

PRIVACY POLICY

This Privacy and Security Policy ("Policy") explains how your personal information will be treated by FC USA Inc dba Independent by Liberty Travel or any of our affiliates ("we" "our" or "us"). We are firmly committed to protecting the privacy and confidentiality of personal information and we maintain robust physical, electronic and procedural safeguards to protect personal information in our care. We reserve the right to amend this Policy at any time. Your continued use of our services or those on <https://www.independentlt.com/> ("Website") following such modification will be conclusively deemed acceptance by you of any changes to this Policy. The term "Third Party" used in this Policy means any entity other than us.

Collection of personal information from site users of our Website

Where practical we will collect personal information directly from you. Generally this will be collected by us when you deal with us either in person, by telephone, letter, facsimile, email or when you visit our Website. Without limitation, we may collect your personal information as follows:

A) We collect and/or track (1) the home server domain names, e-mail addresses, IP addresses, type of computer, and type of web browser of visitors to the Website, (2) the e-mail addresses of visitors that communicate with us or the Website via e-mail, (3) information knowingly provided by the visitor in online forms (including travel preferences, such as seat selection, meal requests, frequent flyer/hotel/car rental program information, and ticketing options), registration forms, surveys, and contest entries (including name, address, e-mail and other personal profile data), (4) aggregate and user-specific information regarding page views and other online activities, and (5) other information gathered through our weblogs or other interactive forums. You can choose not to provide information to us, but in general some information about you is required in order for you to utilize the Website and/or to purchase products or services; complete a traveler profile; participate in a survey, contest, or sweepstakes; or initiate other transactions on the Website. When you make travel or other arrangements for someone else through the Website, we will request personal information and travel preferences about that individual. You should obtain the consent of other individuals prior to providing us with their personal information and travel preferences.

B) Cookies Information: We may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us learn about your behavior and usage patterns when you are on our Service. A cookie may also convey anonymous information about how you browse a partner website to us. A cookie does not collect personal information about you. A persistent cookie remains on your hard drive after you close your browser. Persistent cookies may be used by your browser on subsequent visits to the Service. Persistent cookies can be removed by following your web browser's directions. A session cookie is temporary and disappears after you close your browser. You can reset your web browser to refuse all cookies or to indicate when a cookie is being sent.

C) When a visitor performs a search within the Website, we may record information identifying the visitor or linking the visitor to the search performed. We may also record limited information associated with every search request made by the visitor and use that information to, among other things, solve technical problems with the service and to calculate overall usage statistics.

We are required by law to obtain your consent to the collection of sensitive information. We will assume that you have consented to the collection of all information which is provided to us for use in accordance with this Policy, unless you tell us otherwise.

Use of personal information collected

We will only collect personal information that is relevant for the purposes for which it is to be used. We will take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current. We may use personally identifiable information in a number of ways, such as:

A) To communicate with you about your account, or to communicate information about the Website.

B) To build higher quality, more useful services such as by analyzing usage trends, and by measuring demographics and interests regarding specific areas of the Website.

C) To provide you with prompt and effective customer service.

D) To support the operation of the Website (such as account maintenance and record keeping), troubleshoot problems, resolve disputes, and to enforce our terms and conditions.

E) To inform you about our services.

F) Ancillary purpose such as any one or more of the following purposes:

- Identification of fraud or error;
- Regulatory reporting and compliance;
- Developing, improving and marketing our products and services;
- Servicing our relationship with you by, among other things, providing updates on promotions and services we think may interest you;
- Involving you in market research gauging customer satisfaction and seeking feedback regarding our relationship with you;
- To facilitate your participation in loyalty programs;
- To analyze trends in sales and travel destinations;
- For marketing activities; and
- Internal accounting and administration.

Disclosure of personal information to Third Parties

We may disclose personally identifiable information about you to Third Parties as follows:

A) With your consent.

B) To facilitate a transaction or communication with a Third Party that you have initiated.

C) To our agents and advisors (such as our accountants or attorneys). We only disclose the personal information necessary for them to provide their services to you or to us, and only under strict confidentiality restrictions.

D) As we believe necessary to: (1) comply with law (including court and government orders, and civil subpoenas); (2) enforce or apply our terms and conditions and rules and regulations and other agreements; or (3) protect the rights, property, or safety of our users, or others.

E) If you partake (or we reasonably suspect that you are partaking) in any illegal or potentially illegal activity. We may disclose personal information even without a subpoena, warrant, or other court order, to the extent we feel is necessary to inform and cooperate with law enforcement agencies or other appropriate authorities.

F) In aggregated form, i.e., information about multiple users collectively without identifying any individual user, such as the total number of visitors to the Website in a given week.

G) Due to circumstances beyond our control. We shall take reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the personal information from loss, misuse, unauthorized access or disclosure, alteration, or destruction. Despite the precautions we take to protect your personal information, the unfortunate fact is that there is simply no such thing as a perfect security system. Also, we have 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 Policy.

H) In connection with a transfer, reorganization or otherwise, to a successor-in-interest to our organization or its other material assets. When a Third Party acts as our agent, we will ensure that the Third Party is willing to enter into a written agreement requiring the Third Party to provide at least the same level of privacy protection as is required by the relevant principles.

Trans-Border data flows

In providing our services to you it may be necessary for us to forward personal information to relevant overseas Third Party service providers or our affiliates, licensees overseas. Please let us know if you have any objections to such transfers.

Security of information

We have implemented appropriate physical, electronic and managerial security

procedures in order to protect personal information from loss, misuse, alteration or destruction. We uses advanced technology to ensure security on all data transmitted via the Website. Secure Sockets Layer (SSL) technology is used to transmit all data between browsers and our web server where applicable.

Opt-out

Visitors may opt-out of having their personal information collected or used by us for secondary purposes, or used by us to send promotional correspondence to the visitor, by us via email at: operations@indpeentdentlt.com.

To the extent you choose to continue using the Website, however, we may use your personal information as may be reasonably necessary in connection with such use. For sensitive information (other than for the sensitive information to be used purpose for which it was provided), we will give you affirmative or explicit (opt in) choice if the information is to be disclosed to a Third Party or used for a purpose other than those for which it was originally collected or subsequently authorized.

Third Party sites and cookies

Our partners, affiliates, and service providers use cookies to: (a) monitor the effectiveness of our website and the offerings of our partners; (b) monitor aggregate metrics such as total number of visitors, traffic, and demographic patterns; (c) and allow our business partners to deliver advertisements to you as described below.

Access to and ability to correct personal information

Upon request via postal mail or e-mail, we will, within a reasonable time period, provide to visitors a summary of any personally identifiable information retained by us regarding the visitor, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated. Visitors may modify, correct, change or update personally identifiable information that we have collected through the Website or may cause their personal record to be removed from our database, except where the burden or expense of providing these services would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated, by contacting us via postal mail or e-mail indicated below.

Feedback and complaints

We welcome your inquiries or comments about our Policy. Should you have any comments or complaints please contact us at operations@indpeentdentlt.com. We will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information in accordance with this Policy.

Ads

We use Remarketing with Google Analytics to advertise online. In connection with this advertising, we, along with third-party business partners, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick

cookie) to allow our third-party business partners, including Google, ad servers, and ad networks, to serve you advertisements (“ads”) based on your prior visits to our Service. These ads are delivered to you on third-party websites and services across the Internet. These third-party business partners use technology to send, directly to your browser or mobile device, the ads and ad links that appear on third-party sites, and will automatically receive your IP address when they do so.

Along with cookies, they may also use other technologies (such as JavaScript, device identifiers, location data, and clear gifs, see above) to compile information about your browser’s or device’s visits and usage patterns on the Service, and to measure the effectiveness of their ads and to optimize and personalize the advertising content. Independent by Liberty Travel does not sell, rent, or share the information we collect directly from you or about you from third parties with these third-party business partners for such parties’ own marketing purposes. You may opt out of the DoubleClick cookie by visiting the Google advertising opt-out page or you may opt out of Google Analytics by visiting the Google Analytics opt-out page. Google has additional information available about their Remarketing Privacy Guidelines, Policies, and Restrictions.