

## **RCI U.S. SAFE HARBOR CUSTOMER AND SUPPLIER PRIVACY NOTICE**

### **RCI, LLC**

#### **Introduction.**

RCI, LLC (referred to as “we,” “us,” or “our”) believes in protecting your privacy.

We have created this RCI U.S. Safe Harbor Customer Privacy Notice (“Safe Harbor Notice”) to help you learn about how we handle customer and supplier Personal Information collected by our affiliates located in the European Economic area (the “EEA”) and Switzerland and transferred to us in the United States. This Safe Harbor Notice supplements our customer privacy policy available at [http://www.rci.com/docs/KnowledgeBase/Documents/en\\_US/Privacy.pdf](http://www.rci.com/docs/KnowledgeBase/Documents/en_US/Privacy.pdf). Unless specifically defined in this policy, the terms in this Safe Harbor Notice have the same meaning as in our customer privacy policy.

We have subscribed to and will adhere to the U.S.-EU and U.S.-Swiss Safe Harbor programs (“Safe Harbor Programs”) by adopting and implementing the Safe Harbor Privacy Principles, which include a set of frequently asked questions (collectively, the “Principles”). More information about the Safe Harbor Programs can be found at <http://www.export.gov/safeharbor/>. This Policy applies to RCI, LLC in the United States.

When we use the term “Personal Information” in this Safe Harbor Notice, we are referring to any information that (i) is recorded in any form; (ii) is about or is related to a specific individual; (iii) can be linked to that individual; and (iv) is transferred by our affiliates in the EEA and Switzerland to the U.S.

When we use the term “Sensitive Personal Information” in this Notice, we are referring to a particular subset of an individual’s Personal Information that provides details of his or her race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns his or her health.

Our general practices for implementing the Principles with respect to the Personal Information we receive from the EEA and Switzerland are described below.

#### **1. Notice.**

##### **Customer Information:**

We may receive information from entities in the EEA and Switzerland including: name, contact information and communication preferences, member number and account information, new or historical resort or travel reservation or related information, payment-related information and other types of information individuals choose to provide (collectively, “Personal Information”).

Any Personal Information sent to us may be used by us and our agents for the following purposes: to provide the services or transactions you have requested; for internal quality assurance purposes; to improve our products, services or infrastructure; to send you

administrative communications, notifications, marketing or promotions; to communicate or conduct surveys, questionnaires, contests or promotions.

**Supplier Information:**

We may receive supplier Personal Information from entities in the EEA and Switzerland including: name, business title, business address and other business contact information, financial account or tax identification information, payment-related information, service or relationship status information and other types of information individuals choose to provide (collectively, "Personal Information").

Any supplier Personal Information sent to us may be used by us and our agents for the following purposes: to manage supplier relationships; process payments to suppliers or perform related accounting or recordkeeping functions; or for internal quality assurance purposes.

Access to customer or supplier Personal Information is limited to those persons who must use the information in order to carry out the above purposes.

**2. Choice.** If we intend to use your information for a purpose that is incompatible with these purposes or if we intend to disclose it to a type of third party (other than an agent or service provider) not previously identified, we will notify you and offer you the opportunity to opt out of such uses and/or disclosures where it involves non-sensitive information or opt-in where sensitive information is involved.

**3. Onward Transfers (Transfer to Third Parties).** We will provide you with notice and choice if we intend to transfer your Personal Information to a type of third party that is not acting as our agent or service provider and that we have not previously identified. We sometimes contract with other companies and individuals to perform functions or services on our behalf. They may have access to Personal Information needed to perform their functions, but are restricted from using the Personal Information for purposes other than providing services for us or to us. We enter into written agreements with agents and service providers that have access to Personal Information received from the EEA and Switzerland that require them to provide at least the same level of privacy protection as required by the relevant Safe Harbor Principles.

**4. Data Security.** We will take reasonable steps to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have implemented appropriate physical, electronic and managerial procedures to help safeguard and secure Personal Information from loss, misuse, unauthorized access or disclosure, alteration or destruction.

**5. Data Integrity.** We will process Personal Information in a manner that is compatible with and relevant to the purpose for which it was collected or authorized by you. To the extent necessary for those purposes, we will take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

**6. Access.** Upon request, we will provide you with reasonable access to the Personal Information about you that we hold. We will also take reasonable steps to correct, update, amend or delete any information that is demonstrated to be inaccurate, except where the burden or expense of doing so would be disproportionate to the risks to your privacy in the case in question or where the rights of third parties would be violated.

**7. Enforcement.** We will regularly review our compliance with the statements set forth in this Notice, and we will provide an independent way to resolve complaints about our privacy practices. We encourage interested persons to Contact Us (contact information provided below) and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

We also participate in the International Centre for Dispute Resolution (“ICDR”), a division of the American Arbitration Association’s ([www.adr.org](http://www.adr.org)), Dispute Resolution Process. If your inquiry is not satisfactorily addressed by us, you may contact the ICDR.

### **Modifications.**

We may amend this Notice from time-to-time consistent with the requirements of the U.S.–EU Safe Harbor Framework and the U.S.–Swiss Safe Harbor Framework. The most recent version of the Notice will always be posted to this website. Anytime that we do make such changes, we will also update the Effective Date listed at the beginning of the Notice. Please be sure to review the most recent version of the Notice each time that you visit this website so that you are aware of how we collect, use and retain personal information. Any changes to our Policy will become effective upon our posting of the revised Policy on the Site.

### **Contact Us.**

To understand more about the transfer of your Personal Information from the EU or Switzerland to the US, access your information, ask questions about our privacy practices or issue a complaint, please contact us at:

RCI, LLC

Address: 9998 North Michigan Road, Carmel, IN 46032

Attn: Customer Service – Privacy

Phone: RCI Weeks: 1-317-805-8000 or 1-800-338-7777

RCI Points: 1-317-805-9941 or 1-877-968-7476

Email: [feedback@rci.com](mailto:feedback@rci.com)

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