

# Privacy Policy

## STERLING VALLEY SYSTEMS, INC. PRIVACY POLICY

Sterling Valley Systems, Inc., doing business as “Inntopia,” is a leading provider of travel reservation technology to the destination travel market. Inntopia respects our customers’ privacy and values the trust our customers place in us. Your information is used in a confidential manner and will not be sold or disclosed to any third party except as is required to process your purchase through our system as defined below. Inntopia collects your data when you make a reservation through one of our partner web sites or call centers.

## ACCEPTANCE OF THIS PRIVACY POLICY

In order to run our business and to provide you with our products and services, we require certain personal information (your “personal information”) that includes information that identifies you and, with regard to the need to meet certain legal requirements, the location from which you send us your personal information. We will take commercially reasonable measures to protect the privacy and security of your information, but if you do not agree with this Privacy Policy or the additional descriptions of how we process your personal information (how we use, share, disclose, store and delete it), you should not use our Services. If you register for an event and we seek to share your personal information with the event sponsor and/or other third parties we will, depending upon your jurisdiction, request your affirmative consent to do so on the registration form.

## WHAT WE COLLECT AND HOW WE USE IT

We collect personal information necessary to fulfill your purchase, which could include but is not limited to the following data:

- Name
- Names of travel companions
- Address and ZIP Code
- Telephone number
- Date of birth
- Gender
- Age
- Email address
- Credit card payment information

We use this data to process your purchase of travel products, goods, or services; collect or refund payment; cancel or modify a reservation; perform testing and Quality Assurance functions to improve our software; and, to perform back-office business functions related to accounting, billing, and auditing. Inntopia discloses your personal information to our travel suppliers with whom you have purchased lodging, activities, or other goods and services, and to third party agents and service providers acting on their behalf to process your order.

## USES OF PERSONAL INFORMATION BY INNTOPIA FOR INNTOPIA'S BUSINESS PURPOSES

If you elect to provide us personal information, we may use it as needed to deliver products and/or services to you. Inntopia may use personal information in a variety of ways to meet our obligations to you to provide you with a variety of services and products. These uses are based in our legitimate business interests in providing products and services to you and/or fulfillment of our contractual obligation to deliver products and services you have requested. We have balanced these business needs carefully with your privacy rights and these uses do not improperly infringe on your privacy and confidentiality rights. These business uses for your personal information include the following:

- a) Inntopia may combine information about you that we have with information we obtain from business partners or other companies in order to better deliver products and services that may be of interest and benefit to you.
- b) We may use your personal information for security, including analysis of the personal information to pursue our legitimate business interest in protecting our customers and website visitors against malware, cyber-attack and other crime and security risks.
- c) Inntopia may use personal information to contact users regarding renewal of subscriptions to Inntopia services and products and to send product announcements or special edition e-letters to online registrants.
- d) Inntopia may use personal information to send notification of Inntopia's or our partners' products and services by such methods as email and/or postal mail.
- e) We may aggregate and anonymize personal information provided under this Privacy Policy to create anonymized data sets which will then be used to improve our and our affiliates' products and services. We may also share aggregated anonymized personal information with clients, customers, prospective clients and customers or business partners in order to demonstrate usage of the services, or to identify industry and advertising trends.
- f) If you provide financial information, we use that information primarily to verify your credit card information and collect payments for your purchases, orders, subscriptions, etc.
- g) If you participate in a Inntopia educational program, webinar, virtual tradeshow, or other time-sensitive programs, we use personal information to contact you to remind you of upcoming deadlines or additional information concerning these programs.
- h) Inntopia occasionally conducts subscriber and/or user surveys to better target our content to our audiences. The aggregated information collected is anonymized (identifying information removed) and sometimes shared with our advertisers, however, we do not share specific individual information with third parties.
- i) Inntopia operates several websites featuring its travel-related content and services. Inntopia may share personal information collected from users of its websites internally across these websites to better serve its users by permitting us to reference services across our spectrum of offerings and point you toward the best products and services for your needs.
- j) We may share personal information where we have a good faith belief that such action is necessary to comply with a judicial proceeding, a court order, or legal process served on Inntopia, or to establish or exercise our legal rights or defend against legal claims.
- k) We may share such information where we have a good faith belief that it is necessary in order to investigate (or assist in the investigation of), prevent, or take action regarding illegal activities,

suspected fraud, cyber attack, situations involving potential threats to the physical safety of any person, violations of Inntopia's terms of use, or as otherwise required by law.

- l) If Inntopia is acquired by or merged with another company, we will transfer information about you to this other company in connection with the acquisition or merger.
- m) Inntopia has numerous products and services and therefore numerous email and promotion lists. In an effort to allow users to tailor their participation in Inntopia services and promotions, Inntopia provides users the ability to choose specific lists or products of interest and opt-out options are product and use/list specific. All email promotions sent from Inntopia provide an opt-out link at the bottom of the email pursuant to which users can opt-out of specific products and promotions. If you receive one of these emails and wish to object to this processing of your information or unsubscribe please follow the instructions given in each email or contact [privacy@inntopia.com](mailto:privacy@inntopia.com)

From time to time we may use customer information for new, unanticipated uses not previously disclosed in our Privacy Policy. If our information practices change at some time in the future, we will post the policy changes to our website.

**Right to object.** You may object to Inntopia using your personal information for the above purposes at any time by contacting [privacy@inntopia.com](mailto:privacy@inntopia.com) . If you do so, Inntopia will cease using your personal information for the above purposes (i.e., under a legitimate interest set out above) and remove it from its systems unless such personal information is permitted to be used by Inntopia for another purpose set out in this Privacy Policy or Inntopia determines and demonstrates a compelling legitimate interest to continue in processing your personal information.

## SHARING OF PERSONAL INFORMATION WITH THIRD PARTIES

In general, Inntopia does not rent, sell, or share personal information about you with other people or nonaffiliated companies except to provide products or services you have requested, when we have your consent as indicated in Section I of this Policy, as follows:

- a) Inntopia may use personal information collected through its website to send out targeted email promotions on behalf of its advertisers and industry partners.
- b) We may provide personal information about our users to trusted partners and vendors who work on behalf of or with Inntopia under written confidentiality and similar agreements prohibiting such parties' further use of the information. These companies may use your personal information to help Inntopia communicate with you about offers from Inntopia and our marketing partners. However, these companies do not have any independent right to use or share this information.
- c) When you register for an educational program, contest, event, virtual tradeshow or other promotion that is sponsored by a third party, your personal information will be provided to that third-party sponsor unless you are a resident of one of the countries within the European Union (EU). If you are an EU resident, we will seek your affirmative consent to provide the third-party sponsor with your personal information in a manner clearly specified on the registration materials, unless otherwise posted in connection with the promotion.
- d) Inntopia may from time to time share limited personal information such as email addresses, company name, job title and state of business or residence with trusted third parties who deliver content that is likely to be of interest to you.

## COOKIES

With your consent, the personal information that Inntopia may collect using cookies or other automated methods may include, for example, your IP address, cookie information, a unique device or user ID, browser type, system type, the content and pages that you access on the Inntopia websites, the frequency and duration of your visits to our website, the page from which you navigated to the Website. Inntopia may also use cookies to store session validators on your hard drive. On our website, Inntopia may use this passively collected data to:

- a) remember your information so that you will not have to re-enter it during you visit or the next time you visit our website.
- b) monitor your participation in various sections of our website.
- c) customize services to you.
- d) monitor website usage metrics such as total visitors and pages viewed
- e) administer, operate and improve our website and our other products and services, including those tailored to you.

For more information please see our [Cookie Policy](#)

## LEGAL BASIS

The legal basis for our uses, sharing and disclosures ("processing") of your personal information include, as pertinent, where:

- Necessary to perform the contractual obligations in agreements with you to provide products or services;
- You have consented to the processing as set out in this Policy, which consent you can revoke at any time;
- Necessary to comply with a legal obligation, a court order or to exercise or defend a legal claim;
- Necessary for the purposes of our or a third-party's legitimate business interests (so long as those interests do not override personal rights as indicated by law);
- You have expressly made your personal information public; and
- Necessary to protect your vital interests or other of others.

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- b) We may provide personal information about our users to trusted partners and vendors who work on behalf of or with Inntopia under written confidentiality and similar agreements prohibiting such parties' further use of the information. These companies may use your personal information to help Inntopia communicate with you about offers from Inntopia and our marketing partners. However, these companies do not have any independent right to use or share this information.
- c) When you register for an educational program, contest, event, virtual tradeshow or other promotion that is sponsored by a third party, your personal information will be provided to that

third-party sponsor unless you are a resident of one of the countries within the European Union (EU). If you are an EU resident, we will seek your affirmative consent to provide the third-party sponsor with your personal information in a manner clearly specified on the registration materials, unless otherwise posed in connection with the promotion.

- d) Inntopia may from time to time share limited personal information such as email addresses, company name, job title and state of business or residence with trusted third parties who deliver content that is likely to be of interest to you.

## FINANCIAL INFORMATION WE COLLECT OR RECEIVE

If you choose to purchase services, products or subscriptions we may collect credit card information, bank account information and information necessary to verify your identity, such as date of birth. In certain countries, national identifier numbers (like Social Security Numbers in the US) may also be collected or received if needed to verify your identity. We use commercially reasonable standards to protect this information. Depending upon your wishes, we may retain this information or arrange for it to be securely stored to facilitate your future purchases.

## CHOICE AND CONTROL

You may withdraw your consent or otherwise object to uses of your information as described above by contacting [privacy@inntopia.com](mailto:privacy@inntopia.com).

You may also withdraw your consent to email marketing by unsubscribing, using the unsubscribe link in such communications. If you do so, Inntopia will cease using your personal information for the above purposes and remove it from its systems unless such personal information is permitted to be used by Inntopia for another purpose set out in this Privacy Policy or Inntopia determines and demonstrates a compelling legitimate interest to continue in processing your personal information

In case of withdrawal of consent, Inntopia will not process your personal information subject to this consent any longer unless legally required to do so. In case Inntopia is required to retain your personal information for legal reasons your personal information will be restricted from further processing and only retained for the term required by law. However, any withdrawal has no effect on past processing of personal information by Inntopia up to the point in time of your withdrawal. Furthermore, if your use of an Inntopia offering requires your prior consent, Inntopia will not be (any longer) able to provide the relevant product, service, offer, or event to you after your withdrawal.

Please direct any such request for withdrawal to, or write to Inntopia at [privacy@inntopia.com](mailto:privacy@inntopia.com).

You can request from Inntopia, at any time, information about which personal information Inntopia processes about you and the correction or deletion of such personal information. If Inntopia uses your personal information to perform a contract with you, you may further request a copy of the personal data that you have provided to Inntopia.

To make such a request, please contact the email set forth below and specify in detail the information or the activity to which your request relates, the format in which you would like the personal data returned and the recipient, you or your designee. Furthermore, you may contact Inntopia if you believe that the personal information that Inntopia has is incorrect.

Depending upon your location, you may benefit from a number of rights with regard to your personal information that we process. These rights are defined and, in some cases limited, by the laws of your jurisdiction.

These rights include (a) data portability, including the right to obtain a copy of the personal information you have provided to Inntopia; (b) data correction (also known as rectification, including the ability to request correction or amendment of your personal information and (c) data deletion, including the right to have Inntopia delete your personal information except for information that we are required to retain.

You also have the right to have Inntopia cease processing your personal information is dependent upon the following events: (i) you state that the personal information Inntopia has about you is incorrect; but Inntopia may retain the information for as long as it requires to check the accuracy of the relevant personal information; (ii) there is no legal basis for Inntopia's processing of your personal information and you demand that Inntopia restrict your personal information from further processing, (iii) Inntopia no longer requires your personal information but you claim that you require such data in order to claim or exercise legal rights or to defend against third party claims; or (iv) in case you object to the processing of your personal information by Inntopia it may retain and process the information for as long as it is required to review as to whether Inntopia has a prevailing interest or legal obligation in continuing to process your personal information.

You may inquire about the exercise of these rights and, if the laws of your jurisdiction permit, exercise them as permitted by law by contacting [privacy@inntopia.com](mailto:privacy@inntopia.com).

## SECURITY

The security of your personal information is very important to us. We utilize commercially reasonable information security standards to protect your personal information from unauthorized access, use or disclosure. Inntopia supports online security using appropriately secure technology because we want your data to be safe. We bind our employees and data processors to written agreements to observe your privacy and confidentiality rights. Unfortunately, no method of internet transmission is one hundred percent secure. While we strive to protect your personal information, we cannot guarantee its security.

## DURATION AND RETENTION

Inntopia will retain your personal information only for as long as is necessary for the purposes set out in this Policy, or as required or permitted by law, and then will delete it as required by law. For example, Inntopia will retain your information as long as required to comply with applicable tax/revenue laws, cybersecurity and privacy laws, laws and regulations that affect the conduct of our business; to resolve disputes, enforce our agreements, cooperate with law enforcement requests or to meet other legal obligations. We may also retain log files for internal analysis purposes, though we would retain them for only a brief period except in cases where we are legally required to retain them for longer periods, and in cases where they are used for site safety and security or to improve website functionality.

## INTERNATIONAL TRANSFERS

Inntopia operates on a global basis. By using our products and services you understand and agree that your personal information may be transferred from the European Economic Area (EEA, which comprises the European Union countries plus Norway, Iceland, Liechtenstein) to a country that does not have an equivalent level of data protection, such as the United States. When your personal information is transferred from your home country to another country, the laws and regulations that protect your personal information may be different than those in your home country. In particular, if your information is in the US, it may be accessed by government authorities in accordance with US law.

To the extent that Inntopia is deemed to transfer your personal information outside the EEA, Inntopia relies upon data transfer agreements with Model Contract Clauses, which the European Commission has adopted to provide safeguards for personal information that is transferred outside the EEA. You may obtain a copy of the Model Clauses by contacting [compliance@inntopia.com](mailto:compliance@inntopia.com).

## ACCESS TO INFORMATION AND DISPUTE RESOLUTION

To access your information, ask questions about our privacy practices, or issue a complaint, please contact Inntopia at the address below. We will attempt to resolve any disputes or concerns regarding the sharing or handling of your personal information in accordance with the principles outlined in this policy. If we are unable to resolve disputes between Inntopia and the complainant, we have committed to participate in the dispute resolution procedures of the Federal Trade Commission and the European Data Protection Authorities to resolve disputes pursuant to the Safe Harbor Principles. For Human Resource data, Sterling Valley Systems, Inc will cooperate and comply with the Swiss Federal Data Protection and Information Commissioner (FDPIC).

### Contact Information

Inntopia Privacy Officer  
PO Box 309  
Stowe, VT  
05672  
Or by e-mail:  
[privacy@inntopia.com](mailto:privacy@inntopia.com)

**UPDATED OCTOBER 7, 2018**