

**Last Updated: February 20, 2024**

## **Privacy Notice to Business Relations**

If you are a California or Virginia resident, please see our "[\*\*Supplementary Privacy Notice for US Residents\*\*](#)"

### **Introduction**

This site is controlled and operated by Panorama Travel Solutions, LLC f/k/a Resort Rental, LLC (operating as Holiday Rentals, LLC in IN, MD and TX), a corporation located at 6277 Sea Harbor Drive, Orlando, FL 32821 (referred to herein as "**PTS**", "**We**", "**Our**", "**Us**" or "**Panorama Travel Solutions**").

PTS respects your privacy and is committed to protecting it through compliance with this privacy notice.

Please read this privacy notice carefully to understand how we collect, disclose, and otherwise use ("**Process**") information that identifies or relates to you as an identifiable person ("**Personal Information**").

### **Scope and Application**

PTS provides a wide range of products and services, including travel clubs, to individual consumers and to businesses or other organizations through our websites, mobile and software applications, social media pages we control, and other online and offline activities such as when you provide your Personal Information on the phone via our call centers or in person (collectively, the "**Services**"). When Services are provided to businesses, enterprises, or other organizations, it is referred to as "**B2B Services**." This privacy notice ( the "**B2B Privacy Notice**") describes how PTS Processes Personal Information about employees or representatives of our existing and prospective business clients, suppliers, service providers, agents, consultants, advisors, business partners, and investors ("**Business Organizations**") in its role as a controller of Personal Information related to the B2B Services.

Please note that your access to and use of our B2B Services may be administered by your company or other organization to which you are a member. In such cases, personnel at your organization may have access to your Personal Information collected by these B2B Services, and your organization may have its own policies applicable to your use of the B2B Services. PTS is not responsible for the policies and practices of such Business Organizations, which may be different from this B2B Privacy Notice and any other applicable privacy notices. If your organization is administering your use of our B2B Services, please contact your company with any privacy questions or requests related to your use of the B2B Services.

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements, such that our practices may be more limited in such jurisdictions.

Our privacy practices also may vary amongst and between Panorama Travel Solutions and any of its other affiliated operating entities depending upon their function and their offered products and services. Please review the privacy notices linked to or referenced in their respective services.

If you or your company or organization have separate contractual agreements with us concerning our collection, use, or disclosure of your Personal Information, those agreements control and supersede anything stated in this B2B Privacy Notice.

## **Individual Access**

This B2B Privacy Notice does not apply to our processing of Personal Information about individual consumers interacting with us in their personal capacity, our employees, or our contractors (whether directly or indirectly contracted).

## **Personal Information We Collect and How It Is Collected**

When you access this website or engage with us by email or other transaction or interaction, we may collect the following Personal Information:

### **1. We may collect Personal Information about you such as your:**

- Name
- Title, rank or other designation held within your organization
- Business or organization name
- Postal address (including billing and shipping addresses)
- Phone number
- Email address
- Billing and financial details, including payment, insurance, fiscal and banking data
- Social media account information
- Stay, trip, product or service information, such as your preferred location/facilities, dates and number of people/children travelling with you
- Special needs or conditions that may impact your visit to our facilities
- Driver's license, government-issued ID, or passports
- Birthday and/or date of birth
- Geolocation information
- Communication, product, service or other preferences
- Your opinions, comments, suggestions, inquiries and other communications you provide to us

- Demographic information
- Audio/Visual recordings such as when you call our customer service phone number or participate in having a photo taken for an activity, resort, etc.
- Internet Click Activity on our websites
- IP address or Device ID
- Account registration ID and password
- Passwords
- Information required to screen individuals such as directors, officers, sole proprietors, and equity holders of our current and potential counterparties. This screening takes place against publicly available or government issued-sanctions lists and media sources.

The foregoing may include private contact information (versus business contact information), if necessary. It is possible that you may submit other Personal Information to PTS, for example in a question you ask through a contact page or submit in comment boxes.

**2. We may collect Personal Information from you when you interact with us such as when you:**

- Register for, subscribe to, use, or make a payment for a B2B Service
- Contact us with a question or request
- Use our Services
- Provide a review or comment
- Participate in a competition, promotional activity or sweepstakes
- Provide feedback or participate in a survey
- Participate in any loyalty or other programs
- “Like”, “Follow” or otherwise connect with or post to one of our social media pages
- Provide goods or services to us

**3. Other Personal Information we collect about you:**

- **Cookies:** Our Services may use “cookies” and similar technologies (collectively, “cookies”). Cookies are small text files this Website sends to your computer for recordkeeping purposes; this Personal Information is stored in a file on your computer's hard drive. Cookies make web surfing and browsing easier for you by saving your preferences so we can use these to improve your next visit to our Website.
  - One purpose of cookies is to simplify the use of the Website. For example, cookies may save a user's login details, so that they do not need to login every time.
  - Cookies may be either “persistent” or “temporary” (or “session”) cookies. A persistent cookie retains user preferences for a

particular Website allowing those preferences to be used in future browsing sessions and remains valid until its set expiry date (unless deleted by the user before the expiry date). A temporary cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

- Cookies are also used for statistical or marketing purposes, to determine how the Website is used. These cookies are provided by us or by third parties (e.g., advertising partners). While we do not control or have access to the advertiser cookies we do permit them to be used on this Website to facilitate tailored advertising and monitor patterns of buying specific goods or interest in - for example, holidays or hobbies. These cookies run advertisements tailored to the user based on your online buying habits.

- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases, joint marketing partners, data firms, social media platforms, from people with whom you are friends or otherwise connected on social media platforms, as well as from other third parties.
- **Mobile Devices:** When you use or access our Services from a mobile device, we may collect Personal Information such as your unique device ID and your location. If you download and use an 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 Personal Information and files have been downloaded to the App based on your device number, as well as any other Personal Information specified by the App in its terms or notices.
- **Google Analytics:** We use Google Analytics to help us get a better understanding of how visitors use this Website and to facilitate interest based advertising associated with your Google Account and other devices you use. The Personal Information generated by the Google Analytics cookie about your use of this Website is transmitted to and stored by Google. If you do not want your activity on this Website to be tracked by Google Analytics, you may update your cookie settings or opt out by using this link: <http://tools.google.com/dlpage/gaoptout?hl=en>.
- **Internet Based Advertising:** 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 our Services and other websites, apps or online services, based on Personal Information relating to your access and use of our Services and other websites, apps and services on any of your devices, as well as Personal Information

received from third parties. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They may also use these technologies, along with Personal Information they 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 how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Notice, please

visit [www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org) to opt out in mobile apps. You may also opt out in Twitter by going to your account privacy settings and unchecking the box next to “Tailor ads based on information shared by ads partners.”

- **Do Not Track Signals:** At this time, we do not respond to browser ‘do not track’ signals, as we await the work of interested stakeholders and others to develop standards for how such signals should be interpreted. Third parties, including our service providers, may collect Personal Information about your online activities over time and across different websites, including when you visit our website. You can learn about how to exercise choice regarding the collection of Personal Information about your online activities over time and across third party websites or online services by visiting <http://www.aboutads.info/> and <http://www.networkadvertising.org/>.

- **Data Collected Automatically:** In addition to any Personal Information or other information you choose to provide to us or that we otherwise collect about you as described in this Privacy Notice on the Services, we and our third-party service providers may use a variety of technologies, now and hereafter devised, that automatically collect certain website usage information whenever you visit or interact with the Services. This Personal Information may include browser type, operating system, the page served, the time, the source of the request, the preceding page view, and other similar information. We may use this usage information for a variety of purposes, including to enhance or otherwise improve the Services. In addition, we may also collect your IP address or some other unique identifier for the particular device you use to access the Internet, as applicable. When analyzed, usage information helps us determine how our Services are used, such as what types of visitors arrive at the Services, what type of content is most popular, what type of content you may find most relevant and what type of visitors are interested in particular kinds of content and advertising. We may associate your

website usage information with the Personal Information you provide, but we will treat the combined information as Personal Information.

We use Personal Information in a variety of ways, including to analyze site traffic, understand customer needs and trends, carry out targeted promotional activities and to improve our services.

As aggregated, de-identified or anonymized information does not constitute Personal Information, we may use it for any purpose.

## **Why and How We Use Your Personal Information**

### **We may Process Personal Information in connection with any of the following:**

#### **1. Our business transactions with you, including, but not limited to:**

- Entering into or performing a contract with you.
- Responding to your inquiries and fulfilling your requests.
- Sending administrative information to you, for example, information regarding the B2B Services or an event you are attending.
- Completing and fulfilling any purchases or requests for B2B Services.

#### **2. For our legitimate business interests, including, but not limited to:**

- Personalizing your experience on the Services by presenting products and offers tailored to you.
- Allowing you to participate in sweepstakes, contests, and similar promotions, and administering such activities (each of which may have additional rules and could contain additional information about how we Process your Personal Information).
- Facilitating social sharing functionalities of your social media account(s).
- Carrying out data analysis, audits, fraud monitoring and prevention, internal quality assurance, developing new products, enhancing, improving or modifying our Services, identifying usage trends, auditing use and functionality of our Services, helping enforce compliance with our Terms of Use, helping protect our Services, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- Subject to your marketing preferences (which may include consent to marketing under applicable law), to send you newsletters or marketing communications we believe may interest you, for our own products and

services, and on behalf of our Affiliates or selected third parties in accordance with applicable law.

**3. In accordance with any consent you may have provided.** You have the right to decline to provide your consent and, if consent is provided, to withdraw it at any time.

**4. As necessary or appropriate for legal reasons, including, but not limited to:**

- Under applicable law.
- Complying with legal process.
- Responding to requests from public and government authorities, including those outside your country of residence.
- Enforcing our terms and conditions in connection with the Services or any B2B Services.
- Protecting our operations or those of any of our Affiliates, or other third parties.
- Protecting our rights, privacy, safety or property, or that of our Affiliates, you or other third parties.
- Allowing us to pursue available remedies or limit damages we, our Affiliates, or other third parties, may sustain.

## **When We Disclose Your Personal Information**

**We may disclose your Personal Information as follows:**

- **Affiliates:** We may disclose your Personal Information to any other entity that is directly or indirectly controlled by, or under common control with us, including but not limited to any member of the Panorama Group of Companies (“Affiliates”) for the purposes described in this B2B Privacy Notice, including under “**Why and How We Use Your Personal Information**,” unless otherwise prohibited by applicable law. You can find more information about our primary operating Affiliates in our Annual Report as of the date the Annual Report was published or by contacting us at the contact information set forth below in the section titled “[How Can You Contact Us?](#)”.
- **Vendors and Service Providers:** We may disclose your Personal Information to vendors and service providers we retain in connection with our business such as: travel services companies, financial services companies, property owners’ associations, vacation insurance companies, website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, tax and financial advisers, legal advisers, accountants, auditing services or others.

- **Business Partners, Sponsors, and Other Third Parties:** We may disclose your Personal Information to other Business Relations, co-sponsors of promotions, and other third parties in order to provide you with B2B Services that may interest you and to complete any requests for services. For example, we may co-sponsor promotions, sweepstakes, or other events with a third party and may share your Personal Information in connection with these events. Personal Information provided to these third parties will be subject to each third parties' own privacy practices and policies.
- **Message Boards:** We may make reviews, message boards, blogs, and other such user-generated content facilities available to users. Any Personal Information disclosed in these areas becomes public information and you should always be careful when deciding to disclose your Personal Information. We are not responsible for privacy practices of other users including website operators to whom Personal Information is disclosed.
- **Change in Control:** We may disclose your Personal Information to a third party (e.g., prospective buyers and insolvency practitioners) in connection with any change in control of any part of our business or the business of any of the T+L Affiliates, including, without limitation, merger, consolidation, divestiture, spin-off, purchase of all or a substantial portion of our assets, dissolution, liquidation, administration, receivership or other form of insolvency.
- **Disclosure Permitted by Law:** We may disclose your Personal Information to law enforcement authorities, government or public agencies or officials, regulators, and/or to any other person or entity having appropriate legal authority or justification for receipt of your Personal information, if required or permitted to do so by law or legal process, to respond to claims, or to protect our rights, interests, privacy, property or safety, and/or that of our Affiliates, you or other third parties.

## **How Do We Safeguard Your Personal Information?**

**Security of Your Personal Information:** We will take reasonable steps to protect the Personal Information you provide us from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have implemented appropriate physical, electronic and managerial procedures to help safeguard and secure your Personal Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Unfortunately, no security system is 100% secure, thus we cannot ensure the security of all Personal Information you provide to us via the Services.

## **Other Important Personal Information**

- **Personal Information Provided on Someone Else's Behalf:** If you provide us with Personal information about someone else, please ensure you have the person's permission to do so for the purposes detailed in this B2B Privacy Notice.
- **Links to Websites:** The Services may have links to other websites that are not operated by us; we have no control over how these websites may collect your Personal Information and no liability for the practices, policies and security measures implemented on these websites. You should read the privacy notices on those other websites before you submit your Personal Information through them.
- **Social Media Sites:** Please note that we are not responsible for the collection, usage and disclosure policies and practices (including data security) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with our applications or social media pages.
- **Sensitive Personal Information:** The Personal Information we collect from you may include sensitive Personal Information, which we only collect with your consent. We limit the use of your sensitive Personal Information to that use which is necessary to perform reasonably expected services or as required by law. If you refuse to provide such Personal information, it may affect the delivery of our services or make us unable to provide services to you. However, unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any sensitive Personal Information such as Social Security number, passport number, driver's license number, or other government-issued identification number; financial account details, with or without any information that would permit access to the account, or credit history; or information on race, religion, ethnicity, sexual practices or sexual orientation, medical or health information, genetic or biometric information, political or philosophical beliefs, trade union membership, background check information or criminal records.
- **Minors:** We do not knowingly collect, maintain or use Personal Information provided by individuals under 16 years of age in connection with, and no part of our websites, social media pages, and mobile and software applications is directed to, individuals under the age of 16. If we do discover we have collected Personal Information from minors in violation of applicable law, we will delete it.
- **International Transfers:** We are an international company and we may, subject to applicable law, transfer your Personal Information, to any of the T+L Affiliates or selected third parties outside the country where you are located

and where Personal information protection standards may differ (e.g., your Personal Information may be stored on servers located in other jurisdictions). We will utilize appropriate safeguards governing the transfer and usage of your Personal Information.

- **Retention Period:** We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this B2B Privacy Notice unless a longer retention period is required or permitted by law.
- **Changes to Our Privacy Notice:** From time to time we may revise this B2B Privacy Notice. Updated versions will be posted on the respective Services.

## **Your Choices and Rights**

- **Changes to Your Marketing Preferences:** You can change your marketing preferences by:
  - Using the unsubscribe function in the email you receive from us;
  - Logging into your account (if the Service offers an account with such functionality); or
  - Contacting us as set forth under “[How Can You Contact Us?](#)” below.
- **Withdrawing Your Consent:** You may withdraw any consent you have provided to us to Process your Personal information at any time.
- **Accessing your Personal Information:** In accordance with applicable law, you may access the Personal Information we Process about you.
  - Any request to access or obtain copies of your Personal Information must be made in writing by contacting us as set forth under “[How Can You Contact Us?](#)” below. We may also ask you to log into your account, verify your identity and to provide further details relating to your request.
- **Correcting your Personal Information:** We will take reasonable steps to ensure the accuracy of the Personal Information we retain about you. It is your responsibility to ensure you submit true, accurate, and complete Personal Information to us, and timely update us in the event this information changes. You may request that any inaccurate or incomplete Personal Information held by us or on our behalf is corrected, by contacting us as set forth under “[How Can You Contact Us?](#)” below.
- **Deleting your Personal Information:** Under certain circumstances, you may request we delete Personal Information we hold about you by contacting us as set forth under “[How Can You Contact Us?](#)” below. We will assess your request and determine, under applicable law, whether we are required to delete this Personal Information.
- **Objecting to Processing:** If you would like us to stop Processing your Personal Information, you can request this by contacting us as set forth

under “**How Can You Contact Us?**” below. We will assess your request and determine, under applicable law, whether we have any justification for the continued Processing.

- **Transferring your Personal Information:** Under certain circumstances, you may receive your Personal Information in a format that allows you to send it to another company or to direct us to transfer it directly to another company.

## **How Can You Contact Us?**

If after reviewing this B2B Privacy Notice, you have any questions, complaints or privacy concerns, or would like to make any requests in relation to your Personal Information, or obtain further information on safeguards used for international transfers please send an email to our Privacy Officer at [B2Bprivacy@travelandleisure.com](mailto:B2Bprivacy@travelandleisure.com) or send a letter to:

Panorama Travel Solutions, LLC  
*Attn: Legal Services-Privacy*  
6277 Sea Harbor Drive  
Orlando, FL 32821

If you have a complaint or concern about how we Process your Personal Information, we will work to address such concern(s). Also, you may contact us at [B2Bprivacy@travelandleisure.com](mailto:B2Bprivacy@travelandleisure.com). You may also direct your complaint/concern to the applicable data protection authority.