

Privacy Notice – “Guides”

Version Release Date: June 7, 2018

Notice Version: 1.0

Data Controller Contact Information

THE APPROACH, INC.

1309 Sturgus Ave S.
Seattle, WA 98144

info@findtheapproach.com

This **Privacy Notice** governs the privacy policy of our Services (as defined in the most current version of the **Terms of Service**).

Our privacy notice tells you what personal data and non-personal data we may collect from you, how we collect it, how we protect it, how we may share it, how you can access and change it, and how you can limit our sharing of it. Our privacy notice also explains certain legal rights that you have with respect to your personal data. Any capitalized terms not defined herein will have the same meaning as where they are defined elsewhere on our Services.

Definitions

“**Non-Personal Data**” is all information that is not Personal Data.

“**Personal Data**” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Personal Data is in many ways the same as Personally Identifiable Information (PII). However, Personal Data is broader in scope and covers more data.

A “**User**” is someone who uses or accesses the Services.

Topics Covered in Our Privacy Notice

Information We Collect

Our Use of Cookies

How Your Information Is Used

Retaining and Destroying Your Personal Data

Updating Your Personal Data

Revoking Your Consent for Using Your Personal Data

Protecting the Rights of Third Parties

Links to Other Websites

Protecting Children’s Privacy

Users that are Resident in the European Economic Area
Our Email Policy
Our Security Policy
Changes to Our Privacy Notice

Information We Collect

Generally, you control the amount and type of information that you provide to us when using the Services. A detailed list of the Personal Data we collect is included in **Appendix 1**.

What Happens if you Don't Give Us Your Personal Data If you do not provide us with the requested Personal Data, we may not be able to provide you with all the features of the Services.

We collect your Personal Data in the following ways:

Automatic Information

We automatically receive information from your device. This may include information such as your IP address, the type of device, and data about your activity when using the Services.

Account Creation and Online Forms

We collect Personal Data when you create an account or enter information into an online form on the Services. Our Services may use online forms to assist with payment processing and the creation of a User profile.

Information Specifically Requested

We may specifically request information and documents such as references and certificates, which may contain Personal Data.

Collecting Your Location Information

When you use our Services, we may collect and process information about your actual physical location. We use several technologies, like GPS and IP tracking, to determine your location.

Our Use of Cookies

Our Services use cookies. A cookie is a small piece of data or a text file that is downloaded to your computer or mobile device when you access certain websites or services. Cookies may contain text that can be read by the web server that delivered the cookie to you. The text contained in the cookie generally consists of a sequence of letters and numbers that uniquely identify your computer or mobile device.

By agreeing to accept our use of cookies, you are giving us, and third parties we partner with, permission to place, store, and access some or all of these cookies on your mobile or other device.

We may use cookies for:

- Identifying the areas of our Services that you have visited
- Personalizing content that you see on our Services
- Our Services analytics
- Remarketing our products or services to you

- Remembering your preferences, settings, and login details
- Targeted advertising and serving ads relevant to your interests

Most browsers can be set to disable the use of cookies. However, if you disable cookies, you may not be able to access features on our Services correctly or at all.

How Your Information Is Used

We use the information we receive from you to:

- Provide the Services and enable you to organize, market and arrange travel and trips
- Personalize and customize our content
- Analyze trends and make improvements to our Services
- Contact you with updates to our Services
- Resolve problems and disputes
- Contact you with marketing and advertising that we believe may be of interest to you

Communications and Emails

When we communicate with you about our Services, we will use the email address you provided to us as a User (if you provided us with one). We may also send you emails with promotional information about our Services or offers from us unless you have opted out of receiving such information.

Sharing Information with Third Parties

We do not sell or rent your Personal Data to third parties for marketing purposes. However, for data aggregation purposes we may use your Non-Personal Data, which might be sold to other parties at our discretion. Any such data aggregation would not contain any of your Personal Data. We may provide your Personal Data to third-party service providers we hire to provide services to us. These third-party service providers may include but are not limited to: web analytics companies, payment processors, advertising networks, call centers, data management services help desk providers, accountants, law firms, auditors and email service providers.

Legally Required Releases of Information

We may be legally required to disclose your Personal Data if such disclosure is (a) required by subpoena, law, or another legal process; (b) necessary to assist law enforcement officials or government enforcement agencies; (c) necessary to investigate violations of or otherwise enforce any binding legal agreements between you and us; (d) necessary to protect us from legal action or claims from third parties, including you and/or other Users; or (e) necessary to protect the legal rights, personal/real property, or personal safety of our company, Users, employees or third parties.

Disclosures to Successors

If our business is sold or merges in whole or in part with another business that would become responsible for providing the Services to you, we retain the right to transfer your Personal Data to the new business. The new business would retain the right to use your Personal Data according to the terms of this privacy notice as well as to any changes to this privacy notice as instituted by the

new business. We also retain the right to transfer your Personal Data if our company files for bankruptcy and some or all of our assets are sold to another individual or business.

Retaining and Destroying Your Personal Data

We retain information that we collect from you (including your Personal Data) only for as long as we need it for legal, business, or tax purposes. Your information may be retained in electronic form, paper form, or a combination of both. When your information is no longer needed, we will destroy, delete, or erase it.

Updating Your Personal Data

You can update your Personal Data using services found on our Services. If no such services exist, you can contact us using the contact information found at the top of this notice and we will help you. However, we may keep your Personal Data as needed to enforce our agreements and to comply with any legal obligations.

Revoking Your Consent for Using Your Personal Data

You have the right to revoke your consent for us to use your Personal Data at any time. Such an opt out will not affect disclosures otherwise permitted by law including but not limited to: (i) disclosures to business partners, (ii) disclosures to third-party service providers that provide certain services for our business, such as credit card processing, computer system services, data management services, (iii) disclosures to third parties as necessary to fulfill your requests, (iv) disclosures to governmental agencies or law enforcement departments, or as otherwise required to be made under applicable law, (v) previously completed disclosures to third parties, or (vi) disclosures to third parties in connection with subsequent contests or promotions you may choose to enter, or third-party offers you may choose to accept. If you want to revoke your consent for us to use your Personal Data, send us an email with your request to: info@findtheapproach.com.

Protecting the Rights of Third Parties

If any postings you make, or listings you upload on our Services contain information about third parties, you must make sure you have permission to include that information in your posting. While we are not legally liable for the actions of our Users, we will remove any postings or listings about which we are notified, if such postings or listings violate the privacy or intellectual property rights of others.

Links to Other Websites

Our Services may contain links to other websites. These websites are not under our control and are not subject to our privacy notice. These websites will likely have their own privacy notices. We have no responsibility for these websites and we provide links to these websites solely for your convenience. You acknowledge that your use of and access to these websites and applications are solely at your risk. It is your responsibility to check the privacy notices of these websites and applications to see how they treat your Personal Data.

Protecting Children's Privacy

Even though our Service is not designed for use by anyone under the age of 18, we realize that an individual under the age of 18 may attempt to access our Services. We do not knowingly collect Personal Data from children under the age of 18. If you are a parent or guardian and believe that your child is using our Services, please contact us. Before we remove any information, we may ask

for proof of identification to prevent malicious removal of account information. If we discover that a child is accessing our Services, we will delete his/her information within a reasonable period of time. You acknowledge that we do not verify the age of our Users nor do we have any obligation to do so.

Users that are Resident in the European Economic Area

If you are resident in the European Economic Area, you have the right to:

- (1) Access Personal Data we hold about you;
- (2) Ask that your Personal Data be corrected, updated, or deleted;
- (3) Object to processing of your Personal Data for the purpose of direct marketing; and
- (4) Object to processing based on the legitimate interests basis described below on grounds relating to your particular situation.

If you would like to exercise any of these rights, please contact us through the contact information above.

If you are resident in the European Economic Area please note that we rely on the following *legal bases* to use your Personal Data:

- (1) **Where it is needed to provide you with the Services**, such as:
 - To enable you to organize, market and arrange travel and trips; and
 - To resolve problems and disputes.
- (2) **Where it is in our legitimate interests to do so**, such as:
 - To personalize and customize our content;
 - Analyze trends and make improvements to our Services;
 - Contact you with updates to our Services;
 - For some direct marketing communications; and
 - For some profiling and other automated decision making.
- (3) **With your consent or explicit consent**:
 - For some direct marketing communications; and
 - For some profiling and other automated decision making.

Additionally, please note that your information will be transferred outside of Europe, including to the United States.

Our Email Policy

You can always opt out of receiving further email correspondence from us. We will not sell, rent, or trade your email address to any unaffiliated third party without your permission except in the sale or transfer of our business, or if our company files for bankruptcy.

Our Security Policy

We have built our Services using industry-standard security measures and authentication tools to help protect the security of your Personal Data. Unfortunately, we cannot guarantee against the loss or misuse of your Personal Data or secure data transmission over the Internet because of its nature.

Changes to Our Privacy Notice

We reserve the right to change this privacy notice at any time. If our company decides to change this privacy notice, we will post those changes on our Services so that our Users are always aware of what information we collect, use, and disclose. If at any time, we decide to disclose or use your Personal Data in a method different from that specified at the time it was collected, we will provide advance notice by email sent to the email address you provided to us. Otherwise, we will use and disclose our Users' Personal Data in agreement with the privacy notice in effect when the information was collected. In all cases, your continued use of the Services after any change to this privacy notice will constitute your acceptance of such change.

Questions About Our Privacy Notice

If you have any questions about our privacy notice, please contact us using the information at the top of this privacy notice.

Appendix 1 – Data Collected

Data	Usage
Name	Account information
Postal Address	Profile information
Email Address	Account information
Phone Number	Profile information
Date of birth	Account information
Profile picture	Profile information
Location	Profile information
Personal description	Profile information
Credit card information	Payment processing
Bank account information	Payment processing
Device	Device information
IP Address	Geo-location
Mobile GPS coordinates	Geo-location
Site visit dates	Log data
Time spent on site	Log data
Cookie data	Log data
Site interactions - including clicks, searches, page viewed	Log data
Facebook information	Third-party services
Google information	Third-party services
Pixel tag	Log data
Other information - search queries, survey data, reviews, use of promotions	Log data

Trip information	Log data
References	Guide vetting