GUESTBOOK REWARDS, INC.

Privacy Policy

Welcome to Guestbook Rewards, Inc. the online and mobile service of Guestbook Rewards, Inc. ("The Guestbook," "we," or "us"). Our Privacy Policy explains how we collect, use, disclose, and protect information that applies to our Service, and your choices about the collection and use of your information.

The Guestbook complies with the EU-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. The Guestbook has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit https://www.privacyshield.gov/ .

The Guestbook complies with the US-Swiss Safe Harbor Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from Switzerland. The Guestbook has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. If there is any conflict between the policies in this privacy policy and the Safe Harbor Privacy Principles, the Safe Harbor Privacy Principles shall govern. To learn more about the US-Swiss Safe Harbor and to view our certification page, please visit http://www.export.gov/safeharbor/ .

Click on the links below to jump to each section:

1. How We Collect and Use Information
2. Sharing of Your Information
3. How We Store and Protect Your Information
4. Your Choices about Your Information
5. Children's Privacy
6. Links to Other Websites and Services
7. How to Contact Us
8. Changes to Our Privacy Policy

1. HOW WE COLLECT AND USE INFORMATION

Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Use at https://theguestbook.com/assets/terms.pdf.

We collect the following types of information about you:

Information you provide us directly: When you register for a The Guestbook account, we ask for your e-mail address and ask that you create a password. Alternatively, you may register using a third-party service for authentication, such as Gmail, Yahoo, Outlook, and Hotmail (see "Information we may receive from third parties" below). Once you are registered, we allow you to provide us with additional information such as your first and last name, address, hotel preferences, birthdate (month and day), phone number and additional e-mail addresses. We may retain any messages you send through the Service, and may collect information you provide in any content you provide to the Service. We use this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages and push notifications. We may send you emails containing newsletters, promotions and special offers. If you do not want to receive such email messages, you will be given the option to opt out or change your preferences. We also use your information to send you Service-related emails (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the Service, technical and security notices). You may not opt out of Service-related e-mails. If you choose to make a reservation with a Participating Property through The Guestbook's website, you may provide credit card and other information associated with such reservations. The requisite information will be passed through to the Participating Properties to fulfill its reservation requirements, however, credit card information will never be seen nor stored by The Guestbook (see also "Sharing of your Information").

Information we may receive from syncing your e-mail account: If you enable e-mail sync for your e-mail account(s) in order to automate various functions of the Service, The Guestbook will utilize standard secure protocols, such as OAuth, to authorize access. The respective email service will seek permission for the functions requested by The Guestbook, which you will then authorize. Despite the access level granted via this process, The Guestbook commits to limit the sync process to "view" rights and will only access e-mails for the purpose of collecting information about hotel/travel reservations & billing in order to operate, maintain and provide our Service. You may cancel this integration at any time via the respective third-party email service. See Your Choices, below, or visit My Account on our website to learn more.

Information we may receive from third parties: We may receive information about you from third parties. For example, if you access our websites or Service through a third-party connection or log-in such as Facebook, by "following," or "liking," us on social media, adding The Guestbook application, or linking your social media account to The Guestbook Service, etc., that third party may pass certain information about your use of its service to The Guestbook. This information could include, but is not limited to, the user ID associated with your account (for example, your Facebook UID), an access token necessary to access that service, any information that you have permitted the third party to share with us, and any information you have made public in connection with

that service. If you allow us access to your friends list, your friends' user IDs, and your connection to those friends, may be used and stored to make your experience more social, and to allow you to invite your friends to use our Service as well as provide you with updates if and when your friends join The Guestbook. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to The Guestbook Service. You may also unlink your third party account from the Service by adjusting your settings on the third party service.

Information automatically collected. We automatically collect certain types of usage information when you visit our website or use our Service. When you visit the Service, we may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets The Guestbook help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click and other actions you take on the Service), and allow us or our business partners to track your usage of the Service over time. You can set your web browser to refuse all cookies or to indicate when a cookie is being sent. However, some features of the Service may not function properly if the ability to accept cookies is disabled. We also may collect log file information from your browser or mobile device each time you access the Service. Log file information may include anonymous information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on the Service, domain names, landing pages, pages viewed, and other such information. We may employ clear gifs (also known as web beacons), which are used to anonymously track the online usage patterns of our Users. In addition, we may also use clear gifs in HTML-based emails sent to our users to track, which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service. We may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. These tools collect information sent by your browser or mobile device, including the pages you visit and other information that assists us in improving the Service. Although we do our best to honor the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser at this time.

When you access the Service by or through a mobile device (including but not limited to smart-phones or tablets), we may access, collect, monitor and/or remotely store one or more unique identification numbers associated with your device ("Device ID"), and/or information about your mobile carrier, device type and manufacturer, phone number, and depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your device. Location data may convey to us information about how you browse and use the Service.

We use or may use cookies, log file, device identifiers, location data and clear gifs information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including advertising; (c) to provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (e) diagnose or fix technology problems; (f) help you efficiently

access your information after you sign in; and (g) automatically update The Guestbook application on your mobile devices.

2. SHARING OF YOUR INFORMATION

We may share your personal information in the instances described below. For further information on your choices regarding your information, see "Your Choices About Your Information," below. We may share your personal information with:

- Third parties in order to provide the Service to you. For example, if you choose to make a direct reservation with a Participating Property through The Guestbook's website, credit card and other information associated with such reservations may be passed through to the Participating Property to fulfill its reservation requirements but credit card information specifically will never be seen nor stored by The Guestbook;

- Third party vendors, consultants and other service providers that perform services on our behalf, in order to carry out their work for us, which may include content or service fulfillment, billing, or providing analytics services;

- Our business partners who are members of The Guestbook program, in order to provide services to you;

- With your consent, we may share with third parties who we think offer you products or services you may enjoy;

- Third parties and the public at your request. Any information or content that you voluntarily disclose for posting to the Service may become available to the public, as controlled by any applicable posting settings, which may be changed before each posting. Subject to your posting settings, any content that you make public is searchable by other Users. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users have copied or saved that information

- Other parties in connection with any company transaction, such as a merger, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party or in the event of bankruptcy or related or similar proceedings; and

- Third parties, if we have a good faith belief that such sharing is required to (i) satisfy any applicable law, regulation, subpoena/court order, legal process or other government request, (ii) enforce our Terms of Use Agreement, including the investigation of potential violations thereof, (iii) investigate and defend ourselves against any third party claims or allegations, or (iv) protect against harm to the rights, property or safety of The Guestbook, its users or the public as required or permitted by law. Please note that The Guestbook is obliged to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement needs.

We may also share information with others in an aggregated and anonymous form that does not reasonably identify you directly as an individual. The Guestbook may be liable for appropriate onward transfers of personal data to third parties.

3. HOW WE STORE AND PROTECT YOUR INFORMATION

Storage and Processing: Your information collected through the Service may be stored and processed in the United States or any other country in which The Guestbook or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which The Guestbook or its parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

Keeping your information safe: The Guestbook cares about the security of your information, and uses commercially reasonable safeguards to preserve the integrity and security of all information collected through the Service. To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from The Guestbook, at all times. However, The Guestbook cannot ensure or warrant the security of any information you transmit to The Guestbook or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed. Your privacy settings may also be affected by changes to the functionality of third party sites and services that you add to The Guestbook Service, such as social networks. The Guestbook is not responsible for the functionality or security measures of any third party.

Compromise of information: In the event that any information under our control is compromised as a result of a breach of security, The Guestbook will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

4. YOUR CHOICES ABOUT YOUR INFORMATION

You control your account information and settings: You may update your account information and email-communication preferences at any time by logging into your account and changing your My Account settings.

Communications: You can also stop receiving promotional email communications from us by clicking on the "unsubscribe link" provided in such communications. We make every effort to promptly process all unsubscribe requests. As noted above, you may not opt out of Service-related communications (e.g., account verification, and reminders, changes/updates to features of the Service, technical and security notices

Online Advertising. We may permit third party online advertising networks to collect information about your use of our website over time so that they may play or display ads that may be relevant to your interests on our Service as well as on other websites or apps. Typically, the information we share is provided through cookies or similar tracking technologies, which

recognize the device you are using and collect information, including click stream information, browser type, time and date you visited the site, and other information. This information is used to display targeted ads on or through our Services, or to our users or visitors to our websites on other websites or apps. We or the online advertising networks use this information to make the advertisements you see online more relevant to your interests. You may be able to set your browser to delete cookies or alert you when cookies are set. Please refer to your browser's or mobile device's technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. Note that disabling cookies may disable many features available through the Service. (To learn more about cookies, clear gifs/web beacons and related technologies, and to learn how you may be able to opt-out of interest-based advertising from many online advertising networks, you may wish to visit http://www.allaboutcookies.org and/or the Network Advertising Initiative's online resources, at http://www.networkadvertising.org). You may also manage certain advertising cookies by visiting the EU-based Your Online Choices at www.youronlinechoices.com/uk/your-ad-choices. If you access our service on your mobile device, you may not be able to control tracking technologies through settings.

How long we keep your content and information: Following termination or deactivation of your User account, The Guestbook may retain your profile information and content for a commercially reasonable time for backup, archival, or audit purposes. The Guestbook may retain your anonymized or aggregated profile information and content in perpetuity after deleting all personally identifiable data.

You have the right to access your personal information: You may access your data to review or correct it through the My Account pages. You may also delete your account entirely through the My Account pages. Upon receipt of your request to delete your account, we will promptly delete the account, though we may retain and use certain information if necessary to comply with our legal obligations, resolve disputes, and enforce our agreements, and all information stored in our backup data repository will be deleted pursuant to our standard deletion policy. Please be aware that we will not be able to delete any content that has already been shared with others, and that we do not control information that third parties may have about you. If you have any questions about accessing, reviewing, modifying, or deleting your account information, you can contact us directly at contact@theguestbook.com.

5. CHILDREN'S PRIVACY

The Guestbook does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register as Users. In the event that we learn that we have collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at contact@theguestbook.com.

6. LINKS TO OTHER WEB SITES AND SERVICES

We are not responsible for the practices employed by websites or services linked to or from the Service, including the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible for and we do not have any control over any third-parties that you authorize to access your content. If

you are using a third-party website or service (like Facebook) and you allow such a third-party access to your content, you do so at your own risk. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources other than through the Service.

7. HOW TO RESOLVE COMPLAINTS

In compliance with the EU-US Privacy Shield Principles, The Guestbook commits to resolve complaints about your privacy and our collection or use of your personal information. European Union individuals with inquiries or complaints regarding this privacy policy should first contact The Guestbook at: contact@theguestbook.com.

The Guestbook has further committed to refer unresolved European Union individuals' privacy complaints under the EU-US Privacy Shield Principles BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

Note: there is the possibility under certain limited conditions, for an individual to invoke "last resort" binding arbitration before the Privacy Shield Panel.

In compliance with the Swiss-US Privacy Shield Principles, The Guestbook commits to resolve complaints about your privacy and our collection or use of your personal information. Swiss individuals with inquiries or complaints regarding this privacy policy should first contact The Guetsbook at: contact@theguestbook.com.

The Guestbook has further committed to refer unresolved Swiss citizens' privacy complaints under the EU-Swiss Safe Harbor Principles BBB SWISS SAFE HARBOR, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, please visit http://www.bbb.org/us/safe-harbor-complaints for more information and to file a complaint.

The Guestbook is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

8. HOW TO CONTACT US

If you have any other questions about this Privacy Policy or the Service, please contact us at contact@theguestbook.com.

9. CHANGES TO OUR PRIVACY POLICY

The Guestbook may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the policy in a material manner we will let you know and update the 'last modified' date at the bottom of this page.

This privacy policy was last modified on September 27, 2016.