

## Privacy Notice

UPDATED AS OF: July 20<sup>th</sup> 2013

TPG Rewards, Inc. is committed to maintaining your confidence and trust as it relates to the privacy of your information. Please read below and learn how we collect, protect, share and use your information during your participation in any of our promotions and when you visit our technology platforms, including, without limitation, our websites, interactive features, applications, social network pages, and mobile application (“Platforms”).

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#### 1. INFORMATION COLLECTED ON OUR PLATFORMS.

##### Information You Provide To Us

We may collect Personal Information (information that can be used to identify you as an individual) such as your name, email, telephone number, home address, demographic information (such as zip code, age), or payment information (such as account or credit card number). The types of Personal Information we collect may vary depending on your use of the features of the Platforms. In many cases we need this information to provide the personalized or enhanced service that you are interested in. You never have to answer our questions regarding your Personal Information, and you can decline this exchange of information on any site on the Internet - not just ours - at any time.

## Information Collected Automatically

*Usage Information.* Whenever you participate in one of our programs or visit or interact with the Platforms, we, as well as any third-party advertisers and/or service providers, may use a variety of technologies that automatically or passively collect information about how the programs or Platforms are accessed and used (“Usage Information”). Usage Information may include browser type, device type, operating system, application version, the page served, the time, the preceding page views, and your use of features or applications on the Platforms, interaction with friends and group activities, information derived from receipts, purchasing trends and online and offline activities and interests. This information helps us keep our programs and Platforms fresh and interesting to our visitors and allows us to tailor content to a visitor’s interests. We may also anonymize or group this information into aggregate visitor data in order to describe the use of the Platforms or promotion to our existing or potential business partners, sponsors or other third parties.

*Device Identifier.* We automatically collect your IP address or other unique identifier (“Device Identifier”) for the Device (computer, mobile phone, tablet or other device) you use to access the promotions or Platforms. A Device Identifier is a number that is assigned to your Device when you access a website or its servers, and our computers identify your Device by its Device Identifier. We may use a Device Identifier to, among other things, administer the Platforms, help diagnose problems with our servers, analyze trends, track users’ web page movements, help identify you and your promotion entry, and gather broad demographic information for aggregate use.

*Cookies; Pixel Tags.* The technologies used in our promotions and on the Platforms to collect Usage Information, including Device Identifiers, include but are not limited to: cookies (data files placed on a Device when it is used to visit the Platforms), mobile analytics software and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed). Cookies may also be used to associate you with social networking sites like Facebook and Twitter and, if you so choose, enable interaction between your activities on the Platforms and your activities on such social networking sites. We, or our vendors, may place cookies or similar files on your Device for security purposes, to facilitate site navigation and to personalize your experience while visiting our Platforms (such as allowing us to select which ads or offers are most likely to appeal to you, based on your interests, preferences, location, or demographic information). A pixel tag may tell your browser to get content from another server.

To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your browser’s cookie folder, please refer to your browser’s help menu or other instructions related to your browser. If you do disable or opt out of receiving cookies, please be aware that some features and services on our Platforms may not work properly because we may not be able to recognize and associate you with your TPG Rewards account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

## 2. HOW WE USE THE INFORMATION WE COLLECT

We use the information we collect about and from you for a variety of business purposes such as to respond to your questions and requests; provide you with access to certain areas and features of the Platforms or programs and your interaction with other users; verify your identity; communicate with you about your account and activities on the Platforms and, in our discretion, changes to any TPG Rewards policy; tailor content, advertisements, and offers we or our business partners may serve you; improve the Platforms; comply with license obligations; and for purposes disclosed at the time you provide your Personal Information or otherwise with your consent. We may also collect your location based information for the purpose of providing you with certain services.

## 3. SHARING OF INFORMATION

Except as described in this Privacy Notice, we will not provide any of your Personal Information to any third parties without your consent. We may share non-Personal Information, such as aggregate data and Usage Information with third parties. We may also share your information as disclosed at the time you provide your information, as set forth in this Privacy Notice and in the following circumstances:

**Third Parties Providing Services On Our Behalf.** We create promotions with consumer product companies who sponsor the offers that we provide to you. We may share your Personal Information and Usage Information with such consumer product companies and also third parties that perform functions on our behalf (or on behalf of our partners) such as service providers that host or operate our Platforms, analyze data, process transactions and payments, or provide customer service; advertisers; sponsors or other third parties that participate in or administer our promotions, contests, sweepstakes, surveys or provide marketing or promotional assistance and “powered by” partners or partners in co-branded sites. Your Personal Information may also be used by us or shared with our subsidiaries, affiliates, sponsors, partners, advertisers or other third parties to provide you with product information and promotional and other offers.

**Your Agreement To Have Your Personal Information Shared.** While on our Platforms, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else or to otherwise consent to the sharing of your information with a third party, including social networking sites such as Facebook or Twitter. If you agree to have your Personal Information shared, your Personal Information will be disclosed to the third party and the Personal Information you disclose will be subject to the privacy policy and business practices of that third party.

**Business Transfers.** We may share your Personal Information with other entities and our affiliates primarily for business and operational purposes. In the event that TPG Rewards is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction.

**Legal Disclosure.** We may transfer and disclose your information to third parties to comply with a legal obligation; when we believe in good faith that the law or a governmental authority requires it; to verify or enforce our Terms of Use or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect our rights or property or security of third parties, visitors to our Platforms or the public.

#### 4. **INFORMATION WE RECEIVE FROM THIRD PARTIES**

We may receive information about you from third parties. For example, if you are on another website and you opt-in to receive information from TPG Rewards, that website will submit to us your email address and other information about you so that we may contact you as requested. You may also choose to participate in a third party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third party website) through which you allow us to collect (or the third party to share) information about you, including Usage Information and Personal Information such as lists of your friends, “likes”, comments you have shared, groups and location. Services like Facebook Connect may give you the option to post information about your activities on our Platform to your profile page to share with others within your network. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections” or information about you is otherwise accessible through your “connections” web page, profile page, or similar page on a social networking or other third party website or interactive service. We may supplement the information we collect about you through the Platforms with such information from third parties in order to enhance our ability to serve you, to tailor our content to you and/or to offer you opportunities to purchase products or services that we believe may be of interest to you.

#### 5. **YOUR PRIVACY RIGHTS, CHOICE AND ACCESS.**

You may always direct us not to share your Personal Information with third parties, not to use your Personal Information to provide you with information or offers, or not to send you newsletters, emails or other communications by: (i) modifying your registered user information on the Platforms; (ii) sending us an email at customerservice@tpgny.com; (iii) contacting us by mail at TPG Rewards Inc, 111 John Street, 27<sup>th</sup> Floor, New York, NY 10038; or (iv) following the removal instructions in the communication that you receive. Your opt-out request will be processed within 30 days of the date on which we receive it.

If you wish to modify, verify, correct, or delete any of your Personal Information collected through the Platforms, you may edit your registered user information or contact us at the above address or email. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Platforms. We are under no obligation to store such Personal Information indefinitely and disclaim any liability

arising out of, or related to, the destruction of such Personal Information. It may not always be possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons. We will retain your information (including geo-location data) for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services contact us at [customerservice@tpgny.com](mailto:customerservice@tpgny.com). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We do not control certain privacy settings and preferences maintained by our social media partners like Facebook and Twitter. If you wish to make changes to those settings and preferences, you may do so by visiting the settings page of the appropriate social media site.

## **6. ADVERTISING/BEHAVIORAL TARGETING; HOW TO OPT-OUT.**

We may use third party ad network providers to help present ads on the Platforms, as well as other service providers to evaluate and provide us with information about the use of the Platforms and viewing of our content. We do not share Personal Information with these providers (unless, of course, you give us permission). Such providers may place and access cookies, pixel tags, or similar technologies on your Device to serve you ads or other content personalized to your interests which they infer from your browsing on the Platforms and other sites you have visited. In doing so, the provider collects or has access to non-Personal Information such as your Usage Information. The use of cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

If you do not want to receive the benefits of targeted advertising, you may opt out of some network advertising programs that use your information by visiting the NAI Opt-Out Page at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp). Please note that even if you choose to remove your information (opt out), you will still see advertisements while you're browsing online. However the advertisements you see may be less relevant to you and your interests. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides a mechanism to opt out of receiving cookies from those companies.

## **7. CHILDREN.**

We do not knowingly collect, use or disclose personally identifiable information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records.

## **8. SECURITY OF YOUR INFORMATION.**

We take information security seriously and use certain reasonable security measures to help protect your Personal Information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use the Platforms and provide us with your information at your own risk.

## **9. OTHER SITES.**

The Platforms may contain links to other sites that we do not own or operate. This includes links from advertisers, sponsors and/or partners that may use our logo(s) as part of a co-branding or co-marketing agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies to your Device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Platforms (including those linked to through an email or social networking page).

The Platforms may make available chat rooms, forums, message boards, and news groups. Remember that any information that you disclose in these areas becomes public information and is not subject to the provisions of this Privacy Notice.

**10. CONSENT TO PROCESSING AND TRANSFER OF INFORMATION.**

The Platforms are governed by and operated in, and in accordance with the laws of, the United States. TPG Rewards makes no representation that the Platforms are governed by or operated in accordance with the laws of any other nation. Given that we are an international business, our use of your information necessarily involves the transmission of data on an international basis. If you are located in the European Union, Canada or elsewhere outside of the United States, please be aware that information we collect may be transferred to and processed in the United States. By using the Platforms, or providing us with any information, you (a) acknowledge that the Platforms are subject to the laws of the United States, (b) consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen, and (c) waive any claims that may arise under those laws.

**11. CHANGES.**

We may update this Privacy Notice to reflect changes to our information practices. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on our Platforms prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

**12. CONTACT US.**

If you have any questions or concerns about this Privacy Notice, the practices of the Platforms, or your experiences with the Platforms, please contact us at:

TPG Rewards Inc., 111 John Street, 27<sup>th</sup> Floor, New York, NY 10038, 800 838-4550

Email: [Customerservice@tpgny.com](mailto:Customerservice@tpgny.com)