

ARCADIA LTD

PRIVACY POLICY

WHAT INFORMATION WE COLLECT FROM YOU

In General. We receive and store any information you enter on our website or give us in any other way. This includes information that can identify you ("personal information"), including your first and last name, telephone number, postal and email addresses, and billing information (such as credit card number, cardholder name, and expiration date). We may also request information about your hotel room preferences and frequent flyer and car rental program information. You can choose not to provide information to us, but in general some information about you is required in order for you to register as a member; book travel; complete a traveler profile; participate in a survey, contest, or sweepstakes; ask us a question; or initiate other transactions on our site.

Travel Companion Information. When you make a reservation for someone else through this website, we will request personal information and travel preferences about that individual. You should obtain the consent of other individuals prior to providing us with their personal information and travel preferences, as any access to view or change their information will be available only through your account.

Automatic Information. We automatically collect some information about your computer when you visit this website. For example, we will collect your IP address, Web browser software (such as Firefox, Safari, or Internet Explorer), and referring website. We also may collect information about your online activity, such as trips viewed and bookings made. Our goals in collecting this automatic information include helping customize your user experience and inhibiting fraud. For more information, please see our policy on **Cookies and other technologies below.**

How we use your information

We use sensitive billing information (such as cardholder name, credit card number, and expiration date) for the purpose of completing the travel bookings you conduct on our site. We use other information about you for the following general purposes: to provide you with the products and services you request; to provide you with travel confirmation and updates; to manage your account, including processing bills and providing travel notifications; to communicate with you in general; to respond to your questions and comments; to measure interest in and improve our products, services, and website; to notify you about special offers and products or services that may be of interest to you; to otherwise customize your experience with this website; to reward you as part of any reward and recognition program you choose to join; to solicit information from you, including through surveys; to resolve disputes, collect fees, or troubleshoot problems; to prevent potentially prohibited or illegal activities; to

enforce our Terms of Use; and as otherwise described to you at the point of collection.

Email Communications. We want to make it easy for you to take advantage of travel-related opportunities on our website. One way we do this is by sending you email messages that contain information about your apparent travel-related interests. For example, if you search for a flight to New York on our website and have saved your itinerary or otherwise not yet booked your travel, we may send you an email message reminding you about your saved travel itinerary or about a special airfare to New York. Similarly, if you receive an email from us about New York travel and demonstrate an interest in New York hotels by affirmatively clicking on a link about New York hotels in the email, you may receive an email about New York hotel offers or other destination information. We believe these email messages will provide you with useful information about travel-related special offers available through our site. Please note that you will have the opportunity to choose not to receive these email messages in any such email we send.

Please review "**Your choices with respect to the collection and use of your information**" below.

With whom we share your information

This website may share your information with the following entities:

- Suppliers, such as hotel, airline, car rental, and activity providers, who fulfill your travel reservations. Throughout this site, all services provided by a third-party supplier are described as such. By making a reservation through this site, you are authorizing us to disclose to suppliers the information required to complete the booking and deliver the related travel. These suppliers are not controlled by Arcadia Travel and personal information disclosed to them is subject to the applicable supplier's privacy policy and security practices. Therefore, we encourage you to review the privacy policies of any travel supplier whose products you purchase through this site.
- Third-party vendors who provide services or functions on our behalf, including credit card processing, business analytics, customer service, marketing, distribution of surveys or sweepstakes programs, and fraud prevention. We may also authorize third-party vendors to collect information on our behalf, including as necessary to operate features of our website or to facilitate the delivery of online advertising tailored to your interests. Third-party vendors have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose. They are also required to follow the same data security practices that we ourselves adhere to.
- Business partners with whom we may jointly offer products or services, or whose products or services may be offered on our website. You can tell when a third party is involved in a product or service you have requested because their name will appear, either alone or with ours. If you choose to access these optional services, we may share information about you, including your personal information, with those partners. Please note that we do not control the privacy practices of these third-party business partners.

- Companies within our corporate family. We may share your personal information with our parent company and corporate affiliates. This sharing enables us to provide you with information about products and services, both travel-related and other, which might interest you. To the extent that our parent company and corporate affiliates have access to your information, they will follow practices that are at least as restrictive as the practices described in this Privacy Policy. They also will comply with applicable laws governing the transmission of promotional communications and, at a minimum, give you an opportunity in any commercial email they send to choose not to receive such email messages in the future.

We also may share your information:

- In response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us.
- When we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of our company or this website, our customers, or others; and in connection with our Terms of Service and other agreements.
- In connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

Other than as set out above, you will be notified when personal information about you will be shared with third parties, and you will have an opportunity to choose not to have us share such information.

We also may share aggregate or anonymous information with third parties, including advertisers and investors. For example, we may tell our advertisers the number of visitors our website receives or the most popular hotels and vacation destinations. This information does not contain any personal information and is used to develop content and services we hope you will find of interest.

Your choices with respect to collection and use of your information

- As discussed above, you can choose not to provide us with any information, although it may be needed to book travel or to take advantage of certain features offered on this site.
- You will be given the opportunity to unsubscribe from commercial emails in any such message that we send you.
- You may have the opportunity on our website to provide a mobile number in order to receive day-of-travel flight alerts. You may discontinue these alerts at any time.

Cookies and other technologies

Cookies are small data text files and can be stored on your computer's hard drive (if your Web browser permits). This website uses cookies for the following general purposes:

To help us recognize your browser as a previous visitor and save and remember any preferences that may have been set while your browser was visiting our site. For example, if you register on our site, we may use cookies to remember your registration information, so you do not need to log into our site each time you visit.

- To help us customize the content and advertisements provided to you on this website and on other sites across the Internet. For example, when you access a page on our website, a cookie is automatically set by us, our service providers, or our partners to recognize your browser as you navigate on the Internet and to present you with information and advertising based on your apparent interests.
- To help measure and research the effectiveness of website features and offerings, advertisements, and email communications (by determining which emails you open and act upon).

Please note that if you refuse to accept cookies, you may not be able to access many of the travel tools offered on our sites.

In addition to the above cookies, we use Local Shared Objects, also referred to as "flash cookies," on our web site. These are used to enhance your user experience, for example, by storing your user preferences and settings, such as your volume/mute settings, and in connection with animated content on our website. Local Shared Objects are similar to browser cookies, but can store data more complex than simple text. By themselves, they cannot do anything to or with the data on your computer. Like other cookies, they can only access personally identifiable information that you have provided on this site, and cannot be accessed by other websites. To find out more about flash cookies or how to disable them, please visit: [Flash Player Help site](#).

This site may also use Web beacons (also known as clear gifs, pixel tags or Web bugs), which are tiny graphics with a unique identifier, similar in function to cookies, that are placed in the code of a Web page. We use Web beacons to monitor the traffic patterns of users from one page within our sites to another, to deliver or communicate with cookies, to understand whether you have come to our site from an online advertisement displayed on a third-party website, and to improve site performance. We also may allow our service providers to use Web beacons to help us understand which emails have been opened by recipients and to track the visitor traffic and actions on our site. This helps us measure the effectiveness of our content and other offerings.

Display of tailored advertising/Your choices

Data collected by this website to serve you with relevant advertising. Arcadia Travel.com is committed to providing you with relevant content and information. To do this, we may, through cookies and other technologies, collect information about your travel-related searches, such as whether you are looking for airline flights or hotels. We use this information, together with other information we have collected about you, to serve you with ads, on our website or elsewhere online, that match your apparent interests.

Please note that we do not combine the information we collect about your travel-related searches on this website with personal information (such as email address) to

serve you with ads across other websites. We also do not share your personal information with third parties so they can serve you with advertisements.

How we protect your information

We want you to feel confident about using this website to make travel arrangements, and we are committed to protecting the information we collect. While no website can guarantee security, we have implemented appropriate administrative, technical, and physical security procedures to help protect the personal information you provide to us. For example, only authorized employees are permitted to access personal information, and they may only do so for permitted business functions. In addition, we use encryption when transmitting your sensitive personal information between your system and ours, and we employ firewalls and intrusion detection systems to help prevent unauthorized persons from gaining access to your information.

Children's privacy

This is a general audience website and does not offer services directed to children. Should a child whom we know to be under 13 send personal information to us, we will use that information only to respond directly to that child to inform him or her that we must have parental consent before receiving his or her personal information.

Retention of your personal information

Where we collect personal information for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect data from accidental or malicious destruction, when we delete information from our records we may not immediately delete residual copies from our servers or remove information from our backup systems.

Access to your personal information

You have the right to request a copy of the personal data we hold about you. To do this, simply contact our Data Protection Officer (see below) and specify what information you would like. We will take all reasonable steps to confirm your identity before providing details of your personal information.

You will not have to pay a fee to access your personal information (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Correction of your personal information

You have the right to ask us to update, correct or delete your personal information. We will take all reasonable steps to confirm your identity before making changes to personal information we may hold about you. We would appreciate it if you would

take the necessary steps to keep your personal information accurate and up-to-date by notifying us of any changes we need to be aware of.

How to contact us

We have appointed a Data Protection Officer to oversee compliance with and questions in relation to this Notice. If you have any questions about this Notice, including any requests to exercise your legal rights, please contact our Data Protection Officer using the details set out below:

You have the right to complain to the Data Protection Commissioner (DPC) if you believe we have not handled your request in an appropriate manner. However, as a first step before complaining to the DPC, we would appreciate that you contact us so that we can remediate your concerns.

Changes to this Privacy Policy

We may update this Privacy Policy in the future. We will notify you about material changes to this Privacy Policy by sending a notice to the email address you provided to us or by placing a prominent notice on our website.