

Privacy Policy

1. Introduction

- 1.1 The family of companies at Wyndham Worldwide Corporation (collectively, the "Wyndham Group of Companies"), which includes Resort Condominiums International, its sister and subsidiary companies (together, the "RCI Group of Companies"), both to which RCI Europe ("RCI" or "we", "us", or "our") belongs, recognise the importance of protecting the privacy of certain general information ("data") and specific personal information ("Personal Data") collected about our customers (referred to as "Customers", "you", or "your") and consequently respect your privacy. This privacy statement discloses what information we gather, how we use it, and how to correct or change it. At RCI it is our intention to give you an understanding about how we collect your information and the use we make of it in the course of our business.
- 1.2 RCI has reviewed its policies, processes, procedures and practices to ensure that they meet legislation introduced within the European Economic Area (EEA), which includes the European Union (EU), in line with the EU Data Protection Directive (95/46/EC) and the EU Telecommunications Data Protection Directive (97/66EC) ("the Directives") and will continue to ensure that its policies, processes, procedures and practices comply in all respects with any future laws and regulations in relation to your privacy.
- 1.3 The purpose of this document is to inform you of the policies that have been put in place to protect your interests in this respect.

2. Fair and lawful information-handling

We will process all data that we collect and hold on you fairly and in accordance with applicable law. As further explained in this privacy policy, we will ensure the quality and security of your data (even if the data are transferred to other companies in Europe or elsewhere); and we will fully respect your rights, interests and privacy with regard to your data.

3. Legitimate purposes

- 3.1 We will only collect, record, process and store data which are needed to fulfil our contractual obligations towards our Customers, our affiliated or related entities, associates, partners, and the customers of such affiliated or related entities, associates and partners; to serve other legitimate business interests such as credit assessment or marketing; or to comply with legal requirements.
- 3.2 We may disclose to any other company or companies within the Wyndham Group of Companies and the RCI Group of Companies, and to third parties authorised by us, such information as may be necessary to provide you with products and services you have requested or for the purpose of verification of details relating to your data held by us for legitimate purposes.

4. Data quality

4.1 We will employ effective procedures and safeguards to ensure that data we hold on you are adequate, relevant and not excessive in relation to the purposes for which they were obtained, as well as accurate and up-to-date. Where we become aware of any inaccuracies in data we hold, we will correct and, where appropriate, delete incorrect data.

4.2 Retention periods are in place to ensure that data are only stored whilst they are required for the purposes in question or to meet legal and regulatory requirements. Where data are no longer required, we will ensure that they are disposed of in a secure manner.

5. Information to you

5.1 When we collect data from you, we will identify ourselves and inform you of the purpose(s) for which we are collecting data. If we are collecting data from you on behalf of one of our sister or subsidiary companies, or affiliated or related entities, associates or partners, we will identify that sister or subsidiary company or affiliated or related entity, associate or partner (the "controller" in terms of the European data protection regime) and explain that we are acting as the agent (or "processor") for that other company. If our affiliated or related entity, associate or partner is a non-European company which has appointed a representative in Europe in accordance with the Directives, we will also inform you of the identity of that representative (which may be RCI). If we have obtained data on you other than directly from you, we will inform you of this as soon as practicable after we have entered data in our files or computers (unless you were already aware of the fact).

5.2 We may also record or monitor telephone calls to and from any of the Wyndham Group of Companies or the RCI Group of Companies (including RCI), without notification, for staff training and quality control purposes.

6. When will we seek your prior consent?

6.1 In certain circumstances we ask for your prior consent :

6.1.1 if we intend to carry out a credit check on you;

6.1.2 before we pass on any of your Personal Data to other companies for direct marketing purposes, by offering you the opportunity to object to such disclosures either through a "tick-box" or an "opt-out" box on your purchase order form or booking form or membership application or enrolment form, or by asking you to notify us by telephone, fax or e-mail. (If you use more than one e-mail address to communicate with us, please notify us of each e-mail account you use); or

6.1.3 if we process sensitive data on you under any contract with you (or under a contract between you and a company we represent).

7. Special restrictions on the use of sensitive data

7.1 We will not normally seek data on your racial or ethnic origins, political opinions, religious or other beliefs, trade-union membership, physical or mental health, sex life

or criminal convictions. When we do collect such data, it will be limited to data which are:

- 7.1.1 required to be kept by law;
- 7.1.2 needed for legal proceedings or to establish, exercise or defend legal rights (including protection against fraud);
- 7.1.3 clearly and strictly necessary to fulfil a contract between you and us (or between you and a company we represent), or
- 7.1.4 needed to protect your vital interests or the vital interests of another person (for instance, if medical data are urgently required after an accident and you cannot give your consent).

8. Your rights

- 8.1 You have the right to require us or our affiliated or related entities, associates or partners to cease the communication of advertising or marketing materials to you, and we will ensure that your request is complied with. This includes the right to withdraw your consent to third-party direct-marketing use of your data at any time.
- 8.2 You have the right to see all data that we hold on you. Should you wish to have access to all or a particular part of your data, please contact the Data Protection Co-ordinator at RCI Europe, Kettering Parkway, Kettering, Northants NN15 6EY, United Kingdom. Such access will be granted in accordance with the requirements of applicable national legislation and subject to any discretionary allowance for RCI to make a charge payable by you to cover RCI's administration costs incurred in providing you with such data. Such payment is to be made on application for access to your data and is to be no more than the maximum stipulated by applicable national legislation. The information will be forwarded to you within an appropriate period of time in accordance with applicable national legislation, but in any event no more than 40 days from the date of such request for access.
- 8.3 Where any discrepancies are discovered following your enquiry, we will take immediate steps to validate and, where appropriate, correct our records. We will confirm the actions taken in writing to you within an appropriate period of time in accordance with applicable national legislation, but in any event no more than 40 days after receiving your request to amend our records.

9. Security of information

We will only provide access to data on you to those of our employees who need such access in order to carry out any necessary processing. We have taken appropriate steps to ensure the security of data, whether it is stored in computer systems, paper files or other storage media. We expect the same high standards of security and confidentiality of any agents or sub-contractors we employ to process data for us.

10. Transfer of information outside the EEA

- 10.1 Data on you may, on occasion, be transferred to RCI Group Companies' facilities or any company within the RCI Group of Companies, or to any other company or

companies within the Wyndham Group of Companies, or to its or their affiliated or related entities, associates or partners, or to data processing agencies ("processors") or third parties, outside the EU or the EEA for analysis, technical processing or other legitimate purposes. The countries where such other facilities or companies are situated may have no data protection legislation, or laws which are less rigorous than the legislation introduced by the Member States of the EU and the EEA. In such cases, we will ensure that your rights with regards to any such processing and your data will still be adequately protected.

- 10.2 Within the Wyndham Group of Companies we have agreed world-wide acceptance of the European standards with regard to the processing of Personal Data from all our European companies, including RCI. If we transfer your Personal Data to agencies or third parties outside the EEA, we require similar, binding contractual undertakings, and we monitor compliance. Our affiliated or related entities, associates and partners have agreed to adopt equivalent measures.

11. Direct marketing

- 11.1 We, or any other company or companies within the Wyndham Group of Companies or the RCI Group of Companies or third parties authorised by us, may market to you directly through any media to keep you informed of further offers from us, or any other company or companies within the Wyndham Group of Companies or the RCI Group of Companies or third parties authorised by us, which may be of interest to you (unless you write to us asking us to exclude you from such offers or alternatively telephone, fax or e-mail us to that effect or you have done so previously and such exclusion is still operative) and for our own administration, market analyses and operational reviews. (If you use more than one e-mail address to communicate with us, please notify us of each e-mail account you use.)
- 11.2 We, or any other company or companies within the Wyndham Group of Companies or the RCI Group of Companies or third parties authorised by us, may make contact with you by post, e-mail, telephone (including automated dialling equipment), facsimile transmissions, and/or pre-recorded messages for the purposes set out herein (unless you notify us either in writing or by telephone, fax or e-mail that you object to being contacted in a particular stated way and/or by a certain stated company or companies within the Wyndham Group of Companies or the RCI Group of Companies or by third parties authorised by us). (If you use more than one e-mail address to communicate with us, please notify us of each e-mail account you use.)
- 11.3 We, or any other company or companies within the Wyndham Group of Companies or the RCI Group of Companies or third parties authorised by us, will always act according to your wishes and preferences. Whenever we, or any other company or companies within the Wyndham Group of Companies or the RCI Group of Companies or third parties authorised by us, directly market to you by telephone or fax, we, or any other company or companies within the Wyndham Group of

Companies or the RCI Group of Companies or third parties authorised by us, will comply beforehand with the requirements of applicable national legislation under and by which you have recorded your desire not to be contacted by telephone and/or fax, as the case may be, for the purposes of direct marketing by any organisation. If you have notified such desire according to the laws of your country of domicile, then we will not call or fax you unless you subsequently notify us directly (either in writing, or by telephone, fax or e-mail) that this no longer applies or at least does not apply to any other company or companies within the Wyndham Group of Companies or the RCI Group of Companies or to third parties authorised by us. (If you use more than one e-mail address to communicate with us, please notify us of each e-mail account you use.)

12. Internet

12.1 RCI is the sole controller in the EEA/EU Member States of all data held in relation to your use of our Web sites and all processing of data relating to your requirements and requests is therefore (in accordance with EC Directives 95/46/EC and 2002/58/EC) subject to the data protection laws and regulations of your country of domicile. If no such laws and regulations exist in your country of operation, then all processing of data relating to your requirements and requests is subject to United Kingdom data protection laws and regulations only.

12.2 RCI gathers two types of information about Customers: data that Customers provide through optional, voluntary registration on our Web sites; and data RCI gathers through aggregated tracking, mainly by tallying page views throughout our Web sites. Such information enables us to tailor our content to meet our Customers' needs and to help our affiliated or related entities, associates or partners; or third party content providers, advertisers, merchants, sponsors and licensors (collectively, "Providers") that have licensed their content or the right to market their products and/or services to understand our Customers. RCI derives its revenue mainly from advertising and e-commerce and therefore providing such aggregated data is essential to keeping our service free to Customers. However, be assured that RCI will not disclose Personal Data to third parties without your consent, except as may be noted in this privacy policy or disclosed to you when data is submitted.

13. How does RCI collect information?

13.1 Optional registration

13.1.1 We collect data by specifically requesting it from you. Generally, this occurs when you register at one of our Web sites or request information or a service. For example, we may need to know your name, e-mail address, mailing address and contact telephone number, facsimile number and other related information. This allows us to process and fulfil your requirements and requests. Usually, the RCI Web sites and RCI's affiliated or related entities, associates or partners use your data to operate the Web sites and to deliver

services. The RCI Web sites also use your data to inform you about other products or services available from RCI, its affiliated or related entities, associates, partners or Providers.

13.1.2 We will maintain records relating to your use of our Web sites (including information about you provided by yourself or by Providers and other third parties). We shall be entitled to process those data for the purpose of providing your requirements and requests, for RCI's own administration, market analyses and operational reviews, and to keep you informed of further aspects of RCI and its operation which may be of interest (unless you write to us asking us to exclude you from such further contact or alternatively telephone, fax or e-mail us to that effect). (If you use more than one e-mail address to communicate with us, please notify us of each e-mail account you use.) We shall be entitled to disclose to any other company or companies within the Wyndham Group of Companies or the RCI Group of Companies, and to Providers or other third parties authorised by us (including without limitation resorts, owners' associations, resort trustees, management companies and resale companies, airlines, insurance companies, ferry companies, cruise companies and other suppliers), such information as may be necessary to provide your requirements and requests or for the purpose of verification of details relating to any requests for information on-line you may make to RCI.

13.2 **Usage tracking - Use of Internet Protocol ("IP") Addresses**

13.2.1 An IP address is a unique number that is automatically assigned to your computer whenever you are surfing the World Wide Web (otherwise known as the "Internet"), so that your computer can be identified by the main computers, known as "Web servers", that "serve up" Web pages.

13.2.2 RCI and/or its affiliated or related entities collect IP addresses for the purposes of system administration, to report aggregated information to Providers, and to audit the use of our Web sites. When Customers request pages from those Web sites of RCI, and/or its affiliated or related entities, associates, partners, and/or Providers, our Web servers log the Customers' IP addresses. We do not normally link IP addresses to anything personally identifiable, which means that a Customer's session will be logged, but the Customer will remain anonymous to us. We can and will use IP addresses to identify a Customer when we feel it is necessary to enforce compliance with our Web sites' terms of use or terms of service, or to protect our service, our Web sites or those of our affiliated or related entities, associates, partners or Providers, our other Customers or the customers of our affiliated or related entities, associates, partners or Providers, or others.

14. **Use of Cookies**

- 14.1 What are cookies? Cookies are small pieces of information that a Web site sends to your computer for record-keeping purposes, which information is stored in a file on your computer's hard disk. Cookies make Web-surfing easier for you by saving your preferences so that, for example, we can use the saved information to facilitate your use of our Web sites when you return to them. Cookies do not tell us your individual identity unless you have chosen to provide it to us. We never save passwords or credit card information in cookies. The use of cookies is an industry standard and, as such, you will find that most major Web sites use them.
- 14.2 By showing how and when Customers use the RCI Web sites, cookies help us to determine which areas are popular and which are not. Many improvements and updates to our Web sites are based on such data as total numbers of visitors and pages viewed. This information is most easily tracked with cookies. We use the information from cookies to provide services better tailored to our Customers' needs.
- 14.3 Most cookies expire after a defined period of time, or you can delete your cookie file at any time. Most browsers are initially set up to accept cookies. You can re-set your browser to refuse all cookies or to indicate when a cookie is being sent. However, note that some parts of www.rci.com and/or its affiliated or related entities', associates', partners', Providers' and other third parties' services will not function properly or may be considerably slower if you refuse cookies. For example, without cookies you will not be able to set personalised preferences, and/or may have difficulty completing on-line transactions.
- 14.4 You may occasionally receive cookies from Providers and other third parties. RCI and/or its affiliated or related entities do not control these cookies. The use of advertising cookies sent by third party Web servers is standard in the Internet industry.
- 15. With whom does www.rci.com share my Information?**
- 15.1 As a general rule, RCI will not disclose any Personal Data that you submit to us about you in a manner that connects you with the Personal Data, except when we have your permission or under special circumstances, such as when we believe in good faith that the law requires it or under the circumstances described below. The following describes some of the ways that your Personal Data may be disclosed:
- 15.1.1 Business Partners & Sponsors: We may disclose some or all of your Personal Data to business partners or sponsors, but this use will be specifically described to you prior to data collection or prior to transferring any such Personal Data. Many promotions offer opportunities to request additional information from sponsors. By requesting more information, you give RCI permission to transfer your Personal Data to the sponsor so they can fulfil your request. In many instances, only your e-mail address will be shared. If more Personal Data will be shared with the sponsor, then you will be notified prior to the transfer.

- 15.1.2 Third Party & Aggregate Data: From time to time, you may be offered the opportunity to receive materials or special offers from Providers or third parties. If you opt to receive information from Providers or these third parties, RCI will (with your permission) share your name and e-mail address with Providers and such third parties. Under confidentiality agreements, RCI may match your Personal Data with data about you held by Providers and third parties.
- 15.2 We may monitor RCI affiliated resort traffic patterns and usage of our Web sites to help us develop their design and layout. We may also use Personal Data that we collect to occasionally notify you about important functionality changes to our Web sites, and to notify you of new products or services and special offers that RCI thinks you will find valuable and of interest.
- 15.3 Also, we may keep track of what portions of our Web sites Customers are visiting and other Customer statistics, such as aggregate information about resorts affiliated to RCI, prospective members of RCI making enrolment applications, members of RCI making exchange requests, exchange reservations and renewals, RCI sales, and RCI affiliated resort traffic patterns and usage of the RCI Web sites, which may be provided to reputable third parties in order to help us create a better experience for users of our Web sites. This is done without knowing your name or other Personal Data in order to describe our Customers to prospective partners, Providers, and other third parties, and for other lawful purposes.
- 15.4 We may also disclose account data of Customers in special cases when we have reason to believe that disclosing this data is necessary to identify, contact or bring legal action against someone who may be violating RCI's terms of use or terms of service, or may be causing injury to or interference (either intentionally or unintentionally) with any of RCI's rights or property, our other Customers, or anyone else. RCI may disclose or access account data when we believe in good faith that the law requires it and for administrative and other purposes that we deem necessary to maintain, service, and improve our products and services to our Customers.
- 16. How can you control the usage of information?**
- 16.1 In the event that you change your mind or some Personal Data changes (such as your e-mail address), we will provide a way to correct, update or remove the Personal Data that you give us. We also give you the opportunity to control the communications that we direct to you. We will always seek your consent before disclosing Personal Data relating to you for the making of offers by our affiliated or related entities, Providers and other third parties by informing you of an intention to process your Personal Data for such purposes, and offering you a possibility to "opt out" of such use of your Personal Data, in a form or document returned to us or by notifying us by telephone, fax or e-mail. (If you use more than one e-mail address to communicate with us, complete this form for each e-mail account you use.) If a

Customer wishes to update Personal Data or objects to any usage provided herein for any reason, he/she may e-mail the requested change to: customerservices@europe.rci.com.

16.2 You are entitled to receive a copy of any data held by us on you in accordance with the requirements of applicable national legislation and subject to any discretionary allowance for RCI to make a charge payable by you to cover RCI's administration costs incurred in providing you with such data. Such payment is to be made on application to the Data Protection Co-ordinator at RCI Europe, Kettering Parkway, Kettering, Northants NN15 6EY, United Kingdom for access to your data and is to be no more than the maximum stipulated by applicable national legislation. The information will be forwarded to you within an appropriate period of time in accordance with applicable national legislation, but in any event no more than 40 days from the date of such request for access.

16.3 Where any discrepancies are discovered following your enquiry, we will take immediate steps to validate and, where appropriate, correct our records. We will confirm the actions taken in writing to you within an appropriate period of time in accordance with applicable national legislation, but in any event no more than 40 days after receiving your request to amend our records.

17. What happens when you link to a third party Web site?

17.1 You should be aware that when you are on RCI's and/or its affiliated or related entities' Web sites you could hyperlink or be directed to other Web sites that are beyond our control and/or outside our service. For example, if you "click" on a banner advertisement or a www.rci.com search result, the "click" may transfer you off the RCI Web site. These other Web sites may include Web sites of Providers that may use RCI's and/or its affiliated or related entities' logos as part of a co-branding agreement. These other Web sites may send their own cookies to Customers, and collect or solicit data and Personal Data.

17.2 RCI and its affiliated or related entities do not control or endorse such third party Web sites and, therefore, are not responsible for their content, information, material, products, services or the hyperlinks or advertising contained or accessible through such Web sites. RCI's and/or its affiliated or related entities' inclusion of hyperlinks to these third party Web sites does not imply any endorsement of the material on such Web sites or any association with their operators. RCI's policy does not extend to anything that is inherent in the operation of the Internet, which is beyond RCI's and/or its affiliated or related entities' control.

17.3 Please keep in mind that whenever you give out information on-line (for example, via message or bulletin boards or chat rooms) that information can be collected and used by people you do not know. While RCI and/or its affiliated or related entities strive to protect their Customers' data and Personal Data, as well as privacy, we cannot

guarantee the security of any information you disclose on-line, and you disclose such information at your own risk.

17.4 We will not send you e-mails that you do not want, but we cannot guarantee that Providers and other third parties to whom your details are sent will not do so.

17.5 Is my Information secure from others using the www.rci.com Web site? The security of all data associated with our Customers is an important concern to us. We exercise a high degree of care, skill and due diligence in providing secure transmission of your data and Personal Data from your computer to our Web servers. Unfortunately, no data transmission over the Internet is 100% secure. As a result, while we strive to protect your data and Personal Data, RCI and/or its affiliated or related entities cannot ensure and do not warrant the security of any information you transmit to us or from our on-line products or services, and you do so at your own risk. Once we receive your transmission, RCI uses industry standard efforts to safeguard the confidentiality of your data and Personal Data, such as firewalls and secure servers. When you use our Web sites for transactional purposes the secure server software - Secure Socket Layers ("SSL") - encrypts all credit card details you input before it is sent to us. We use Verisign as an officially recognised trusted third party to authenticate and certify the security of our Web sites and to encrypt your credit card details. However, "perfect security" does not exist on and in the use of the Internet.

17.6 If at any time you feel that RCI has not adhered to the principles, processes, procedures and practices contained in this privacy policy, please either notify us in writing or by telephone, fax or e-mail and we will use all commercially reasonable efforts to determine and correct the problem promptly. RCI welcomes your questions and comments about privacy.

18. YOUR ACCEPTANCE OF THESE TERMS

By using this Web site, you signify your agreement to RCI's privacy policy. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, PLEASE DO NOT USE THIS WEB SITE. Your continued use of RCI's and/or its affiliated or related entities' Web sites following the posting of changes to these terms will mean that you accept those changes.