

VisualTravelTours Privacy Policy

May 24, 2008

At VisualTravelTours we recognize that your privacy is important to you. This Policy applies to all of the products and services offered by our Company.

VisualTravelTours adheres to the US safe harbor privacy principles of Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement.

If you have any questions about this Policy, please feel free to [contact us](#) through our website or write to us at Privacy Matters, c/o VisualTravelTours, 3905 State St. # 7-128, Santa Barbara, CA 93105.

Information we collect and how we use it:

- **Non-Account Activity.** We offer a number of services that do not require you to register for an Account or provide any personal information to us. You can access and use the website VisualTravelTours to find Visual and Audio Tours for specific locations, view samples, and purchase them for download or shipment.
- **Related Activity.** Certain other activities on the VisualTravelTours website – like accessing the Provider Island in order to upload Tour Production Materials - require you to have a VisualTravelTours Account. We ask for some personal information when you create an Account, including your email address and a password, which is used to protect your account from unauthorized access. We utilize this personal information to contact you regarding the tour approval and production process, or to deliver information and or products you request.
- **Usage Information.** We may record information about your usage, such as when you use the VisualTravelTours website, the locations, groups, and favorites you access, and the frequency and size of data transfers, as well as information you display or click on in VisualTravelTours (including UI elements, settings, and other information), in order to improve our service to you. If you are logged in, we may associate that information with your account. We may use clear GIFs (a.k.a. "Web Beacons") in HTML-based emails sent to our users to track which emails are opened by recipients.
- **Content Uploaded to Site.** Any personal information, pictures, audio/video content, or other data that you voluntarily disclose online as a part of the Tour and it's promotion materials during the Tour Production Process (as opposed to the private data which you enter in your VisualTravelTours Account) may become publicly available as part of your Tour package and may then be collected and used by Sample viewers (without restriction) and purchasers (to the extent permitted by copyright).

In order to efficiently provide our full range of services, we may collect the following types of information:

- **Information you provide** - When you sign up for a VisualTravelTours Account or other VisualTravelTours service or promotion that requires registration, we ask you for personal information such as your name, email address and an account password, which remains in your private account and is not accessible by the general public or other VisualTravelTours Account holders. For certain services, such as our Royalty Payments System, we may also request bank account direct deposit information which we maintain in password-protected form on our servers. We may combine the information you submit under your account with information from other VisualTravelTours services or third parties in order to provide you with a better experience and to

improve the quality of our services. For certain services, we may give you the opportunity to opt out of combining such information.

- **VisualTravelTours cookies** - When you visit VisualTravelTours, we send one or more cookies - a small file containing a string of characters - to your computer that uniquely identifies your browser. We use cookies to improve the quality of our service by storing user preferences and tracking user trends, such as how people search. Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some VisualTravelTours features and services may not function properly if your cookies are disabled.
- **Log information** - When you use VisualTravelTours services, our servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.
- **User communications** - When you send email or other communication to VisualTravelTours, we may retain those communications in order to process your inquiries, respond to your requests and improve our services.
- **Affiliated sites** - We offer some of our services in connection with other web sites. Personal information that you provide to those sites may be sent to VisualTravelTours in order to deliver the service. We process such information in accordance with this Policy. The affiliated sites may have different privacy practices and we encourage you to read their privacy policies.
- **Links** - VisualTravelTours may present links in a format that enables us to keep track of whether these links have been followed. We use this information to improve the quality of our search technology, customized content and advertising.
- **Other sites** - This Privacy Policy applies to web sites and services that are owned and operated by VisualTravelTours. We do not exercise control over the sites displayed as search results or links from within our various services. These other sites may place their own cookies or other files on your computer, collect data or solicit personal information from you using their own Privacy Policies, which may differ from ours.

Personal Information

VisualTravelTours only processes personal information for the purposes described in this Privacy Policy.

- Your account name (not any other Private information in your Account including your email address) may be displayed to other Users when they view your Tour Sample(s). All the material you submit for the Tour Sample(s) to the VisualTravelTours sites may be redistributed through the internet and other media channels, and may be viewed by the general public.
- If you submit personally identifiable information to us through the VisualTravelTours sites, we use your personal information to operate, maintain, and provide to you the features and functionality of the VisualTravelTours sites, as well as provide special personalized features to you.
- We do not use your email address or other personally identifiable information to send commercial or marketing messages without your consent or except as part of a specific program or feature for which you will have the ability to opt-in or opt-out. We may, however, use your email address without further consent for non-marketing or administrative purposes (such as notifying you of major VisualTravelTours Site changes or for customer service purposes).

- We use both your personally identifiable information and certain non-personally-identifiable information (such as anonymous User usage data, cookies, IP addresses, browser type, clickstream data, etc.) to improve the quality and design of the VisualTravelTours Sites and to create new features, promotions, functionality, and services by storing, tracking, and analyzing User preferences and trends.
- We use cookies, clear gifs, and log file information to: (a) store information so that you will not have to re-enter it during your visit or the next time you visit the VisualTravelTours Sites; (b) provide custom, personalized content and information; (c) monitor the effectiveness of our marketing campaigns; (d) monitor aggregate metrics such as total number of visitors, pages viewed, etc.; and (e) track your entries, submissions, and status in promotions, sweepstakes, and contests.

In addition to the above, such purposes include:

- Providing our products and services to users, including the display of customized content and advertising;
- Auditing, research and analysis in order to maintain, protect and improve our services;
- Ensuring the technical functioning of our network; and
- Developing new services.

VisualTravelTours processes personal information on our servers in the United States of America. We may process personal information to provide our own services. In some cases, we may process personal information on behalf of and according to the instructions of a third party, such as our advertising partners. However, we do not give your private information to third parties if you have opted out.

Choices for personal information

When you sign up for a particular service that requires registration, we ask you to provide personal information. If we use this information in a manner different than the purpose for which it was collected, then we will ask for your consent prior to such use.

If we propose to use personal information for any purposes other than those described in this Policy and/or in the specific service notices, we will offer you an effective way to opt out of the use of personal information for those other purposes. We will not collect or use sensitive information for purposes other than those described in this Policy and/or in the specific service notices, unless we have obtained your prior consent.

You can decline to submit personal information to any of our services, in which case VisualTravelTours may not be able to provide those services to you.

Information sharing

VisualTravelTours only shares personal information with other companies or individuals outside of VisualTravelTours in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.

- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against imminent harm to the rights, property or safety of VisualTravelTours, its users or the public as required or permitted by law.

If VisualTravelTours becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will provide notice before personal information is transferred and becomes subject to a different privacy policy.

We may share with third parties certain pieces of aggregated, non-personal information, such as the number of users who searched for a particular item, for example, or how many users clicked on a particular advertisement. Such information does not identify you individually.

Please contact us at the address below for any additional questions about the management or use of personal data.

Information security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to VisualTravelTours employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Data integrity

VisualTravelTours processes personal information only for the purposes for which it was collected and in accordance with this Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

Accessing and updating personal information

When you use VisualTravelTours services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Some of our services have different procedures to access, correct or delete users' personal information. We provide the details for these procedures in the specific privacy notices or FAQs for these services.

Enforcement

VisualTravelTours regularly reviews its compliance with this Policy. Please feel free to direct any questions or concerns regarding this Policy or VisualTravelTours's treatment of personal information by contacting us through this web site or by writing to us at Privacy Matters, c/o VisualTravelTours Inc., 3905 State St., Santa Barbara, CA 93105. When we receive formal written complaints at this address, it is VisualTravelTours's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between VisualTravelTours and an individual.

Changes to this policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Policy changes). Each version of this Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive for your review.

If you have any additional questions or concerns about this Policy, please feel free to contact us any time through this web site or at Privacy Matters, c/o VisualTravelTours Inc., State St., Santa Barbara, CA 93105.