

PRIVACY POLICY

1. Purpose. Your privacy is important to us. We are committed to respecting your privacy and recognize your need for appropriate safeguarding of any Personal Information you share with us. We have prepared this Privacy Policy to explain how Think Passenger, Inc. ("**Passenger**", "**we**" or "**us**") collects, uses and shares Personal Information we obtain from you when you use the Passenger website and/or participate in an online Community that Passenger conducts on behalf of its corporate clients (each a "**Passenger Client**") through a Passenger-hosted web site or mobile application (collectively, the "**Site**"). Your use of the Site may be subject to Passenger's or the Passenger Client's Terms and Conditions of Use. Because the Internet is global, Personal Information about you that we collect or that you submit may be transferred to, processed in, and held in countries (including the United States of America) other than the one in which you reside. **By using the Site, you explicitly consent to such use of your Personal Information and agree to the terms of this Privacy Policy.**

2. Passenger Client Privacy Policy. Please note that this Privacy Policy only governs Passenger's use of your Personal Information. The Passenger Client's use of your Personal Information is governed by the Passenger Client's own privacy practices and you should review the Passenger Client's Privacy Policy to understand its privacy practices. We are not responsible for the Passenger Client's privacy practices, or for any information contained on any web site (including the Passenger Client's web site) that may be accessed from the Site. This policy was last updated on January 19, 2015.

3. Non-Personally Identifiable Information. We automatically collect certain information from you when you visit the Site to help us understand how you use the Site (which we will refer to in this Privacy Policy collectively as "**Non- Personally Identifiable Information**"). For example, each time you visit the Site we may automatically collect your IP address, browser and computer type, access time, the web page from which you came, and the web page(s) that you

access during your visit. We also use cookies (which are small amounts of data sent from a web server to your browser that are stored on your computer's hard drive) to keep track of your use of the Site, to validate your identity, to remember your password and preferences, to tailor the Site to meet your personal interests, and to improve the quality of the Site. We do not link the information we store in cookies to any Personally Identifiable Information (as defined below) that you provide to us through the Site. Generally, you can set your browser not to accept cookies or to notify you if you are sent a cookie, giving you the opportunity to choose whether or not to accept the cookie. Please note that if you do set your browser not to accept cookies, certain areas of the Site may not function properly.

4. Personally Identifiable Information. You may have to register with Passenger to use the Site. As part of the registration process, you will be asked to provide certain information by which (either alone or in combination with other information provided by you) someone could personally identify you (which we will refer to in this Privacy Policy collectively as "**Personally Identifiable Information**"), including for example, your first and last names, your home address, your email address, your date of birth, etc. Each Passenger Client identifies the Personal Information that it wishes Passenger to obtain from you on its behalf. We collect your Personally Identifiable Information for the purposes of managing and monitoring your account and passing such Personally Identifiable Information to the relevant Passenger Client on whose behalf we have collected it. Each Passenger Client's use of your Personally Identifiable Information will be governed by their Privacy Policy.

5. Sensitive Personal Information. If we ask you to provide Sensitive Personal Information (i.e. information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information regarding your sex life), we will require that you affirmatively agree (opt-in) to provide such information, before we collect it from you. The information we request is not designed for any discriminatory

purpose and you are not required to provide such Sensitive Personal Information if you do not wish to do so.

6. Our Information Use and Sharing Practices.

(a) *Generally.* Except as otherwise described in this section of our Privacy Policy, we will never share your Non-Personally Identifiable information, Personally Identifiable Information and Sensitive Personal Information (which we will refer to in this Privacy Policy collectively as “**Personal Information**”) with any third party without your permission.

(b) *Passenger Client.* We provide some or all of your Personal Information to the particular Passenger Client on whose behalf we have collected your Personal Information through the Site, and such Passenger Client may contact you regarding goods or services in which you may be interested. We will not share your Personal Information with any other Passenger Client.

(c) *Aggregated Data.* We collect and use aggregated Personal Information in respect of users who use the Site for the purpose of enhancing users’ experiences using Passenger’s service, and providing feedback to Passenger Clients. From time to time, we may share aggregated Personal Information with third parties. However, we will not share any aggregated Personal Information in any manner that would enable the recipient to personally identify you.

(d) *Service Providers.* From time to time, we may enter into relationships with third parties who provide services to us (e.g., we outsource a portion of our electronic mailing to a third party). In those circumstances, we only disclose Personal Information that is necessary for such service providers to perform those services on our behalf, and we require that they maintain the confidentiality of such Personal Information.

(e) *Site Access/Improvement.* We may view, store and use Personal Information (i) to provide access to the Site and related services, (ii) to communicate with you concerning your account, and customer service issues, (iii) to personalize and improve the Site and related services, (iv) to ensure the technical functioning of the Site and related services, (v) to develop

new services, and (vi) to protect the copyright-protected content of our Site and related services.

(f) *Other Disclosure Scenarios.* Notwithstanding anything in this Privacy Policy to the contrary, we reserve the right, and you hereby expressly authorize us, to share or use any Personal Information: (1) in response to subpoenas, court orders, or legal process, or to establish, protect, or exercise our legal rights or defend against legal claims; (2) if we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, fraud, or situations involving potential threats to the safety of any person or property; (3) if we believe it is necessary to investigate, prevent, or take action regarding significant abuse of the Site's infrastructure or the Internet in general (such as voluminous spamming, denial of service attacks, or attempts to compromise the security of information); (4) to our parent company, subsidiaries, joint ventures, or other companies under common control with us (in which case we will require such entities to honor this Privacy Policy); and (5) if we are acquired by or merge with another entity.

7. Public Information. If you identify any Personal Information as public, you are authorizing us to share such information publicly. Also, there may be areas of the Site (e.g., message boards, discussion rooms, and other online forums) in which you are able to post information that will be available to all other users of the Site. By choosing to use these areas, you understand and agree that anyone may access, use, and disclose any information that you post to those areas.

8. Modifying and Deleting Your Personal Information. If you would like to modify or delete from our database, any Personal Information stored in your profile, or if you would like to delete your profile completely, you can do so as follows: log into the Passenger Client online Community and proceed to the "My Account" section where you have the ability to edit your information or close your account. We will implement these changes within ten (10) calendar days. Please note that any Personal Information that we have copied may remain in back-up storage for some period of time after your request. We will also be unable to recover any

Personal Information from any Passenger Client once it has been transferred to such client. Also, please note that we will maintain all Personal Information in our database whenever we are required to do so by law. We retain your Personal Information during the term of the particular project that we are conducting on behalf of the relevant Passenger Client, and for a period of sixty (60) calendar days after the termination of such project, but in no event longer than allowed by applicable law.

9. Security. We implement reasonable industry-standard security technologies and procedures measures to help protect your Personal Information from loss, misuse, unauthorized access, alteration, destruction, seizure, theft or disclosure. Unfortunately, however, no data transmission over the Internet can be guaranteed to be one hundred percent secure. As a result, while we strive to protect your Personal Information, we cannot guarantee its security. In addition, Passenger is unable to control how other user will utilize the information you share with them. Passenger disclaims any responsibility for the sale, misuse or dissemination of any information you share with other users or third parties. To that end, we ask that you not share any sensitive personal information about yourself or other contacts through the Site or related services.

10. Children's Privacy. We are committed to protecting the privacy needs of children and we encourage parents and guardians to take an active role in their children's online activities and interests. The Site is not intended for and may not be used by children under the age of 13. We do not knowingly collect information from children under the age of 13 and we do not target the Site to children under the age of 13.

11. Changes. We may update this Privacy Policy from time to time. If under any such update we make any material change to the way in which we treat your Personal Information, we will inform you by posting a notice on relevant areas of the Site. Any updated version of this Privacy Policy will be effective as of the date set forth therein.

12. Safe Harbor Program. Passenger complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Passenger has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Passenger's certification, please visit <http://www.export.gov/safeharbor/>. As part of our participation in the Safe Harbor Program, we have agreed to use the Direct Marketing Association (DMA) dispute resolution for disputes relating to our compliance with the Safe Harbor Program. If you have any complaints regarding our compliance with the Safe Harbor Program you should first contact us as set forth below. If contacting us does not resolve your complaint, you may raise your complaint with DMA through email at safeharbor@the-dma.org, by phone at (202) 861-2410, by fax at (202) 955-0085, or by mail at Safe Harbor Line, Direct Marketing Association, 1615 L Street, NW – Suite 1100, Washington, DC 20036, USA. DMA will then serve as a liaison with us to resolve your concerns.

13. Non-Solicited Communications. Except to the extent otherwise required to comply with the Safe Harbor Program, this Privacy Policy does not govern our use of any information you provide to us when you call us, write to us, or communicate with us in any manner other than through the Site.

14. Links. Passenger may display links to third party websites. Please note that we cannot control and cannot be held responsible for the privacy policies of such websites. You should always read the privacy policy of a website to find out more about how personal information is collected and processed

15. Questions. If you have any questions about this Privacy Policy, please feel free to contact us as follows:

Think Passenger, Inc.

12100 Wilshire Boulevard, Suite 1950

Los Angeles, CA 90025

Tel: (323) 556-5400