

Last Updated: February 20, 2024

Supplementary Privacy Notice for US Residents: Click here to read about “[Your Privacy Rights](#)” and your additional rights if you are a resident of **California, Nevada** and **Virginia**.

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 is the data controller of your Personal Information.

PTS respects your privacy and is committed to protecting it through compliance with this privacy notice (“**Privacy Notice**”). Please read this privacy notice carefully to understand how we collect, disclose, and otherwise use (“**Process**”) your Personal Information.

This Privacy Notice describes our practices in connection with Personal Information we collect through our websites (“**Websites**”), social media pages we control (“**Social Media Pages**”), and software applications we make available for use on or through computers and mobile devices (“**Apps**”), that include a link to this Privacy Notice, and through any of our offline activities, such as when you provide your Personal Information on the phone via our call centers or in person (“**Offline Activities**”) (collectively, including the Websites, Apps, Social Media Pages, and Offline Activities, the “**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 among our Affiliates (as defined below) and brands depending upon their function and their offered products and services. Please review the privacy notices linked to or referenced in their respective services.

Please read the following to learn more about our privacy practices.

What Personal Information Is Collected and How Is It Collected?

1. We may collect “Personal Information” (information that identifies you or relates to you as an identifiable person) about you such as your:

- Name

- Postal address (including billing and shipping addresses)
- Phone number
- Email address
- Credit or debit card number
- Financial information in certain circumstances
- Birthday or Date of Birth
- Social media account information
- Stay, trip, product or service information, such as your preferred location/facilities, dates and number of people/children traveling with you
- Special needs or conditions that may impact your stay
- Driver's license, government-issued ID, citizenship, and/or passports
- 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
- Subscribing Account or Membership ID
- Passwords

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 product or service
- Contact us with a question or request
- Use our Services
- Make a reservation
- Stay at one of our affiliated resorts
- Provide a testimonial or story, or post or submit a photo, 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 (for example, as a vendor or contractor)

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 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.

- **Pixels, Beacons:** We or third party ad servers, including Facebook, may use cookies or invisible pixels or beacons on this Website to count how many users visit certain pages or take certain actions to collect or receive information from this Website and elsewhere on the Internet. We may use this information to improve our marketing programs and content, and to target advertisements at this Website and/or on other sites.
- **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 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 aboutads.info and 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 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 Services or an event you are attending
- Completing and fulfilling any purchases or requests for 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), sending 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.
- To allow you to send messages to a friend through the Services. By using this functionality, you are telling us that you are entitled to use and provide us with your friend's name and email address

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
- 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 (“**Affiliates**”) for the purposes described in this Privacy Notice, including under “**Why and How We Use Your Personal Information**”, unless otherwise prohibited by applicable law or by contractual agreement with our vendors, service providers or other third parties. 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?**”. Information provided to these affiliates will be subject to each affiliate’s privacy practices and policies.
- **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, magazine publishers, information technology and related infrastructure provision, customer service, email delivery, credit card processing, tax and financial advisers, legal advisers, accountants, auditing services or others. Information provided to these vendors will be subject to each vendor’s privacy practices and policies.
- **Business Partners, Sponsors, and Other Third Parties:** We may disclose your Personal Information to business partners, co-sponsors of promotions, and other third parties in order to provide you with services that may interest you and to complete or fulfill any purchases or request for services. For example, we may share your Personal Information with the owners and operators of affiliated and unaffiliated hotels and resorts, airlines, car rental services, activity or excursion providers, travel insurance

providers, credit agencies, retail stores, magazine publishers, and other third parties to facilitate reservations, to offer you products or services, or in connection with any loyalty program we may provide or a loyalty program of one of our partners. We may also co-sponsor promotions, sweepstakes, or other events with a third party and may share your Personal Information in connection with these events. Further, we may share your Personal Information with third party providers located on-site at hotels or resorts, such as time-share, spa, golf, concierge, and dining providers. Information provided to these third parties will be subject to each third party's privacy practices and policies.

- **Resorts or Business Partners:** We may share Personal Information with affiliated resort operators in order to provide you with services, facilitate a booking you requested, generate leads in connection with their offers to sell timeshares to you, to facilitate their understanding of their owners' exchange history and utilization, or to respond to your inquiry for further information about mini-vacations at resorts where a resort tour is either required or requested of you by the resort operator.
- **Message Boards:** We may make reviews, message boards, blogs, and other such user-generated content facilities available to users. Any 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 our 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.
- **Third Parties:** Subject to your marketing preferences (which may include consent to marketing under applicable law), **we may license, sell, or otherwise share your Personal Information with selected third parties for compensation** for their own business purposes. Once we share your Personal Information with a third party for such purposes, the information shared becomes subject to such third party's privacy practices.
- **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 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 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, Blackberry, Twitter 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 the Apps or our Social Media Pages. Any posts you make on our Social Media Pages may be available to others who use those pages. Never include sensitive personal, financial, or other confidential information such as your social security number, address, phone number or email address when posting or commenting online. Please refer to the privacy policies of our social media partners when you interact with them online.
- **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 18 years of age in connection with, and no part of our Websites, Social Media Pages, and Apps is directed to, individuals under the age of 18. 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 our 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, for example, Standard Contractual Clauses.
- **Retention Period:** We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this 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 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);
 - 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, to 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 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 the Processing of 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 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 Group at Privacy@rci.com or send a letter to (please indicate our Affiliate or brand you typically do business with):

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 call us at **1-844-724-4444**. You may also direct your complaint/concern to the applicable data protection authority.