

Revised 8/1/2016

## **BGV ONLINE PRIVACY POLICY**

Breckenridge Grand Vacations (“BGV”) is committed to protecting the privacy of our online visitors. This privacy policy has been compiled to better serve those who are concerned with how their 'Personally Identifiable Information' (PII) is being used online. PII, as described in US privacy law and information security, is information that can be used on its own or with other information to identify, contact, or locate a single person, or to identify an individual in context. Please read our privacy policy carefully to get a clear understanding of how we collect, use, protect or otherwise handle your Personally Identifiable Information in accordance with our website. This document sets forth the online privacy policy of Breckenridge Grand Vacations, its subsidiaries and affiliates (collectively “BGV”) for users of [www.breckenridgegrandvacations.com](http://www.breckenridgegrandvacations.com), [www.goldpoint.com](http://www.goldpoint.com), [www.grandtimber.com](http://www.grandtimber.com), [www.grandlodgeonpeak7.com](http://www.grandlodgeonpeak7.com), [www.gl7owners.com](http://www.gl7owners.com) and [www.breckenridgediscountlodging.com](http://www.breckenridgediscountlodging.com) (the “Site” or “Sites”).

**IF YOU HAVE OBJECTIONS TO THE PRIVACY POLICY, YOU SHOULD NOT USE THIS SITE. THIS PRIVACY POLICY DOES NOT GOVERN PRIVACY PRACTICES ASSOCIATED WITH OFFLINE ACTIVITIES.**

### **Information Usage and Sharing**

BGV values your patronage and respects your right to privacy. Because we are committed to protecting your privacy, personal data relating to an identified or identifiable individual that is submitted through our web page will be collected, processed, stored, and disposed of in accordance with applicable federal law of the United States and the laws of the State of Colorado that may apply. The submission of personal data constitutes the user’s acknowledgement that he/she has read and understood this notice, and agrees to its terms. In order to facilitate the purchase of goods online or to update visitors of new products or services, BGV may share certain individual information with its partners, related or affiliated companies or third parties. BGV will act on the advice of counsel should its records be subpoenaed. In connection with any contest or promotion, BGV reserves the right to post all information regarding contest and promotion winners that may be legally required or as is otherwise disclosed in the contest rules. We may use the information we collect from you when you register, make a purchase, sign up for our newsletter, respond to a survey or marketing communication, surf the website, or utilize certain other site features.

### **Security**

BGV takes your information security very seriously. As such, we have generally accepted security measures in place to protect against the loss or misuse of any electronic information we may collect. Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible. We use regular Malware Scanning. Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology. We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information. All transactions are processed through a gateway provider and are not stored or processed on our servers.

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### **Information Collection**

In a few areas on our Site, we ask you to provide information that will enable us to enhance your site visit, process your request correctly, and if necessary, follow up with you before or after your visit.

Owners of BGV properties may, at their choice, provide personal account information online to maintain updated personal contact or preference information.

From time to time we may ask questions, or we may use data collected for order processing, to better understand our customers' preferences. This information allows us to improve our services, and to offer you specially tailored deals when appropriate. We will request information from you when you:

1. Plan a trip to Breckenridge.
2. Place a request with a BGV property.
3. Provide feedback in an online survey.
4. Participate in a sweepstakes or other promotional offer.
5. Subscribe to a newsletter or a mailing list.

If you don't want to receive promotional material or special offers from us, we ask that you opt out where indicated. Please note that in the case of newsletters or mailing lists, you will be able to "unsubscribe" to these mailings at any time.

### **Information Use**

Certain information obtained by BGV will be used for different purposes. Some personal information is required to process your request. We may also use personal account information to generate statistics and aggregate reports for internal use. Aggregate information may be used to design programs and promotions that we think would be of interest to an identified group of customers. In addition, we may use the detailed profiles in order to target special offers and promotions more effectively.

This Site does not collect personally identifiable information from your computer when you browse and request pages from our servers. This means that, unless you voluntarily and knowingly provide us with personally identifiable information, we will not know your name, your email address, or any other personally identifiable information.

BGV may collect non-personal information from our online visitors, such as the visitor's type of browser, page hits, number of visits, web pages viewed, operating system and domain names, and may use cookies to obtain other non-personal information. Cookies are pieces of data sent from a web server to a web browser that enables a web server to identify users that visit a site hosted by that server. Our Sites may use cookies in order to identify you to our Site so that we can provide more customized information and services to you. In general, if you choose, you can disable the use of cookies by reviewing your browser's performance and options. The non-personal information we collect enables us to track the total number of visitors to each of our sites in an aggregate form, and may be used by BGV to improve and update our sites, products and services. Aggregate (non-personal) information may be shared with third parties. By using the Sites, you grant BGV a perpetual, irrevocable, worldwide, royalty-free, sub licensable (through multiple users) license to use, reproduce, store, modify, publicly perform, publicly display, distribute and transmit such non-personal information for any purpose, and waive any moral rights and publicity rights in such non-personal information. BGV does not tie this non-personal information to your personal information.

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## **THIRD PARTY ACCESS TO INFORMATION**

### **Access and use by third party service providers**

From time to time, BGV enters into arrangements with companies whose expertise is essential for our own services to function properly. For example, in accordance with standard industry practice, and as allowed under federal and state law, we work with specialized firms that service our loans, provide escrow services, process collections or provide certain owner demographics. As permitted by law, we disclose to these service providers only such nonpublic personal information of the type described above as is reasonably necessary to perform these functions. As with all of our business partners, these companies are required to safeguard your information and use it only for authorized purposes.

### **Access and use by joint marketing partners**

BGV enters into joint marketing arrangements with carefully selected business partners to provide our owners with specialized products and services. Although these partners are not owned by or affiliated with BGV, they work closely with us to meet your needs. If appropriate, we may disclose to these marketing partners the nonpublic personal information about you described above; however, we do not share your account number, owner number, contract number, social security number, any access codes or credit information with nonaffiliated third parties. Our partners must agree to safeguard fully the confidentiality of owner information, and they are not allowed to disclose such information to anyone else without our permission.

### **Access by other nonaffiliated third party companies**

We may, in the future, share your nonpublic personal information with nonaffiliated third party companies other than those described above. You may choose not to have your information disclosed to these companies (see opt out instructions below).

BGV reserves the right to cooperate with local, provincial, federal, and international officials in any investigation requiring either personal information (including any information provided on-line through any of the BGV Sites noted above) or reports about lawful or unlawful user activity on this site. BGV also reserves the right to disclose any information in an individual's account to satisfy any law, regulation, or government request or protect the rights or property of Gold Point Lodging and Realty, Inc. or Peak 7, LLC.

## **Google**

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. [Google AdWords policy](#). We use Google AdSense Advertising on our website. Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy.

We have implemented the following:

- Remarketing with Google AdSense
- Google Analytics

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We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

Opting out:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

### **Fair Information Practices**

The Fair Information Practices Principles form the backbone of privacy law in the United States and the concepts they include have played a significant role in the development of data protection laws around the globe. Understanding the Fair Information Practice Principles and how they should be implemented is critical to comply with the various privacy laws that protect personal information.

In order to be in line with Fair Information Practices we will take the following responsive action, should a data breach occur:

We will notify you via email

- Within 7 business days

We also agree to the Individual Redress Principle which requires that individuals have the right to legally pursue enforceable rights against data collectors and processors who fail to adhere to the law. This principle requires not only that individuals have enforceable rights against data users, but also that individuals have recourse to courts or government agencies to investigate and/or prosecute non-compliance by data processors.

### **CAN SPAM Act**

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out penalties for violations.

We collect your email address in order to:

- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with CANSPAM, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

If at any time you would like to unsubscribe from receiving future emails, you can email us at:

[mktgadmin@breckgv.com](mailto:mktgadmin@breckgv.com)

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- As well as follow the instructions at the bottom of each email and we will promptly remove you from ALL correspondence.

### **Children's Privacy**

BGV does not knowingly solicit data from, or about, people under the age of 25 years for the purposes of selling directly to these individuals. Note: BGV assumes that visitors to our site are adults. We do not require any visitor to provide date of birth at registration, though we do ask for an age when applicable for enter-to-win promotions. U.S. federal law prohibits discrimination in public accommodations based on age, so when we send out information on lodging bookings we are required to treat all site members equally, regardless of age. We will send real estate offers only to customers 21 years old and older.

### **Other Sites**

This Site and the other Sites contain links to select third party sites that may be of interest to you (e.g., events, mortgage servicers). BGV is only responsible for the privacy statement and content of this Site and affiliated Sites. We are not responsible for the privacy practices or the use of cookies on non-BGV Sites that you have accessed prior to or after visiting this Site.

### **Policy Changes**

As our web sites grow and new features are added or as legal requirements change, our online privacy policy may be modified. All information submitted to BGV is subject to the terms and conditions of this policy and any modifications. If you have any questions about our online privacy statement, the practices of our web site, or your dealings with our web site, please contact us at Breckenridge Grand Vacations, PO Box 6879, Breckenridge, Colorado 80424.

### **Legal Liability**

Under no circumstances, including, but not limited to, negligence, shall BGV be liable for any direct, indirect, special, incidental or consequential damages, including, but not limited to, loss of data or profit, arising out of the use, or the inability to use, the materials on this site, even if BGV has been advised of the possibility of such damages.