# PRIVACY POLICY

This website https://www.CardinalPointsTravel.com (“Website”) is owned and operated by Cardinal Points Travel, LLC, a company registered in PA, USA (“we,” “our,” or “us”).

By accessing or using the Website, you (“you,” “your”) consent to this Privacy Policy and agree to its terms, including any updates to the policy as posted on the Website.

The Privacy Policy describes the kinds of information we may collect and record on this Website, how we may use the information, and your rights regarding the information. The policy applies to users of the Website and our activities on it. The policy is not applicable to information collected offline or through means other than the Website.

## California

If you are within the State of California, USA, you may have additional rights regarding privacy. Please refer to the California Privacy Policy https://www.CardinalPointsTravel.com, which we provide separately on the Website.

## Consent and Withdrawal

By accessing, using, or filling in forms available on the Website, you expressly consent to our collection, use, and limited disclosure of your personal, communications, technical, and marketing information as described in this Privacy Policy. At any time, you may withdraw your consent for our continued collection, use, or disclosure of your information or request updates to or deletion of your information by notifying us at christine@cardinalpointstravel.com. Please note, however, that we may retain certain information if we have a legal obligation or lawful basis to do so.

You may receive emails that offer services, promotions, subscriptions, registration-based services, or other materials from us or third parties. These emails will state who the email is from and provide information on how to contact the sender. If you no longer wish to receive such emails, you may opt-out of receiving them by clicking on the unsubscribe link included in each email. Alternatively, you may opt-out by sending us notification to christine@cardinalpointstravel.com.

## Information We Collect

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Your privacy is important to us, and we have taken steps to ensure that we do not collect more information from you than what is necessary for us to provide the Website and related products and services. When you access or use the Website, you may voluntarily submit, and we may learn and collect, information about you, your equipment, and your online activities, including the following types:

- **Personal Information**: This may include personal information relating to an identified or identifiable natural person, e.g., name, email, phone number, address, payment details such as debit-, credit-, or charge-card information for payment processing, and other information we may deem necessary to support the operation of the Website and related products and services. We also work with third-party companies who use personal information to process services for us.

- **Communications Information**: This may include information relating to communications you send to us through contact forms on the Website, email, or any other mode of communication you use to contact us. We process this information to communicate with you, to keep records, and to establish, pursue, or defend potential legal claims.

- **Technical Information**: This may include information about your use of the Website such as your IP address, login information, browser details, Website page views, length of visit to Website pages, navigation paths, frequency of use, time zone settings, and access devices. We process this information through our analytics tracking systems to analyze your use of the Website, to administer and protect the Website and our business, and to enable us to administer the Website.

- **Marketing Information**: This may include information about your communication preferences regarding marketing material from us and our third-party partners and affiliates. We process this information to analyze your use of the Website, to deliver relevant content and communications to you, to understand the effectiveness of our advertising, to determine our marketing strategy, and to grow our business.

## How We Use and Process Information

We may use the information to provide you the Website and related products and services, to better understand your needs in relation to our business, to correspond with you, and to reply to any of your questions

relating to our business. If you provide any information to us, you are deemed to have authorized us to collect, retain, and use that information for the following purposes:

- To verify your identity;
- To send you emails;
- To provide you with customer service and respond to your queries, feedback, or disputes;
- To conduct marketing analysis, send surveys or newsletters, contact you about the Website and related products and services, activities, special events, or offers from us or our partners and for other marketing, information, service development, and promotional purposes;
- To make such disclosures as may be required for any of the above purposes or as required by law, regulations, and guidelines or regarding any investigations, claims, or potential claims brought by or against us;
- To send you notices—e.g., in the form of emails, mailings, etc.—regarding services you are receiving and for billing and collection purposes;
- To provide and maintain the Website and related products and services;
- To notify you about changes to the Website or related products and services;
- To send you information we think you may find useful or you have requested from us;
- To improve the Website and related products and services, e.g., through personalized features and content;
- To analyze the use of the Website and related products and services and the people visiting to improve our content; and
- To investigate, prevent, or to act regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our policies, or as otherwise required by law.

We will use reasonable efforts to ensure:

- The information collected and processed for and on our behalf by any party is collected and processed in accordance with applicable data privacy laws;
- You are always made aware of the reasons for the collection of information and are given details of the purpose for which the information will be used;
- The information is collected only to the extent necessary to fulfill the purpose required;

- No information is held for longer than necessary in light of the purpose for which it is required;
- Whenever cookies or similar technologies are used online by us, they are used strictly in accordance with applicable laws;
- You will be informed if any information submitted by you online cannot be fully deleted at your request under normal circumstances and how to request deletion of any copies of that information, where it is within your right to do so;
- Appropriate technical and organizational measures are taken to protect the information;
- Information is transferred securely, whether it is transmitted electronically or in hard copy; and
- You can fully exercise your rights with ease and without hindrance.

**Disclosure of Information**

We will not transfer, rent, or sell your information to others without notice to you. We may store the information in locations outside our direct control —e.g., on servers or databases co-located with hosting providers. We may disclose your personal information in the following circumstances:

- To our subsidiaries, affiliates, service providers, and suppliers for the purpose of providing services to you;
- To other third parties, including lawyers or collection agencies, when necessary to enforce our terms or any agreement between you and us;
- In response to legal processes—e.g., court orders, subpoenas, or requests from a law enforcement agency;
- If we believe disclosure is necessary to investigate, prevent, or act with regard to:
    - Our compliance with a legal obligation;
    - Our rights or property;
    - Our potential legal liability;
    - Potential wrongdoing, illegal activity, suspected fraud, or violations of our terms; or
    - Potential risk of personal or physical harm to any person;
- In the event of a merger, acquisition, joint venture, restructuring, dissolution, or similar transaction, in which case we reserve the right to transfer your information to a new platform as part of that transaction;
- To our professional advisors, law enforcement agencies, insurers, and government, regulatory, and similar organizations; and
- Other circumstances where we believe in good faith such disclosure is necessary or appropriate.

## Information Storage

Your information may be stored and processed on servers within or outside the United States, wherever we or our subsidiaries, affiliates, or service providers maintain facilities. We may transfer your information to affiliated entities or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world. We will take all steps reasonably necessary to ensure your information is treated securely and in accordance with this Privacy Policy.

We will only retain your information for as long as necessary to fulfill the purposes described in this policy, including for the purpose of compliance with any record retention or reporting requirements under applicable laws. When determining the duration of information retention, we consider its nature, sensitivity, the potential risk of harm from unauthorized use or disclosure, the purposes of collection and processing, and alternatives to achieve such purposes.

## How We Protect Your Information

Any information supplied by you will be retained by us, stored in secure databases, and accessible by our employees, service providers engaged by us, and other third parties. No method of electronic storage or transmission over the internet or otherwise is 100% secure. While we strive to use commercially reasonable means to protect your information, we cannot warrant or guarantee your information will not be accessed, disclosed, altered, or destroyed, despite our industry-standard physical, technical, and managerial safeguards.

If you have any questions about security of the Website, please contact us at christine@cardinalpointstravel.com.

## Cookies and Tracking Technologies

We may use technologies such as cookies and web beacons to improve user experience, customize content, provide social media features, and analyze traffic to the Website. Where applicable, the Website uses a cookie control system allowing users on their initial visit to the Website to allow or disallow the use of cookies on their computer or device.

Cookies are small files saved to user computers or device hard drives or memory that track, save, and store information about user interactions and usage of the Website. This allows the Website, through its server, to provide users with a tailored experience within the Website.

Web beacons are small electronic files (also known as clear gifs, pixel tags, and single-pixel gifs) that allow us to count users visiting Website pages, track related Website statistics, such as the popularity of Website sections, as well as verify system and server integrity.

Web browsers generally allow you to delete certain cookies or reject cookies entirely. Using your browser settings, you may be able to manage other tracking technologies in the same way you manage cookies. If you choose to block cookies or other tracking technologies, you may impair Website operability or prevent some elements from functioning as intended.

We may gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and click-stream data. Log files do not identify individual users. We may use this information to analyze trends, administer the Website, track users' movements around the Website, and gather demographic information about our user base.

We may track the referring URL (i.e., the website or website page you left before coming to the Website) and the pages, links, and graphics of the Website you visited. We do so because it allows us to evaluate the reputation and responsiveness of specific web pages and any promotional programs we may be running.

Google is a third-party vendor supporting the Website. It also uses cookies, known as DART cookies, to serve ads to our site visitors of the Website. Users may decline the use of DART cookies by visiting the Google ad and content network privacy policy at: https://policies.google.com/technologies/ads.

## Advertising Partner Privacy Policies

To the extent advertisers are on the Website, they may use cookies, web beacons, and similar technologies used to measure the effectiveness of their advertising campaigns or personalize the advertising content. We have no access to or control over technologies used by third-party advertisers.

## Third-Party Service Providers

We may employ third-party companies and individuals to facilitate the Website operability, to provide, for example, the Website and related products and services on our behalf or to assist us in analyzing how the

Website and related products and services are used. These third parties have access to your information only to perform tasks on our behalf and are obligated not to disclose or use it for any other purpose. The Website may contain links to other websites not operated by us. If you click on a third-party link, you will be directed to that party's website. We have no control over, and no responsibility for, third-party websites, privacy policies, or practices. We advise you to carefully review the terms of use, privacy policies, disclosures, and other statements of each website you visit.

**Children**

The Website is not intended for use by anyone under the age of 18. We do not knowingly collect personal information from anyone under 18. If you are under 18 years of age:

- Do not use the Website;
- Do not provide any information about yourself on the Website, e.g., your name, mailing address, phone number, email address, screen name, username, etc.;
- Do not make any purchase through the Website; and
- Do not use any interactive functions on the Website.

If we discover we have collected or received personal information from a child under 18 without verified parental consent, we will take all reasonable measures to delete that information. If you believe the Website has collected or received information about anyone under 18 years of age, please contact us at christine@cardinalpointstravel.com.

**General Data Protection Regulation (GDPR) Rights**

If you are within the European Union, you are entitled to certain information and have certain rights under the GDPR, as described below.

We will retain any information you choose to provide to us until the earlier of:

- Your written request that we delete the information;
- Our decision to cease using our existing data providers; or
- We decide the costs of retaining the data exceed the value of retaining it.

You have the right to:

- Request access to your personal data we store;
- Either amend or erase your data;

- Seek restrictions on the processing of your data;
- Object to the processing of your data;
- The portability of your data;
- Withdraw at any time your consent to our processing your data without affecting the lawfulness of processing based upon consent that occurred prior to your withdrawal of consent; and
- Submit a complaint with a supervisory authority having jurisdiction over GDPR issues.

We collect only the information reasonably required to engage commercially with you. You will not be required to consent to any unnecessary processing as a condition of engagement with us.

If you would like to exercise any of these rights, please contact us at christine@cardinalpointstravel.com.

## Changes to this Privacy Statement

We may amend this Privacy Policy from time to time. Amendments become effective when we post them on the Website. You agree to be bound to any changes to the amended version of this Privacy Policy when you access or use the Website or related products or services. It is your responsibility to periodically review the Website, this Privacy Policy, and any related terms and conditions and to be aware of any amendments.

## Contact Us

If you have questions or comments about this Privacy Policy, please contact us at christine@cardinalpointstravel.com.

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