

ZOOMAWAY TRAVEL INC.

PRIVACY POLICY

This privacy policy (this “**Policy**”) describes the practices of ZoomAway Travel Inc. and its corporate affiliates (“ZoomAway, Inc.”, “**we**”, “**us**”, “**our**”) with respect to our collection, use, storage and disclosure of personal information provided to us from users of (a) the website operated at <http://zoomawaytravelinc.com> and such other locations as made available from time to time (the “**Website**”), (b) any “app” or other front-end software provided by us (for greater certainty, excluding third party software that may interact with the Website or the Service, as defined below) that interacts or interfaces with the Website (the “**Software**”), and (c) the services we provide through the Website and/or the Software (collectively, the “**Service**”). It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

Introduction and General Concepts

We respect and uphold individual rights to privacy and the protection of personal information. We know how important it is to protect your personal information and want to make every customer experience safe and secure. In keeping with that goal, we have developed this Policy to explain our practices for the collection, use, and disclosure of your personal information. We have appointed a Privacy Officer who is responsible for our compliance with this Policy. Information on how to contact the Privacy Officer can be found below.

(a) Personal Information

For the purposes of this Policy, “**personal information**” means information about an identifiable individual, including, for example, an individual’s name, home address, telephone number, social security number, sex, address, and billing information. Personal information does not include information that would enable an individual to be contacted at a place of business, for example an employee’s name, position or title, business telephone number, or business address. We will only collect, use or disclose personal information in accordance with this Policy, or in accordance with laws applicable to the collection, use and disclosure of your personal information by us (“**Applicable Privacy Laws**”).

(b) Non-Personal Information

“**Non-personal information**” is any type of information other than personal information, and is excluded from this Policy. For example, non-personal information would include business information, or information that enables an individual to be contacted at a place of business, for example an employee’s name, position or title, business telephone number, or business address. Non-personal information also includes information that is anonymous or not about an identifiable information, such as web browsing information (such as the domain used to access the Website, or the type and version of device, browser or operating system being used to access the Service), or aggregate information that anonymizes the underlying data (like the number of visitors, what pages users visit, average time spent on the Website or on various parts of the Service). We will collect, use or disclose non-personal information in accordance with our ordinary business practices, but always in accordance with any applicable laws. This Policy, however, only covers our collection, use and disclosure of personal information.

(c) Information about Minors

This site is intended solely for users at least 18 years of age (or the age of majority in your jurisdiction) or older]. We do not knowingly collect personal information about any person under the age of [majority including any person under the age of 13, and no such person, nor any parent or guardian as it relates to such person, should submit their personal information to us for any reason. Please do not submit personal information about minors to us, whether through the Website, the Service or otherwise.

(d) Privacy Officer

We have appointed a Privacy Officer who is responsible for our compliance with this Policy. Information on how to contact the Privacy Officer can be found below.

Collection and Use of Personal Information

As indicated above, we collect two types of information through our Service: personal information and non-personal information. The types of information we collect about you will depend on the nature of your interaction with us or the Service.

(e) Information we collect from you

We may collect the following personal information from you:

- contact information such as name, email address, mailing address, phone number
- billing information such as credit card number, and billing address
- unique identifiers such as user name, account number, password
- preferences information such as request history and marketing preferences
- user content generated by you, such as text and images as provided by you on the Website, which may contain personal information as provided by you
- any information that you voluntarily enter, including personal information, into any postings, comments, reviews, or forum
- other information as described in this Policy.

(f) Information we automatically collect

We may also automatically gather information about your computer such as your IP address, browser type, referring/exit pages, operating system, as well as which aspects of our performance metric indicators available with our technology or our licensees' products you prefer using. Some of this may be personal information, but in typical cases it is non-personal information. Specific examples follow:

- **IP, etc.**—When using our Website, we may collect the Internet Protocol (IP) address of your computer, the IP address of your Internet Service Provider, the date and time you access our Website, the Internet address of the website from which you linked directly to our Website, the operating system you are using, the sections of our Website you visit, the Website pages read and images viewed, and the content you download from the Website. This information is used for Website and system administration purposes, and to improve the Website.

- **Cookies**—We may use “cookies”, a technology that installs a small amount of information on a user’s computer to permit the Website to recognize future visits using that computer. Cookies enhance the convenience and use of the Website. For example, the information provided through cookies is used to recognize you as a previous user of the Website, to offer personalized content and information for your use, to track your activity at the Website, to respond to your needs, and to otherwise facilitate your Website experience. You may choose to decline cookies if your browser permits, but doing so may affect your use of the Website and your ability to access certain features of the Website or engage in transactions through the Website.
- **Tracking Information**—We may use web beacons or single-pixel gif tags to compile tracking information reports regarding Website user demographics, Website traffic patterns, Website purchases and other aggregated Website statistics, and may be used in our emails to determine which emails and links have been used by recipients. We may then provide these reports to advertisers and others. None of the tracking information in these reports can be connected to the identities or other personal information of individual users. For our own research purposes we may link tracking information with personal information voluntarily provided by Website users. Once such a link is made, all of the linked information is treated as personal information and will be used and disclosed only in accordance with this Policy.

2. **Use of Personal Information**

We may use your personal information, in combination with your non-personal information, for a variety of business purposes, for example to:

- fulfill your request or order
- send you a confirmation, if applicable
- send you requested information
- send new product or service information
- respond to customer service requests
- administer your Account, if and as account functionality becomes available
- send you a newsletter
- carry out contests or promotions
- send you marketing communications
- respond to your questions and concerns
- improve our Services and marketing efforts
- conduct research and analysis
- to enforce our Terms of Use
- display content based upon your interests

- for distribution to our payment processor for the provision of payment services
- facilitate your transactions with other users , as applicable
- for other purposes as described in this Policy.

3. Your Consent

We will collect, use, or disclose your personal information only with your knowledge and consent, except where required or permitted by Applicable Privacy Laws. When you choose to provide us with your personal information you consent to the use of your personal information as identified in this Policy and as may be further identified at the time of collection.

(a) Express Consent

Sometimes you may be asked to give your express consent to our collection, use or disclosure of personal information – for example, by being asked to check a box to indicate your consent to receive marketing communications.

(b) Implied Consent

Other times, you may provide your implied consent to our collection, use or disclosure of personal information when we can reasonably conclude that you have given consent by some action you have taken or an action you have decided not to take. Generally, this occurs where the purpose for the use of your personal information would be reasonably apparent to you – for example, when you provide us with your address through a form or email seeking information, you provide us with implied consent to use that address in order to respond to your request.

(c) Withdrawing Your Consent

You may notify us at any time that you wish to withdraw or change your consent to our use and disclosure or your personal information. We will accommodate your request subject to legal and contractual restrictions. The most common way of indicating this withdrawal of consent is (i) by changing your privacy preferences to the extent such functionality is made available through the Service, or (ii) deleting your account with the Service and stopping use of the Service. In other situations, you may be able to opt out of the use of your personal information. For example, if you have “opted in” or subscribed to one of our mailing lists, we will always provide you the opportunity to “opt out” or unsubscribe. For example, if you receive emails from us, we will provide a link in the email which you can use to unsubscribe from that mailing list, or you may contact us at ZoomAway Travel Inc.

You may also choose not to provide us with your personal information. However, if you make this choice we may not be able to provide you with the Service, or information that you have requested.

4. Information Obtained from Third Parties

If you provide us personal information about others, or if others give us your information, we will only use that information for the specific reason for which it was provided to us and in accordance with this Policy and such policy under which that information was collected.

5. Disclosure and Sharing of Your Information

We will share your personal information with third parties only in the ways that are described in this Policy. We will not sell your personal information to third parties, however the use of our Service necessarily requires some sharing or disclosure of your personal information. Some of these activities may result in personal information collected by us being stored or processed in the United States or elsewhere and, as a result, your personal information may be accessible to law enforcement and regulatory authorities in accordance with the USA PATRIOT Act, the USA FREEDOM Act and other applicable laws of the United States or elsewhere.

(a) Third Party Processors

We may provide your personal information to companies that provide services to help us with the Service such as web hosting providers, payment processors, product shipping providers, fulfilment agencies, or customer service agencies (“**Third Party Processors**”). These Third Party Processors are authorized to use your personal information only as necessary to provide these services to us, and in a manner consistent with this Policy. We have selected Third Party Processors who will only use your information in compliance with this Policy, but they may have their own specific policies regarding the collection, use and personal information. We will use commercially reasonable efforts to identify such Third Party Processors when we are collecting your personal information, as well as providing links to the relevant privacy policies that may apply.

(b) Further Disclosures

We may also disclose your personal information (i) as required by law such as to comply with a subpoena, or similar legal process, (ii) when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request, or (iii) to any other third party with your prior consent to do so.

(c) Third Party Links

Our Service may contain links to other websites or Internet resources which are provided solely for your convenience and information. When you click on one of those links you are contacting another website or Internet resource. We have no responsibility or liability for, or control over, those other websites or Internet resources or their collection, use and disclosure of your personal information. We encourage you to read the privacy policies of those other websites to learn how they collect and use your personal information.

6. Security of Personal Information

(a) General Security Practices

The security of your personal information is important to us. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. We employ physical, administrative, contractual and technological safeguards to protect personal information, and insist that our service providers do the same. We insist that our personnel, and those of our providers, only access and use personal information in order to properly perform those duties, and even then only to the strict extent necessary to perform them.

(b) Online Security

We follow generally accepted industry standards to protect personal information submitted to us, both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure, and so you should always exercise caution when disclosing sensitive information over the Internet.

If you have any questions about security on our Website, you can contact us at Sean@zoomaway.com

7. Requests for Access to and Correction of Personal Information

Applicable Privacy Laws allow, to varying degrees, individuals the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control. Our Privacy Officer will assist you with such an access request. This includes:

- identification of personal information under our custody or control;
- information about how personal information under our control may be or has been used by us; and
- the names of any individuals and organizations to which the individual's personal information has been disclosed.

We will respond to requests within the time allowed by Applicable Privacy Laws and will make every effort to respond as accurately and completely as possible. Any corrections made to personal information will be promptly sent to any organization it was disclosed to.

In certain exceptional circumstances, we may not be able to provide access to certain personal information it holds about an individual. If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

8. Removal of Your Information

We keep your information only as long as we need it for legitimate business purposes and to meet any legal requirements. Personal information used to make a decision that directly affects an individual will be kept for at least one year after such a decision. We have retention standards that meet these parameters. We destroy your information when it is no longer needed or required to be kept, or we remove your personally identifiable information to render it anonymous.

9. Updates or Changes to Privacy Policy

We may update this Policy to reflect changes to our information practices. If we make any material changes we will either (a) notify you by email (sent to the e-mail address specified in your account), or (b) provide a notice on the Website or otherwise through the Service prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. Any change to this Privacy Policy will become effective on the date so indicated, and will apply to information collected from the date of the posting of the revised privacy policy and to existing information held by us. The date on which the latest update was made is indicated at the bottom of this document. We recommend that you print a copy of this privacy policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Service signifies your acceptance of any changes to this Policy.

10. Contact Information

You can direct any questions or concerns regarding our compliance with this Policy to our Privacy Officer by emailing at Sean@zoomaway.com

If you are not satisfied with our Privacy Officer's response to their question or concern you may be able to make a complaint under Applicable Privacy Laws. Our Privacy Officer can provide you with the contact information to make such a complaint.

End of Privacy Policy January 2017