

RCI Safe Harbor Policy

Effective Date: October 11, 2012

Introduction.

RCI, LLC, formerly known as Resort Condominiums International, LLC (referred to as “RCI”, “we,” “us,” or “our”), believes in protecting your privacy.

When we collect Personal Information (as defined below) from you, we adhere to 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. Accordingly, we follow the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access and enforcement (collectively, the “Principles”). To learn more about the Safe Harbor program, please visit <http://www.export.gov/safeharbor/>. We are currently in the process of obtaining formal self-certification of our adherence to both the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework.

When we use the term “Personal Information” in this RCI Safe Harbor Policy (the “Policy”), we are referring to any information that (i) is recorded in any form; (ii) is about or is related to a specific individual; (iii) can be linked to that individual; and (iv) is transferred by us from the EU and Switzerland to the U.S.

When we use the term “Sensitive Personal Information” in this Policy, we are referring to a particular subset of an individual’s Personal Information that provides details of his or her race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns his or her health.

The purpose of this Policy is to outline our general practices for implementing the Principles with respect to the Personal Information we collect. If you would like to obtain additional information regarding our privacy practices in connection with information collected on this website in general, please refer to the RCI Privacy Policy, which is available at http://www.rci.com/docs/KnowledgeBase/Documents/en_US/Privacy.pdf.

Principles.

1. Notice. When we collect your Personal Information, we will give you timely and appropriate notice describing what Personal Information we are collecting, how we will use that information and the types of third parties with whom we may share such information.

2. Choice. We will offer you the opportunity to opt-out of your Personal Information (or explicitly consent for Sensitive Personal Information) being: (i) disclosed to a third party (other than a service provider as set forth below); or (ii) used for a purpose other than the purpose for which it was originally collected (or subsequently authorized by you).

Notwithstanding the foregoing, we may disclose Personal Information under the following circumstances without offering you an opportunity to opt out of such disclosure: (i) to our service providers that we have retained to perform requested services on our behalf; (ii) if we are required to do so by law or legal process; (iii) pursuant to valid requests by law enforcement or other government authorities; and (iv) when we believe disclosure is necessary to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. In addition, we reserve the right to transfer Personal Information in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation). Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use the Personal Information in a manner consistent with this Policy.

3. Onward Transfers (Transfer to Third Parties). We will only transfer Personal Information to third parties where the third party: (i) has provided satisfactory assurances to us that it will protect the Personal Information in accordance with this Policy and the substance of the Principles; (ii) is located in the EU, Switzerland or a country considered “adequate” for privacy by the EU Commission and/or the Federal Data Protection and Information Commissioner of Switzerland, and therefore is required to comply with the EU or Swiss data protection laws or substantially equivalent privacy laws; or (iii) has certified to the Safe Harbor, and is accordingly independently responsible for complying with the Safe Harbor requirements.

Where we have knowledge that a third party to whom we have provided Personal Information is processing that Personal Information in a manner contrary to this Policy or the Principles, we will take reasonable steps to prevent or terminate processing by the third party until such time the third party can process Personal Information in compliance with this Policy and the Principles.

4. Data Security. We will take reasonable steps to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have implemented appropriate physical, electronic and managerial procedures to help safeguard and secure Personal Information from loss, misuse, unauthorized access or disclosure, alteration or destruction.

5. Data Integrity. We will process Personal Information in a manner that is compatible with and relevant to the purpose for which it was collected or authorized by you. To the extent necessary for those purposes, we will take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

6. Access. Upon request, we will provide you with reasonable access to the Personal Information about you that we hold. We will also take reasonable steps to correct, update, amend or delete any information that is demonstrated to be inaccurate, except where the burden or expense of doing so would be disproportionate to the risks to your privacy in the case in question or where the rights of third parties would be violated.

7. Enforcement. We will regularly review our compliance with the statements set forth in this Policy, and we will provide an independent way to resolve complaints about our privacy practices. We encourage interested persons to Contact Us (contact information provided below)

and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of Personal Information in accordance with the Principles.

We also participate in the International Centre for Dispute Resolution (“ICDR”), a division of the American Arbitration Association’s (www.adr.org), Dispute Resolution Process. If your inquiry is not satisfactorily addressed by us, you may contact the ICDR.

Modifications.

We may amend this Policy from time-to-time in accordance with the requirements of the U.S.–EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework. The most recent version of the Policy will always be posted to this website. Anytime that we do make such changes, we will also update the Effective Date listed at the beginning of the Policy. Please be sure to review the most recent version of the Policy each time that you visit this website so that you are aware of how we collect, use and retain personal information.

Contact Us.

To understand more about the transfer of your Personal Information from the EU or Switzerland to the US, access your information, ask questions about our privacy practices or issue a complaint, please contact us at:

RCI, LLC
Address: 9998 North Michigan Road, Carmel, IN 46032
Attn: Customer Service – Privacy
Phone: **RCI Weeks:** 1-317-805-8000 or 1-800-338-7777
RCI Points: 1-317-805-9941 or 1-877-968-7476
E-mail: feedback@rci.com