding this Statement of Privacy. Refer to Advisor's contact information on Advisor's Site.

This Privacy Policy is effective as of March 19, 2021.