

**Violet Clover Travel Group**

Brunswick, OH 44212

[info@violetclovertravelgroup.com](mailto:info@violetclovertravelgroup.com)

216-236-8450



## **PRIVACY POLICY**

*EFFECTIVE MARCH 25, 2018*

This is the Privacy Policy for **Violet Clover Consulting, LLC dba Violet Clover Travel Group**, (“VCTravelGroup”) an independently owned and operated travel agency. References herein to “we,” “us,” and “our” shall mean VCTravelGroup.

Your privacy is extremely important to us. This Privacy Policy states the principles and practices that apply to our collection and use of information that you, our clients and prospective clients (hereinafter referred to as “you” and “your”) provide to us, whether in person, by telephone, mail or e-mail, or through our web site <http://www.violetclovertravelgroup.com> (referred to as this “Site”).

This Privacy Policy is based upon VCTravelGroup’s activities as a United States entity conducting business in the United States and is not intended to address privacy issues that may arise in any other contexts. This policy applies to VCTravelGroup and all of its operations and subsidiary companies.

### **1. Collection of Information by Site Users**

You can view this Site without telling us who you are or revealing any personal identifying information about yourself. However, you may *voluntarily* provide certain personal identifying information to us in connection with your purchase of travel-related products and services (all of which will be referred to as “Personal Information”). If you choose to provide us with Personal Information, you consent to our collection of that information and to the transfer and storage of that information on our servers located in the United States. Personal Information includes all information you voluntarily provide to us, whether in person, by telephone, mail or e-mail, or on this Site, such as: (i) your contact information (e.g. name, telephone number, passport number, driver’s license or state identification number, and postal and e-mail addresses); (ii) financial information (e.g. credit card number, security code, password, cardholder name, billing address, and expiration date); and (iii) information related to your travel profile (e.g. travel preferences, including seat selection, frequent flyer/hotel/car rental program information, booking history and interests, and special health accommodations).

In addition to any Personal Information you may voluntarily provide to us, this Site also collects general information regarding visitors and users of this Site as it relates to their use of the Site (referred to herein as “Aggregated Data”). This information is collected automatically each time a user navigates our Site. The term Aggregated Data includes, but is not limited to, such information as traffic patterns, number, frequency and duration of visits to certain pages, visits from other web sites or to third-party web sites linked to this Site, use of particular services and interest in services, information or features of the Site or other parties made available through or found at the Site. This information is anonymous and is useful for improving the content and navigational tools of our web site. Aggregated Data may also include information or data obtained from you or other sources which has been combined with or compiled from other information or data in such a manner to no longer be personally identifiable or linked to an individual. *Aggregated Data is not considered Personal Information for the purposes of this Policy.*

Our web pages may use “Cookies,” which are text files we place in your computer’s browser to store your preferences. We use Cookies to better understand site usage and to improve the content and offering on our Site. For example, we may use Cookies to personalize your experience at our Site. We also may use Cookies to offer you products, programs, or services. Cookies alone do not tell us your e-mail address or other personally identifiable information unless you choose to provide this information to us by, for example, registering on our Site. However, once you choose to furnish our Site with the personally identifiable information, this information may be linked to the data stored in the Cookie. You can always choose not to receive a Cookie file by enabling your Web browser to refuse Cookies or to prompt you before accepting a Cookie. Please note that if you refuse to accept Cookies from this Site, you may not be able to access many of the travel tools and programs offered on the Site. *The information contained in or collected by Cookies is not considered Personal Information for the purposes of this Policy.*

“Web Beacons” or clear gifs are small pieces of code placed on a web page to monitor the behavior and collect data about visitors viewing a web page. For example, Web Beacons can be used to count the users who visit a web page or to deliver a Cookie to the browser of a visitor viewing that page. We may use Web Beacons on this Site from time to time for this and other purposes. *The information contained in or collected by Web Beacons is not considered Personal Information for purposes of this Policy.*

### **2. Uses of Personal Information Collected**

We will collect and retain Personal Information you provide to us and may use the Personal Information in any manner that is consistent with the uses stated in this Policy or disclosed elsewhere in this Site at the point you submit such Personal Information. At the time you provide Personal Information or make a request, the intended use of the information you submit will be apparent in the context in which you submit it and/or because the Site states the intended purpose.

We may use your Personal Information for the following general purposes:

- (i) to provide you with the products and services you request;
- (ii) to provide you with travel confirmation and updates;
- (iii) to manage your account, including processing bills and providing travel notifications;
- (iv) to communicate with you in general;
- (v) to respond to your questions and comments;
- (vi) to notify you about any special offers and products or services that we believe may be of interest to you. Should you not wish to receive marketing communications from us or participate in our ad customization or feedback programs, please simply indicate your preference to opt out by following the directions provided in the e-mail or a link on the advertisement;
- (vii) to otherwise customize your experience with VCTravelGroup;
- (viii) to reward you as part of any reward and recognition program you choose to join;
- (ix) to request further information from you;
- (x) to prevent potentially prohibited or illegal activity;
- (xi) to tell you about targeted marketing, service updates and promotional offers based on your communication preferences; and
- (xii) to resolve disputes, collect fees, and troubleshoot problems.

### **3. Disclosure of Your Personal Information**

**a.** VCTravelGroup may share your Personal Information (only to the extent reasonably necessary or as required by the circumstances) and Aggregated Data, when applicable, with the following parties:

- (i) The affiliated event host, in order for such party to (1) assist VCTravelGroup in providing the requested travel services to you, (2) provide aggregate reporting to VCTravelGroup and certain third parties (using only Aggregated Data and not individual Personal Information when provided to third parties), and (3) provide 24/7/365 trip interruption customer support for certain eligible clients.
- (ii) Non-affiliated third party vendors and service providers which provide certain services or functions requested by you and/or which fulfill your requested transactions, including but not limited to, hotels, airlines, cruise lines, tour operators and car rental companies, as well as service providers who assist with our business operations (such as fraud investigations, bill collection and affiliate and award programs).
- (iii) Other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service).
- (iv) The appropriate parties if it is requested by a government agency or law enforcement personnel or if we are otherwise required by law to disclose it in response to subpoenas, court orders, or other legal process, to establish or exercise our legal rights, to defend against legal claims, or as otherwise required by law (in which case, we reserve the right to raise or waive any legal objection available to us).
- (v) The appropriate parties in order to investigate, prevent, or take action regarding illegal or suspected illegal activities, to protect and defend the rights, property, or safety of VCTravelGroup, our clients or others, and in accordance with our terms and conditions and other agreements.
- (vi) Other appropriate entities, such as our successors or assigns, should we undergo a corporate transaction, such as a divestiture, merger, consolidation, or asset sale.
- (vii) The appropriate parties when we believe in good faith that disclosure is required to protect the security, property, assets and/or rights of VCTravelGroup from unauthorized use or misuse of the Site or anything found at the Site.

**b.** Once your Personal Information has been shared with a non-affiliated third party in accordance with this Policy, we cannot control how that third party collects, uses or shares your Personal Information and as such, we will thereafter have no responsibility for its use. Protection of your Personal Information in the possession of any such third party shall be governed by the privacy policy of that third party.

### **4. Security of Information**

VCTravelGroup maintains a comprehensive information security program that is designed to ensure the security and confidentiality of your Personal Information by:

- (i) Protecting against any anticipated threats or hazards to the security or integrity of such information;
- (ii) Protecting against unauthorized access to or use of such information;
- (iii) Detecting, preventing and responding to, in a prompt manner, attacks, intrusions or other system failures;
- (iv) Ensuring the proper disposal of such information; and
- (v) Regularly testing or otherwise monitoring the effectiveness of VCTravelGroup's information safeguards.

E-mail communication to and from this Site is not secure unless clearly noted otherwise. This is a risk inherent in the use of e-mail. Please be aware of this when requesting information or sending Personal Information to us by e-mail.

Due to circumstances beyond the control of VCTravelGroup, and despite precautions taken to protect your Personal Information, unfortunately, there is no such thing as a perfect security system. Also, VCTravelGroup has no control over the security of the Internet in general. As a result, we cannot guarantee that unauthorized persons will never gain access to your transmissions or information, or that Personal Information will never be disclosed in ways not covered by this Privacy Policy.

## **5. Links to Third-Party Sites**

This Site may contain links to third-party web sites or resources, whose information practices may be different than ours. Prior to providing any information to such sites, you should consult the other sites' privacy policies and notices as we have no control over information that is submitted to, or collected by, these third parties. These linked sites are not under the control of VCTravelGroup, and we are not responsible for the contents of any linked site or any link contained in a linked site. VCTravelGroup is providing these links only as a convenience, and the inclusion of a link does not imply a referral to or an endorsement of the linked site by VCTravelGroup.

Our site may use a reputable third party to present or serve the advertisements that you may see on this Site. These third-party ad servers may use Cookies, Web Beacons, or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third-party ad servers is subject to their own privacy policies and is not covered by this Policy. We are not responsible for the use of information collected by such third parties.

## **6. Disclaimer Regarding Third-Party Sites**

VCTravelGroup makes no representations or warranties whatsoever about any third-party goods, services or products or any third-party web site which you may access through this Site. When you access a non-VCTravelGroup site, you understand and acknowledge that it is independent from VCTravelGroup and VCTravelGroup has no control over or responsibility for content, the privacy of information on, or the availability of that web site. You further acknowledge and agree that VCTravelGroup shall not be responsible or liable, directly or indirectly, for any damage or loss caused or alleged to be caused by or in connection with your use of or reliance on any such content, goods, services or products available on or through any such non-VCTravelGroup web site or resource.

## **7. Children's Privacy**

VCTravelGroup does not sell travel or other services for purchase by children. Please be aware that VCTravelGroup has not designed this Site for and does not intend for it to be used by, anyone under age 18. Accordingly, this Site should not be used by anyone under age 18. VCTravelGroup specifically requests that persons under the age of 18 not use this Site or submit information to the Site.

## **8. Changes to this Privacy Policy**

VCTravelGroup may update this Policy in the future and reserves the right to amend this Policy at any time. Updated versions of the Policy will be posted on this website and are effective immediately on posting. Please check frequently, especially before you use this website, to see if this Policy has changed.

## **9. Applicability of this Policy**

This Policy is applicable only to the information practices of Violet Clover Consulting, LLC and subsidiary entities. This Privacy Policy is limited in application to natural persons who are legal residents of the United States of America.

For certain situations or promotions or for certain operations, we may adopt limited-applicability privacy practices or protocols that vary from this Policy (referred to as an "Additional Privacy Protocol"). The Additional Privacy Protocol will apply for the specified situation, and in the event of a conflict between the Additional Privacy Protocol and this Policy, the Additional Privacy Protocol will control over this Policy for the expressly specified situation, promotion or operation.

## **10. Your Consent to This Privacy Policy**

By providing Personal Information to us, you are giving your consent and permission for any use of the Personal Information that is consistent with the uses stated in this Policy or elsewhere at the Site at the point you submit such Personal Information, and such consent will be presumed by VCTravelGroup, unless you expressly state otherwise at the time you submit the Personal Information. If you do not agree to the uses stated in this Policy or disclosed elsewhere at the Site, please do not use the Site or provide us with any Personal Information.

## **11. Providing Third Party Personal Information**

You should obtain the consent of any third party prior to your providing any Personal Information of that third party through this Site, as any access to view or change his/her information may be available only through your account.

## **12. Questions or Comments?**

If you have any questions or concerns about this Policy or the way we use your Personal Information, please contact us at 1446 Winged Foot Drive, Brunswick, Ohio 44212 or 216-236-8450. Your privacy is of the utmost importance to VCTravelGroup, and we welcome your feedback.

## **13. Right to Contact Visitor**

VCTravelGroup reserves the right to contact visitors to the Site, regarding their records and reservations, as well as changes to the Terms and Conditions, Privacy Policy, or any other policies or agreements relevant to Site visitors.