

## **Privacy Policy**

This Privacy Policy was last updated on May 04, 2018.

Our Privacy Policy:

Welcome to the web site (the “Site”) of Vertikal Creative Ventures, (DBA) Vertikal Alliance Int. (“VK Creative Ventures”, “we”, “us” and/or “our”). This Site is operated by VK Creative Ventures and has been created to provide information about our company and its services (the “Services”) to our users (“you”, “your”). This Privacy Policy sets forth VK Creative Ventures’s policy with respect to information including personally identifiable data (“Personal Data”) and other information that is collected from Site visitors and users of the Services.

Information We Collect:

When you interact with us through the Site or the Services, we may collect Personal Data and other information from you, as further described below:

**Personal Data That You provide Through the Site:** We collect Personal Data from you when you voluntarily provide such information such as when you register for access to the Services (for example, name, email address, and payment information), use certain Services, contact us with inquiries or respond to one of our surveys. Wherever VK Creative Ventures collects Personal Data we make an effort to provide a link to this Privacy Policy.

By voluntarily providing us with Personal Data, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of VK Creative Ventures and the authorized third parties referred to herein located in the United States and abroad.

International Transfer

Your information may be transferred to - and maintained on - computers located outside of your state, province, country or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to provide information to us, VK Creative Ventures transfers personal information to the United States and processes it there. Your consent to this privacy policy followed by your submission of such information represents your agreement to that transfer.

### Non-Identifiable or Aggregated Data:

When you interact with VK Creative Ventures through the Site or Services, we receive and store certain personally non-identifiable information. Such information, which is collected passively using various technologies, cannot presently be used to specifically identify you. VK Creative Ventures may store such information itself or such information may be included in databases owned and maintained by VK Creative Ventures affiliates, agents or service providers. This Site may use such information and pool it with other information to track, for example, the total number of visitors to our Site, the number of visitors to each page of our Site, the domain names of our visitors' Internet service providers, and how our users use and interact with the VK Creative Ventures Service. Also, in an ongoing effort to better understand and serve the users of the Services, VK Creative Ventures often conducts research on its customer demographics, interests and behavior based on the Personal Data and other information provided to us. This research may be compiled and analyzed on an aggregate basis. VK Creative Ventures may share this non-identifiable and aggregate data with its affiliates, agents and business partners, but this type of non-identifiable and aggregate information does not identify you personally. VK Creative Ventures may also disclose aggregated user statistics in order to describe our services to current and prospective business partners and to other third parties for other lawful purposes.

In operating this Site, we may also use a technology called "cookies." A cookie is a piece of information that the computer that hosts our Site gives to your browser when you access the Site. Our cookies help provide additional functionality to the Site and help us analyze Site usage more accurately. For instance, our Site may set a cookie on your browser that allows you to access the Site without needing to remember and then enter a password more than once during a visit to the Site. In all cases in which we use cookies, we will not collect Personal Data except with your permission. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to turn cookies off. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Site's features.

### Our Use of Your Personal Data and Other Information:

VK Creative Ventures uses the Personal Data you provide in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to obtain access to the Services, we will use your Personal Data to provide you with access to such services and to monitor your use of such services.

VK Creative Ventures and its subsidiaries and affiliates (the “Related Companies”) may also use your Personal Data and other personally non-identifiable information collected through the Site to help us improve the content and functionality of the Site, to better understand our users and to improve the Services. VK Creative Ventures and its Related Companies may use this information to communicate with you regarding the Services or to tell you about services we believe will be of interest to you. If we do so, each marketing communication we send you will contain instructions permitting you to "opt-out" of receiving future marketing communications. In addition, if at any time you wish not to receive any future communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below. Note however that as user of the Service you cannot opt-out of some administrative communications that are reasonably necessary to the Service, such as billing or service notifications.

If VK Creative Ventures intends on using any Personal Data in any manner that is not consistent with this Privacy Policy, you will be informed of such anticipated use prior to or at the time at which the Personal Data is collected.

Our Disclosure of Your Personal Data and Other Information:

VK Creative Ventures is not in the business of selling your information. We consider this information to be a vital part of our relationship with you. There are, however, certain circumstances in which we may share your Personal Data with certain third parties without further notice to you, as set forth below:

**Business Transfers:** As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets.

**Related Companies:** We may also share your Personal Data with our Related Companies for purposes consistent with this Privacy Policy.

**Agents, Consultants and Related Third Parties:** VK Creative Ventures, like many businesses, sometimes hires other companies to perform certain business-related functions. Examples of such functions include mailing information, maintaining databases and processing payments. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function.

**Third Party Services:** Some portions of the VK Creative Ventures Service might implement software solutions from Third Parties (e.g. Google Maps). Your use of these Third Party Services is subject to the respective service’s term of use.

Legal Requirements: VK Creative Ventures may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of VK Creative Ventures, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

## Log Data

When you visit the Service, whether as a Member or a non-registered user just browsing (any of these, a “VK Creative Ventures User”), our servers automatically record information that your browser sends whenever you visit a website (“Log Data”). This Log Data may include information such as your computer's Internet Protocol (“IP”) address, browser type or the webpage you were visiting before you came to the Service, pages of the Service that you visit, the time spent on those pages, information you search for on the Service, access times and dates, and other statistics. We use this information to monitor and analyze use of the Service and for the Service’s technical administration, to increase the Service’s functionality and user-friendliness, and to better tailor the Service to our visitors' and users’ needs. We also use this information to verify that visitors to and users of the Service meet the criteria required to process their requests. We do not treat Log Data as Personal Data or use it in association with other Personal Information, though we may aggregate, analyze and evaluate such information for the same purposes as stated above regarding other Non-Identifying or Aggregated Data.

## Listed Trips

If you post a trip, we may publish that trip publicly via the Service and may enable third parties to publish your trip on their websites through the use of an HTML “widget” or other. We may also display the geographical location of your trip and your current location so that potential Travelers can see the destination of your trip. If you request to make a booking via the Service, VK Creative Ventures may share pieces of the Traveler’s Identify Information with the Trip Organizer, including, but not limited to, full name, phone number and email address. When a Trip Organizer receives a booking we may share pieces of the Trip Organizer’s Identify Information, including, but not limited to, full name, phone number, the trip’s starting location and/or address and the Trip Organizer’s email address, with the applicable Traveler, so that the Traveler and Trip Organizer may contact one another directly. Booking or rejecting a customer's request is solely within the control and discretion of the Travel Organizer. VK Creative Ventures has no control or influence with the Travel Organizers as to their decisions. In no event is a Traveler's full payment information shared with a Trip Organizer.

## Testimonials

With your consent we may post your testimonial on the Service along with your name. If you want your testimonial removed please contact us.

## You're Choices:

You can use the Site without providing any Personal Data. If you choose not to provide any Personal Data, you may not be able to use certain Services.

## Exclusions:

This Privacy Policy does not apply to any Personal Data collected by VK Creative Ventures other than Personal Data collected through the Site or Services. This Privacy Policy shall not apply to any unsolicited information you provide to VK Creative Ventures through this Site or through any other means. This includes, but is not limited to, information posted to any public areas of the Site, such as bulletin boards (collectively, "Public Areas"), any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, "Unsolicited Information"). All Unsolicited Information shall be deemed to be non-confidential and VK Creative Ventures shall be free to reproduce, use, disclose, distribute and exploit such Unsolicited Information without limitation or attribution.

## Children:

VK Creative Ventures does not knowingly collect Personal Data from persons under the age of 18. If you are under the age of 18, please do not submit any Personal Data through the Site. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on this Site without their permission. If you have reason to believe that a child under the age of 18 has provided Personal Data to VK Creative Ventures through this Site, please contact us, and we will endeavor to delete that information from our databases.

## Links to Other Web Sites:

This Privacy Policy applies only to the Site. This Site may contain links to other web sites not operated or controlled by VK Creative Ventures (the "Third Party Sites"). The policies and procedures we described here do not apply to the Third Party Sites. The links from this Site do not imply that VK Creative Ventures endorses or has reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy policies.

## Integrating Third Party Services within the Services:

The Service may allow you to enable various online third party services, such as social media and networking services (“Integrated Services”). By directly integrating these services, we make your online experiences richer and more personalized. To take advantage of this feature, we may ask you to provide us your username and password for the relevant Integrated Service. By enabling or logging in via such Integrated Services, you are allowing us to pass your log-in information to these service providers for this purpose. When you add an Integrated Services account to the Service or log into the Service using your Integrated Services account, we will collect your login information and other relevant information necessary to enable the Service to access that Integrated Service and your data contained within that Integrated Service. As part of such integration, the Integrated Service will provide us with access to certain information that you have provided to such Integrated Service, and we will use, store and disclose such information in accordance with this Privacy Policy. However, please remember that the manner in which Integrated Services use, store and disclose your information is governed by the policies of such third parties, and VK Creative Ventures shall have no liability or responsibility for the privacy practices or other actions of any Integrated Services that may be enabled within the Service.

#### Security:

VK Creative Ventures takes reasonable steps to protect the Personal Data provided via the Site from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet, email or other electronic transmission is ever fully secure or error free, so you should take special care in deciding what information you send to us in this way.

#### Other Terms and Conditions:

Your access to and use of this Site is subject to VK Creative Ventures’s Terms of Service which can be found on our Website.

#### Changes to VK Creative Ventures’s Privacy Policy:

The Site and our business may change from time to time. As a result, at times it may be necessary for VK Creative Ventures to make changes to this Privacy Policy. VK Creative Ventures reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice. Please review this policy periodically, and especially before you provide any Personal Data. This Privacy Policy was last updated on the date indicated above. Your continued use of the Site after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

## Access to Information; Contacting VK Creative Ventures:

To keep your Personal Data accurate, current, and complete, please contact us as specified below. We will take reasonable steps to update or correct Personal Data in our possession that you have previously submitted via this Site or Services.

Please also feel free to contact us if you have any questions about VK Creative Ventures's Privacy Policy or the information practices of this Site.

## Dispute Resolution

If you have a complaint about VK Creative Ventures's privacy practices you should write to us at: VK Creative Ventures Inc, Attn: Privacy Officer, 5045 N 17<sup>th</sup> Avenue Ste 102, Phoenix Arizona 85015 or by contacting us via [info@vertikalmediagroup.com](mailto:info@vertikalmediagroup.com) We will take reasonable steps to work with you to attempt to resolve your complaint.

## EEA, SWITZERLAND AND UK ONLY

### The EU General Data Protection Regulation (GDPR)

In May 2018, a new data privacy law known as the EU General Data Protection Regulation (or the "GDPR") becomes effective. The GDPR requires VK Creative Ventures and Travel Organizers using the Service to provide Users with more information about the processing of their Personal Data. Here is what you need to know:

Legal grounds for processing your Personal Data the GDPR requires us to tell you about the legal ground we're relying on to process any Personal Data about you. The legal grounds for us processing your Personal Data for the purposes set out in this privacy policy above will typically be because:

- You provided your consent;
- it is necessary for our contractual relationship;
- the processing is necessary for us to comply with our legal or regulatory obligations; and/or
- the processing is in our legitimate interest as a payment platform for travel organizers (for example, to protect the security and integrity of our systems and to provide you with customer service, etc.).

## Transfers of Personal Data

As VK Creative Ventures is a global company, we may need to transfer your Personal Data outside of the country from which it was originally provided. This may be intra-group or to

third parties that we work with who may be located in jurisdictions outside the EEA, Switzerland and the UK which have no data protection laws or laws that are less strict compared with those in Europe. Whenever we transfer Personal Data outside of the EEA, Switzerland or the UK, we take legally required steps to make sure that appropriate safeguards are in place to protect your Personal Data. Feel free to contact us for more information about the safeguards we have put in place to protect your Personal Data and privacy rights in these circumstances.

### Personal Data retention

We retain your Personal Data for as long as necessary to provide you with our Services, or for other important purposes such as complying with legal obligations, resolving disputes, and enforcing our agreements. If you have an account with us, we will typically retain your Personal Data for a period of 90 days after you have requested that your account is closed or if it's been inactive for 7 years.

### Your Rights.

Data protection law provides you with rights in respect of Personal Data that we hold about you, including the right to request a copy of the Personal Data, request that we rectify, restrict or delete your Personal Data, object to profiling and unsubscribe from marketing communications.

For the most part, you can exercise these rights by logging in and visiting the Profile and My Trips pages or changing the "cookie settings" in your browser. If you can't find what you're looking for in the Profile or My Trips pages, please contact us. Please note that requests to exercise data protection rights will be assessed by us on a case-by-case basis. There may be circumstances where we are not legally required to comply with your request because of the laws in your jurisdiction or because of exemptions provided for in data protection legislation.

If you have a complaint about how we handle your Personal Data, please get in touch with us as set forth in section "Dispute Resolution" to explain. If you are not happy with how we have attempted to resolve your complaint, you may contact the relevant data protection authority.

VK Creative Ventures as a data controller and a data processor

EU data protection law makes a distinction between organizations that process Personal Data for their own purposes (known as "data controllers") and organizations that process personal data on behalf of other organizations (known as "data processors"). If you have a

question or complaint about how your Personal Data is handled, these should always be directed to the relevant data controller since they are the ones with primary responsibility for your Personal Data.

VK Creative Ventures may act as either a data controller or a data processor in respect of your Personal Data, depending on the circumstances.

For example, if you create an account with us to organize travel, VK Creative Ventures will be a data controller in respect of the Personal Data that you provide as part of your account. We will also be a data controller of the Personal Data that we have obtained about the use of the Applications or VK Creative Ventures Properties, which could relate to Organizers or participants. We use this to conduct research and analysis to help better understand and serve Users of the Services as well as to improve our platform and might provide you with more targeted recommendations about travel offerings we think may be of interest to you.

However, if you register for an trip as a participant, we will process your Personal Data to help administer that trip on behalf of the Organizer (for example, sending confirmation, promotional and feedback emails, processing payments, etc.) and to help the Organizer target, and understand the success of, their trip and trip planning (for example, providing trip reports, using analytics to gain insights into the effectiveness of various sales channels, etc.). In these circumstances, VK Creative Ventures merely provides the "tools" for Organizers; VK Creative Ventures does not decide what Personal Data to request on registration forms, nor is it responsible for the continued accuracy any Personal Data provided. Any questions that you may have relating to your Personal Data and your rights under data protection law should therefore be directed to the Organizer as the data controller, not to VK Creative Ventures .

If you have any questions about this Privacy Policy, please at [info@vertikalmediagroup.com](mailto:info@vertikalmediagroup.com).