

AC Journeys' Privacy Policy

Effective Date: January 1, 2021

Anthropologie Consulting, LLC (AC Journeys) values your trust and wants you to be familiar with how we collect, use, and disclose information. This Privacy Policy describes our practices in connection with information that we collect when you visit any of our websites (including, but not limited to, www.acjourneys.com) (collectively, the “Websites”), access or use any of the software applications made available by us for use on mobile devices (the “Apps”), or purchase or use our services provided through our various channels, including, but not limited to, our Websites, Apps, email, and contact centers (the “Services”).

By visiting any of our Websites, accessing and/or using any of our Apps, or purchasing or using our Services, you are agreeing to the terms and conditions of this Privacy Policy and the accompanying Terms and Conditions.

PERSONAL INFORMATION

Personal Information We May Collect

“Personal Information” is information that identifies you as an individual or relates to an identifiable person, including, for example:

- Name
- Postal address(es)
- Telephone number
- Email address
- Credit and debit card number and related information
- Social media
- Passport number
- Number assigned by a transportation agency, such as a Transportation Security Administration known traveler number
- Any other information you provide when you communicate or book travel with us (e.g., your dietary and other preferences or needs), as well as information about your bookings (e.g., points of departure and destinations)

If you submit any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

How We May Collect Personal Information

We and our third-party service providers may collect Personal Information in a variety of ways, including:

- **Through the Services:** We may collect Personal Information through the Services, such as when you make a booking or register for a promotion.
- **Offline:** We may collect Personal Information from you offline, such as when you contact customer service.
- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected), and other third parties, to the extent permitted by applicable law.

We May Use Personal Information

We may use Personal Information:

- To complete and fulfill your booking or purchase, including to process your payment, communicate with you regarding your booking or purchase, and provide you with related customer service. We use passport information for the purpose of travel bookings.
- To respond to your inquiries and fulfill your requests, such as to send you newsletters.
- To send administrative information to you, such as information regarding the Services and changes to our terms, conditions, and policies.
- To send you marketing communications that we believe may be of interest to you, to the extent permitted by law.
- To personalize your experience on the Services by presenting products and offers tailored to you.
- To allow you to participate in sweepstakes, contests, and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how we use and disclose your Personal Information. We suggest that you read any such rules carefully, as you will be bound by them if you choose to participate.
- To facilitate social sharing functionality.
- To allow you to send messages to another person through the Services. By using this functionality, you are telling us that you are entitled to provide us with your friend's name and email address.
- For our business purposes, such as data analysis, audits, fraud monitoring and prevention, developing new products, enhancing, improving, or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns, and operating and expanding our business activities.
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your state or country of residence; (b) to comply with legal process and to prevent, detect, or suppress abuse, fraud, or criminal activity; (c) to respond to requests from public and government authorities and self-regulatory organizations, including public and government authorities and self-regulatory organizations outside your state or country of residence; (d) to enforce our terms and conditions; (e) to protect our operations, assets, or interests or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

How Personal Information May Be Disclosed

Your Personal Information may be disclosed or transferred to the following entities. With the exception of our corporate affiliates and service providers, these entities are not controlled by us and Personal Information disclosed to them is subject to the applicable entity's privacy policy and security practices. Therefore, we encourage you to review the privacy policies of any entity whose products or services you purchase using the Services:

- To our corporate affiliates, parent companies, subsidiaries, joint ventures, or other companies under common control with us worldwide for the purposes described in this Privacy Policy. AC Journeys is responsible for the management of the jointly used Personal Information.
- To our third-party travel-related suppliers, such as airlines, hotels, and car rental companies, so that they may provide the products and services that you book or purchase using the Services.
- To other travel-related companies with whom we partner to provide a portion of the Services, such as airline consolidators or aggregators, other travel agencies providing access to their travel-related inventory via the Services, and travel insurance providers.
- To our business partners, whose products or services may be offered on the Services, who referred you to the Services from another website or online service, or to whose website or online service the Services link. We encourage you to review the privacy policy of each such website or online service.
- To our third-party service providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision,

customer service, email delivery, auditing, and other services. The information we provide to third parties service providers is subject to confidentiality obligations and is intended to be used solely for the purpose(s) permitted thereby.

- To third-party sponsors or operators of surveys, sweepstakes, contests, and similar promotions.
- To identify you to anyone to whom you send messages through the Services. You may also choose to disclose your Personal Information on message boards, chat, profile pages, blogs, and other services to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public and may be available to other users and the general public. We urge you to be very careful when deciding to disclose any information on the Services.
- Subject to your social media account settings, to your friends associated with your social media account, to other website users, and to your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to your Services account or log into your Services account from your social media account. By connecting your Services account and your social media account, you authorize us to share information with your social media account provider, and you understand that the use of the information we share will be governed by the social media site's privacy policy. If you do not want your Personal Information shared with other users or with your social media account provider, please do not connect your social media account with your Services account, and do not participate in social sharing on the Services.
- In the event of a merger, reorganization, dissolution or similar corporate event, or the sale of all or substantially all of our assets, we expect that the information that we have collected, including personal data, would be transferred to the surviving entity in a merger or the acquiring entity. All such transfers shall be subject to our commitments with respect to the privacy and confidentiality of such personal data as set forth in our Privacy Policy.
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your state or country of residence; (b) to comply with legal process and to prevent, detect, or suppress abuse, fraud, or criminal activity; (c) to respond to requests from public and government authorities and self-regulatory organizations, including public and government authorities and self-regulatory organizations outside your state or country of residence; (d) to enforce our terms and conditions; (e) to protect our operations, assets, or interests or those of any of our affiliates; (f) to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

OTHER INFORMATION

Other Information We May Collect

“**Other Information**” is any information that does not directly reveal your specific identity or does not directly relate to an individual. If we are required to treat Other Information as Personal Information under applicable law, then we may use it only for the purposes for which we use and disclose Personal Information as detailed in this Privacy Policy. Other Information may, for example, be:

- Browser and device information
- App usage data
- Information collected through cookies, pixel tags, and other technologies
- Demographic information and other information provided by you
- Aggregated information

How We May Collect Other Information

We and our third-party service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.
- **Through your use of the App:** When you download and use the App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers, and what information and files have been downloaded to the App based on your device number.
- **Using cookies:** Cookies are pieces of information stored directly on the computer that you are using. Generally, cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other anonymous or pseudonymous traffic data. Please see our Cookie Policy below for more information.
- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Services to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Services and response rates.
- **Using Adobe Flash technology (including Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies:** We may use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the Website Storage Settings Panel. You can also control Flash LSOs by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to delete existing Flash LSOs (referred to as “information” on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including those used in connection with the Services.
- **IP Address:** Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider. An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems, and administering the Services. We may also derive your approximate location from your IP address.
- **Physical Location:** We may collect the physical location of your device by, for example, using satellite, cell phone tower, or WiFi signals. We may use your device’s physical location to provide you with personalized location-based services and content. We may also share your device’s physical location with our marketing partners, to enable them to provide you with geo-targeted advertising. You may be permitted to allow or deny such uses and/or sharing of your device’s location, such as through your device settings. If you do, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content.
- **From you:** Information such as your preferred means of communication and special travel requests (for example, in connection with a disability or dietary restriction) is collected when you voluntarily provide it.

- **By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the Services (for example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code).

How We May Use and Disclose Other Information

We may use and disclose Other Information for any purpose (except where we are required to do otherwise under applicable law), if it doesn't qualify as Personal Information under applicable law. In some instances, we may combine Other Information with Personal Information (such as combining your name with your location). If we do, we will treat the combined information as Personal Information as long as it is combined.

THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third-party supplier or intermediary, any third party operating any site or service to which the Services link or any third party that includes a widget on the Services (for example, the Facebook Like button or share buttons). The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider, or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps.

THIRD PARTY ADVERTISERS

We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites, apps or online services, based on information relating to your access to and use of the Services and other websites, apps or online services on any of your devices. To do so, these companies may place or recognize a unique cookie on your browser (including through use of pixel tags). They may also use these technologies and other information that they and we collect about your online use to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn about your choices in connection with it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/choices>. You may download the AppChoices app at www.aboutads.info/appchoices to opt out in mobile apps.

SECURITY

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contacting Us" section below.

Opt-Out of Marketing Emails

You may opt-out from receiving marketing-related emails from us on a going-forward basis by following the instructions contained in each such email or by contacting us in accordance with the "Contacting Us" section below. You may opt-out of receiving push notifications from us through your device settings.

We will try to comply with your request as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative or transactional messages, from which you cannot opt-out.

How you can access, change, or suppress your Personal Information

If you would like to review, correct, update, suppress, or delete Personal Information that you have previously provided to us, you may contact us in accordance with the “Contacting Us” section below. In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database, or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

RETENTION PERIOD

We 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.

USE OF THE SERVICES BY MINORS

The Services are not directed to individuals under the age of eighteen (18), and we request that they not provide Personal Information through the Services.

IMPORTANT NOTICE TO ALL NON-US RESIDENTS

Our servers are located in the U.S. If you are located outside of the U.S., please be aware that any information provided to us, including personal information, will be transferred from your country of origin. Except in the case of data transfers under the EU-U.S. Privacy Shield and the Swiss-US Privacy Shield Framework, your decision to provide such data to us, or allow us to collect such data through our Services constitutes your consent to this data transfer.

GDPR NOTICE

Natural persons located in the European Economic Area (“EEA”) should review the General Data Protection Regulation 2016/679 (“GDPR”) privacy notice <https://www.privacypolicies.com/blog/gdpr/>

In addition, the “**E.U.-U.S. and Swiss-U.S. Privacy Shield**” section within the GDPR privacy notice should be reviewed if your personal information is transferred from the EEA or Switzerland to the US pursuant to the E.U.-U.S. or Swiss-U.S. Privacy Shield.

YOUR CALIFORNIA PRIVACY RIGHTS

CCPA: If you are a resident of California, please review the California Consumer Privacy Act privacy notice [here](#).

“Shine the Light” Law: If you are a resident of California, you may request information regarding the disclosure of your Personal Information to our affiliates and to third parties for the recipients' own direct marketing purposes. To make such a request, please contact us in accordance with the "Contacting Us" section below.

Do Not Track: Please note that, at this time, we do not respond to Do Not Track (DNT) signals or similar signals.

YOUR CANADIAN PRIVACY RIGHTS

If you are a resident of Canada, you may request information regarding the disclosure of your Personal Information to our affiliates and to third parties for the recipients' own direct marketing purposes. To make such a request, please contact us in accordance with the "Contacting Us" section below.

SENSITIVE INFORMATION

we ask that you not send us, and you not disclose, any sensitive Personal Information (e.g., Social Security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background, or trade union membership) on or through the Services or otherwise to us.

UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy (including any constituent part included herein). The “Effective Date” at the top of this page indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Websites, Apps, and the Services, as applicable. Your use of the Websites, Apps, or the Services, as applicable, following these changes means that you accept the revised Privacy Policy.

CONTACTING US

If you have any questions about this Privacy Policy, please contact us via email at contactus@acjourneys.com or write to us at:

AC Journeys
c/o Jose Pineda
1988 NE 178th Street
North Miami Beach, FL 33162 USA
Attn: Customer Service/Privacy

Because email communications are not always secure, please do not include credit card or other sensitive information in the body of your emails to us.

Cookie Policy**Introduction**

This Cookie Policy (the "Cookie Policy") is included in our [Privacy Policy](#) and describes the different types of cookies that are used in connection with our Websites and Apps. All capitalized terms not defined herein shall take have the meaning set forth in our Privacy Policy.

What are cookies?

A cookie is a small text file that a web server saves on your computer or mobile device when you visit a website. It enables the website to remember your actions and preferences (such as log-in details, language, font size, and other functionality) over a period of time, so you don't have to keep re-entering them whenever you come back to the website or browse from one page to another. It may also be used for analytics and marketing purposes, such as, for example, generating analytics, such as information regarding site visits, or retargeting visitors (such as displaying advertisements for such website on other websites).

To learn more about cookies, please visit <http://www.aboutcookies.org/>.

What types of cookies do we use and how do we use them?

Generally speaking, we use 1st and 3rd-party session and persistent cookies. The cookies set by us are called "1st party cookies" and the cookies set by our third-party partners and service providers are called "3rd party cookies."

Session cookies are temporary cookies that remain on your device until you close your web browser. Many session cookies are essential to make our Websites and Apps work correctly, as they enable you to move around our Websites and Apps and use our features.

Persistent cookies remain on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or "lifetime" of the specific cookie and your browser settings). Persistent cookies help us recognize you as an existing user of our Websites and Apps, so it's easier and convenient to return to our Websites and Apps or interact with our Services without signing in again. In addition, persistent

cookies also help us recognize you when you view a resource belonging to our Websites or Apps from another website or apps (such as an advertisement) and help us record information about your web browsing habits during the lifetime of the persistent cookie.

1st and 3rd-party session and persistent cookies can be categorized further based on their particular function. Please see below for the categories of cookies that we use (which may originate from a 1st-party or 3rd-party domain), along with a description of their purposes:

Strictly Necessary Cookies

These cookies are strictly necessary for our Websites and Apps to function properly and ensure our Services accessible to you (e.g., log-in functionality, load balancing, navigation, filling in forms).

Performance and Functional Cookies

Performance cookies allow us insight into metrics such as visit count, most to least popular pages, and traffic sources so we can optimize the performance of our Websites and Apps. Functional cookies enable our Websites and Apps to provide enhanced features or settings based on your previous visits and selections, such as language preferences, remembering log-in details, and other conveniences.

Advertising Cookies

These cookies help ensure that we only show you relevant advertisements on our Websites, Apps, and on other sites. Essentially, these cookies help us create, and analyze the effectiveness of, our marketing campaigns, limit the number of times you see an advertisement, and track whether the advertisements have been properly displayed.

Analytics and Personalization Cookies

Analytics and personalization cookies allow us to analyze how you access and use our Websites and Apps in order to make our Services more useful and relevant to you. For example, we collect information concerning your booking or purchase history and other details, such as previous searches, to help provide more relevant travel options and deals for you based on the type of traveler you are.

Social Media Cookies

These cookies are used to allow you to share or like our pages and content through third-party social media websites.

How to control cookies?

In summary, like most online travel agencies, we use 1st-party and 3rd-party cookies to show you advertisements, emails, and content that we think will be relevant to you. To do so, we sometimes share information based on your use of the Websites or Apps to 3rd-party analytics and advertising providers (and they share information back, often in the form of reports, to make sure we're being effective). We also collect data based on your use of the Websites or Apps in order to improve and personalize your experience or provide features such as our Members-only functionality or remembering your log-in details.

In addition, many advertising providers offer you a way to opt-out of online behavioral advertising (or “targeted advertisements”) – for details, see www.youronlinechoices.com and www.youronlinechoices.eu. You can also delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit our Websites or Apps, as some Services and functionalities may not work.