## Last updated March 5, 2019

ADVENTURE ENGINE INC. respects the privacy of all of its users and is committed to protecting such privacy in accordance with this Privacy Policy. This Privacy Policy explains AdventureEngine Inc.'s ("AEI") treatment of your personally identifiable information collected in connection with your activities on or related to all AEI Web Sites referencing this Privacy Policy (the "AEI Sites") and all services made available on the AEI Sites (collectively, unless noted otherwise, the "AEI Services"). This Privacy Policy also explains how you can ask questions and make suggestions about our privacy practices and review and update your personal information.

We urge you to read this Privacy Policy carefully and to check back periodically as this Privacy Policy may change form time to time. Please note that this Privacy Policy does not apply to the practices of companies or Web Sites which are not owned or controlled by AEI.

## 1. Information Collected

In the course of operating the AEI Services, we may collect two types of information about our users: Personal Information and Non-Personal Information.

1. "Personal Information" is personally identifiable information, such as your name, address, e-mail address, birth date and gender. Personal Information is collected by us when you choose to provide it to us when registering for an AEI Service, such as when you choose to subscribe to an AEI Service, enter an AEI promotion or choose to receive an AEI newsletter. We may also receive Personal Information from our business partners and other third parties, provided that such third parties confirm to us that you have permitted them to share such information.

Business contact information such as the name, title, business address, e-mail address or telephone number of a business or professional person or an employee of an organization is not considered Personal Information.

2. "Non-Personal Information" is information of an anonymous nature, such as an Internet Protocol Address ("IP Address"), the domain used to access an AEI Service, and the type and version of browser or operating system being used. Aggregate information, such as demographic statistics of our users (e.g., average age or geographical allocation of our users), number of visitors and average time spent on an AEI Service, is also considered Non-Personal Information.

Non-Personal Information is collected or derived by us in the course of operating the AEI Services. For example, our Web servers may automatically collect Non-Personal Information which is provided through your browser or stored on a Cookie ? or through a Web Beacon ? when you choose to visit an AEI Service. Non-Personal Information is used by AEI as described here.

3. to remove tours you wish to discontinue from being listed on the Adventure Engine web site.

- 4. to process any cancellations by customers, manage and update any trip cancellations and provide refunds to your customers.
- 5. to provide accurate company information including commissions you are willing to pay resellers such as travel agents. These funds will be deducted from your gross trip revenue and paid automatically to resellers and agents by the Adventure Engine system.
- 6. to complete the upload of company information and inventory in a timely manner partial uploads will receive warnings from the Adventure Engine system administration and will be removed if upload has not been completed within 72 hours of the issuance by us of a warning.

# 2. Use of Personal Information

Personal Information may be used by us for the following purposes:

- Providing you with the AEI Services and information you have requested from us, including your use of the AEI Sites. We may from time to time use your Personal Information to contact you about changes, enhancements or similar notices related to the AEI Services;
- 2. If you indicated that you were interested in receiving offers or information from AEI or certain of our selected sponsors or advertisers, AEI or such sponsors or advertisers may send you e-mail materials and other mailings about products and services that we feel may be of interest to you. If at any time you would like to end your subscription to any such e-mail materials, follow the directions posted at the bottom of the e-mail material;
- 3. If you enter a contest or other promotion offered on an AEI Site, we may, under the rules of the promotion, use your name and certain other information to administer the promotion, such as contacting, announcing and promoting the winners of the promotion;
- 4. AEI may also use Personal Information if it has reasonable grounds to believe the information could be useful when investigating a contravention of a federal, provincial or foreign law or in order to protect or defend a legal interest.
- 3. Disclosure of Personal Information

We will not sell or rent your Personal Information to anyone. We will only disclose your Personal Information to third parties:

- 1. Where you have specifically given us your consent to disclose your Personal Information for a designated purpose;
- 2. Who are acting on our behalf as our agents, suppliers or service providers, solely to enable us to more efficiently provide you with the AEI Services. Such entities act under strict contractual controls, requiring them to maintain the confidentiality of all such Personal Information and to use such information solely for purposes related to the provision of the AEI Services;
- 3. As may be set out in the Terms and Conditions applicable to an AEI Service, to facilitate the provision of such AEI Service, such as fulfilling legal requirements;

- 4. As required by law, including by an order of any court, institution or body with jurisdiction or authority to compel the production of information, or in order to protect or defend a legal interest; or
- 5. In connection with an AEI corporate re-organization, merger or amalgamation with another entity, or a sale of all or a substantial portion of the assets of AEI provided that the Personal Information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.
- 4. Links to Other Sites and Advertisements
  - 1. AEI's Services contain links to other Web Sites and services. While we try to link only to sites and services that share our high standards and respect for privacy, please understand that we are not responsible for the content of, or the privacy practices employed by, other companies or Web Sites. This Privacy Policy applies only to the AEI Services referencing this Privacy Policy. Please take the time to review the privacy policies contained on the linked Web Sites before sharing your personal information with such those sites.
  - 2. The majority of the advertisements which are displayed in connection with the AEI Services are served through a reputable third party advertisement serving partner. If you would like to know more about what Non-Personal Information is collected and how information is used by our partner or about its "opt-out" procedures, please click here ?

#### 5. Security

- 1. The security of your Personal Information is important to us. AEI takes technical, contractual, administrative, and physical security steps to protect Personal Information that you provide to us. We instruct our employees with access to your Personal Information that it is to be used only in adherence with the principles set forth in this Privacy Policy and the laws applicable to each specific business.
- 2. In certain areas, such as when you provide credit card information to us, we work to help protect the security of your credit card information during transmission by using industry standard Secure Sockets Layer ("SSL") encryption technology.
- 3. You can help protect the security of your Personal Information as well. For instance, never give out your password, since this is what is used to access your Account or Registration Information. Also remember to log out of your account and close your browser window when you finish using an AEI Service or surfing the Web, so that other people using the same computer won't have access to your information.
- 6. Changes to this Privacy Policy

AEI may from time to time change its Privacy Policy as new AEI Services are added or old ones changed. Changes will be effective when notice of such change is posted at an AEI Site. Please check this Privacy Policy regularly for updates by checking the date of "Last Update" at the top of this document.

### 7. Additional Privacy Procedures

Privacy procedures specific to an AEI Service can be found on an AEI Site at the location of the particular AEI Service, or in additional terms referenced at such AEI Site. Those procedures are an addendum to this policy, and are provided to you at the place where they will be of most use and relevance to you.

8. Accessing and Changing Account/Registration Information

- 1. AEI provides you with the means to access, update, edit or delete any Account or Registration Information you may have provided to us at any time on your own by going to the appropriate page in the Account or Registration section of the relevant AEI Service, and changing or deleting such information as desired.
- 2. If you are unsure whether we have a record containing any of your Personal Information and would like to confirm whether or not we do, please send an e-mail to our Privacy Manager at ?, indicating all e-mail addresses that you may have given us.
- 3. If you decide at any time that you do not want to receive any e-mail materials to which you have subscribed, you may choose to unsubscribe to these e-mails by following the instructions at the bottom of the e-mail material.
- 9. Questions, Comments or Suggestions

If you have questions, comments, complaints or suggestions about this Privacy Policy or AEI's privacy practices that were not answered here, send our Privacy Manager an e-mail at info@adventureengine.com