

Bluetent's Privacy Policy

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Overview

This Privacy Policy states what Bluetent will and will not do with personal data collected by Bluetent or provided to Bluetent by Property Management or other entities ("Organizations") or by individuals ("Users") interacting with our website hosted on the domains bluetent.com or rezfusion.com, or Bluetent's Services (collectively referred to as "Services"). Please read this Policy carefully to understand our policies and practices.

Personal data includes any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier and includes, without limitation, personally identifiable information.

This Policy does not apply to any third party site or service linked to our website or recommended or referred to by our website, the Bluetent Services or by our staff. For example, YouTube hosts our videos. YouTube's privacy policy will govern your processing when you view any of the videos available from our website.

If You Do Not Agree With Our Policy

If you do not agree with our policies and practices, your choice is to not use our Services. ***By accessing or using the Services, you agree to this Policy.***

Personal Data We Collect

We collect personal data from you in several ways while we market Bluetent Services, interact with our customers, and provide Bluetent Services. You provide us with personal data when you ask to learn more about our products and services, request a demo or evaluation, sign up for newsletters, enter promotions, interact with us on our social media channels, order products or services, talk with us on the phone, request white papers, watch training videos, sign up for or attend events, trade shows or seminars. We may collect personal data from you when you register for, download, access, and submit information to the Bluetent Services and otherwise use our Services. We collect certain information automatically as you interact with our Services, and when you provide comments and suggestions, or send us feedback request and use maintenance and support services. We may get information about you from Organizations or collect information about you on behalf of organizations that use our services. If you do not want us to collect this personal data directly from you, please do not provide it.

1. Direct collection of personal data: We directly collect the following personal data:

Consumer personal data: We collect and process personal data about Consumers (e.g., property guests and potential guests) on behalf of Organizations when interacting with Bluetent Services to provide information about rentals and/or reservations.

User personal data: We collect personal data about users who are tasked by Organizations to interact with Bluetent and who have account login credentials to access our Bluetent Services. These users use our Services on behalf of their Organizations and communicate with Bluetent for business purposes, including without limitation billing, payment and support. Examples of User personal data include, but are not limited to, name, login user names, passwords, organization name, address, phone numbers, Organization details (e.g., Organization name, address, phone number, website address, application information and billing information), organizational role, system information, application information, and other information used to access all or part of the Bluetent Services or to contact Bluetent about its contracted for products or services or need for support and when requesting information about the status of the Bluetent Services. We also collect personal data of people who attend events in which Bluetent participates, including industry events such as trade shows and seminars.

Bluetent Business personal data: This means business-contact personal data which is not Consumer or User personal data, such as name, title, job function, business name, business address, business e-mail address, and business phone number that we collect about people we serve or work with, including actual and prospective customers, alliance and channel partners, contractors, vendors and other parties interested in Bluetent or its products and services. This includes visitors to our website, individuals who fill in forms requesting us to contact them, individuals who attend any events where we demonstrate our Services and other individuals with whom we interact for business purposes, including without limitation marketing. We also purchase information about potential leads from third parties and we may use publicly available personal data.

2. Information We Automatically Collect from You When You Use the Services. The personal data we collect automatically is statistical information and may include personal data, or we may maintain it or associate it with personal data we collect in other ways or receive from third parties. If you do not want us to collect this personal data, please do not use the Services.

Information collected through our cookies, web beacons and other tracking technologies. Bluetent, or service providers on our behalf, may use technologies, including “cookies,” “web beacons” and other tracking technologies to automatically collect personal data from you when you use the Services. We collect this personal data to, among other things, improve our Services and your experience, see which areas and features of our Services are popular and count visits. We use these cookies and tracking technologies to analyze trends,

administer the Bluetent website and Service, track users' movements around website and Service, to gather demographic information about our user base as a whole, to remember users' settings and for authentication purposes. Cookies are small amounts of data that are stored within your Internet browser, which saves and recognizes your browsing habits. Bluetent uses both session cookies (which track a user's progression during one site visit) and persistent cookies (which track a user over time). Web beacons (also called pixel tags or clear GIFs) are web page elements that can help deliver cookies, count visits, track browser type, identify your IP address, understand usage and marketing campaign effectiveness, recognize certain types of information on your computer, in your email or on your mobile device, such as the time and date you viewed a page, which emails are opened, which links are clicked, and similar information.

Log files. As is true of most websites, we gather certain personal data automatically and store it in log files. This personal data may include internet protocol (IP) addresses and usage data such as browser type, browser language, device identifier, Internet service provider (ISP), referring/exit pages, length of visit, pages viewed, operating system, date/time stamp, clickstream data, crashes, system activity, hardware settings, the date and time of requests, referral URL and other usage data. We may combine this automatically-collected log information with other information we collect about you. If you reach out to us over the telephone, facsimile, email, our contact form on our website or via any other mechanism, we may also log telephony information such as your phone number, forwarding calls, SMS routing information and types of calls and other details of your communications to us for us to respond to your questions, improve our products and services and to develop new products and services.

How We Use Your Personal Data

We may use personal data collected from or about you for any of the following purposes:

Consumer personal data: Bluetent uses Consumer personal data to provide the Bluetent Services requested by Consumers and/or contracted for by Organizations, including transmitting Consumer personal data from Bluetent software to applications used by the Organization. We also use Consumer information to provide marketing support for Organizations.

For example, a reservation requested by a Consumer on the Bluetent platform may cause Consumer personal data be transmitted to a reservation management system of a Hotel to finalize the reservation and enable the Hotel to provide services to the Consumer. Consumer payment information is transmitted to a payment gateway provider to process payments.

To respond to your requests or to tailor content. We may use your personal data to respond to your requests or the requests of Organizations and Users, which may include processing orders, sending confirmations, providing invoices, responding to requests for information about our products and services, assisting you in downloading whitepapers or product demonstrations or evaluations. We may also use your personal data to customize your interaction with our website and our Services and to provide you with more relevant information regarding our products or services.

To provide Services to you. We may communicate with you about our Services. These may include reports, consulting, services (including without limitation education, training, maintenance and support) for which you have inquired or contracted. For instance, as part of support services, our technical staff may require periodic access to services data to troubleshoot or monitor your system. We may provide technical support and related product information via our website or a customer support portal. We may require access to your systems to implement our Services. Any temporary copies of data accessed, used or created as a necessary part of these services are only maintained for time periods relevant to those purposes. As part of these services, we may be required to remotely access your systems or an individual computer to troubleshoot a support issue or have direct physical access as part of an onsite engagement. We may also use this data to provide you service and product updates and notices. We may keep a record of your communications and ours to provide improved customer service to you and others. We also share information with our third party payment processor.

To provide informational services. We may use personal data while providing online forums such as user groups and bulletin boards, including communications through social media. We may also do so while delivering live or online events such as training seminars or conferences, including third-party events sponsored by Bluetent.

Prevent improper or illegal activity. We may use personal data to protect, investigate and deter against fraudulent, unauthorized or illegal activity.

To meet legal requirements. Bluetent may be required to provide personal data to comply with legally mandated reporting, subpoenas, court orders, or other legal process requirements.

To market and improve our products and services and to create new products and services. We may inform you about our products, services, events, promotions and otherwise perform marketing activities. Further, we may use personal data for analytics purposes and to operate, maintain and improve our products and services. We may also use personal data to create new products and services.

Verify users. We may use personal data to manage and verify your account and the identity of consumers and users of the Services, which can include using social media services.

Contests and rewards. We may use personal data to process contest entries and deliver rewards.

Other purposes. We may use personal data for any other legal, business or marketing purposes that are not inconsistent with the terms of this Policy.

Lawful Basis if Subject to GDPR

If our processing of your information is subject to the General Data Protection Regulation 2016/679 (“GDPR”), we use your information according to the following lawful bases for processing. However, it should be noted that these are examples of processing under lawful

basis , not an exhaustive list of processing under lawful basis and do not limit any current, past or future processing under lawful basis that we may use to process your information if subject to the GDPR.

Pursuant to a Contract. We will use your information when it is necessary for us to perform a contract we are about to enter into or have entered into with you, including without limitation when we respond to your requests about entering into a contractual relationship, to help you create an account, to process your orders, to manage our relationship with you, to transfer your data to complete a reservation at a property, to help you participate in and to process your contest or sweepstakes entry or pay a reward.

Pursuant to a Legal Obligation. We will use your information where needed to comply with a legal or regulatory obligation, including without limitation to manage our relationship with you by providing this Notice and any changes and updates thereto.

Pursuant to a Legitimate Interest. We will use your information where necessary for our legitimate interests or those of a third party's, and your interests and fundamental rights do not override those interests, including without limitation to process and deliver your orders, to manage our relationship with you, to enable you to participate in a contest, sweepstakes, reward or prize, to administer and protect our business and our Services, to deliver the Services, content and advertisements to you and to evaluate the effectiveness of the Services, content and advertising, to tailor the Services, content and advertising, to use data analytics and other automated processing to evaluate and improve the Services and to make recommendations to you. We will also use your information where necessary to prevent fraud. We will also use your information where necessary to respond to your requests. For example, if you request to delete your information from our database, we may continue to use your information to respect your request and prevent further use of the account. This can include deactivating your account by removing your username from the permitted usernames and disallow any account creation under your email address.

Pursuant to Consent. We will use your information when we have provided you with notice of processing and obtained your consent in a manner compliant with the requirements set forth in GDPR, including without limitation allowing you to opt-in and opt-out of our marketing our Services to you.

Pursuant to One or More Lawful Basis. We may rely on more than one lawful basis for processing your specific information described in Section 1 of this Policy for the uses set forth above. To our knowledge, we do not process special category data or criminal offence data, and we require you to refrain from providing any such data in the information you share with us. Please contact us if you have any questions about the specific lawful basis we are relying on to process your information.

“Do not track” requests

Your Internet browser and mobile device may allow you to adjust your browser settings so that “do not track” requests are sent to the websites you visit. We do not process “do not track” (DNT) signals. Our third party service providers may also not respond to DNT signals.

How we share your personal data with third parties

As Directed by Organizations. Bluetent’s Services are used to assist Organizations in transferring data between software applications (such as between a Consumer and a Property Owner). Bluetent will transfer Consumer personal data provided to Bluetent by an Organization, its Users or third parties providing software or services to the Organization either to the Organization or to third party entities solely at the direction of the Organization and its Users. Organizations and its Users may use a feature of Bluetent’s Services that involves a third party, which may result in the transmission of Consumer personal data to that third party. (A very common example is when an Organization uses Bluetent to automatically provision such Information into an reservation software system hosted by a third party company.) Users and Organizations should carefully consider the privacy policy and practices of such third parties before using such a feature and instructing Bluetent to transfer the Consumer personal data. It is the responsibility of the Organization to enter into contractual arrangements to comply with all applicable privacy and data security laws and to ensure that the third party provides appropriate privacy and data security protections.

Business Partners and Subcontractors. Bluetent may disclose personal data to business partners and subcontractors (such as third-party distributors and resellers, vendors, suppliers and other service providers), who may use the information solely at Bluetent’s direction, including without limitation to fulfill product orders, develop and improve products, contact you about product orders or in connection with the performance, operation, and support of the Services or solutions, performing marketing or consulting services, or as otherwise appropriate in connection with a legitimate business need. For example, Bluetent currently works with service providers for cloud computing, online contracts, project management, data storage, data management, email marketing, search engine optimization and related services among others. Further, we may disclose personal data to service providers who host or facilitate the delivery of online training, seminars and webinars; email-delivery services and other technology providers; and third parties that may assist in the delivery of marketing materials, technical support services, or other products, services or other information. These companies are authorized to use your personal data only as necessary to provide these services.

Third Party Analytics Providers. Bluetent may disclose Consumer, User and Bluetent Business personal data to third parties who conduct marketing studies and data analytics, including those that provide tools or code which facilitates our review and management of our Services, such as Google Analytics or similar software products from other providers. For example, we use Google Analytics to analyze site traffic to our website. For more information about how Google collects and processes data when you visit websites or use apps that use

Google technologies, please see “How Google uses data when you use our partners' sites or apps” at www.google.com/policies/privacy/partners.

Transfer or Assignment in Connection with Business Transfers or Bankruptcy. In the event of a merger, acquisition, reorganization, bankruptcy or other sale of all or a portion of our assets, any user information owned or controlled by us may be one of the assets transferred to third parties. We reserve the right, as part of this type of transaction, to transfer or assign your personal data and other information we have collected from users of the Services to third parties. Other than to the extent ordered by a bankruptcy or other court, or as otherwise agreed to by you, the use and disclosure of all transferred user information will be subject to this Policy. However, any information you submit or that is collected after this type of transfer may be subject to a new privacy policy adopted by the successor entity.

Response to Subpoenas or Court Orders; Protection of Our Rights; Safety. As required or permitted by law, regulation, legal process or other legal requirement, or when we believe in our sole discretion that disclosure is necessary or appropriate, to respond to an emergency or to protect our rights, protect your safety or the safety of others, investigate fraud, comply with a judicial proceeding or subpoenas, court order, law-enforcement or government request, including without limitation to meet national security or law enforcement requirements, or other legal process and to enforce our agreements, policies and terms of use.

Publicly Posted Content. If you post comments, images, and other content on our social media pages or any other location widely available, that information will be publicly viewable.

With Your Consent. We may share some or all of your information to any other third party with your affirmative consent. For instance, we may display personal testimonials of satisfied customers. With your consent we may post your testimonial along with your name. Of course, if you wish to update or delete your testimonial, you may contact us at privacy@bluetent.com.

Preferences and opting out

If your personal data is Consumer personal data, please contact the applicable Organization with your preferences and to opt out of any data processing. With respect to User personal data, if you have an account you may terminate your account or opt out of marketing communications. Visitors to our website and individuals to whom we market our Service may request to opt-out of receiving specific types of communications from us at the point where we request information to send you the communication or contained within the communication itself. If you have previously signed up to receive information about our Services, you may unsubscribe or opt out of all future marketing communications from us that do not relate to products or services you have already ordered by (a) sending an email to privacy@bluetent.com; or (b) clicking the unsubscribe link on any email marketing communication you receive.

We partner with a third party to manage our advertising on other sites. Our third party partner may use cookies or similar technologies to provide you advertising based upon your browsing

activities and interests. Most Internet browsers allow you to block or delete cookies from your browser. If you do not agree to the use of these cookies, please disable or delete them by following the instructions for your browser set out here: <http://www.allaboutcookies.org/>, or use automated disabling tools where available. You can generally opt-out of receiving personalized ads from third party advertisers and ad networks who are members of the Network Advertising Initiative (NAI) (<https://www.networkadvertising.org/choices/>) or who follow the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising (<https://www.aboutads.info/choices/>) by visiting the opt-out pages on the NAI website and DAA website. Please note this does not opt you out of being served advertising. You will continue to receive generic ads. You can also delete cookie files from your hard drive, or avoid them altogether, by configuring your browser to reject them or to notify you when a cookie is being placed on your hard drive. Not all features of the Services will function as intended if you reject cookies.

Accessing / correcting / updating / transferring / restricting / removing and retaining your personal data

Upon request, Bluetent will provide you with information about whether we hold any of your personal data. We will respond to any request to access your personal data within 30 days. You have the right to access your personal data and to correct, amend, or delete such personal data if it is inaccurate (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to your privacy or the rights of other persons).

If you have an account with Bluetent, you can access, correct, update, or request deletion of your personal data accessible at one of our accounts by logging into your account or contacting support through Bluetent Support (<https://support.bluetent.com/>). If we communicate with you for marketing purposes, you may use the unsubscribe link in any email communication to ask us to discontinue emailing you for marketing purposes. Other requests for access, correction, amendment, restriction on use or deletion should be sent to privacy@bluetent.com. If your personal data is information provided to us by an Organization, you should direct your requests or questions about processing of personal data to the Organization. If you contact us directly about Consumer personal data, we will communicate to you and request you to directly contact the applicable Organization.

Bluetent supports access to and correction of Consumer personal data by the Organization using Bluetent's standard update mechanisms. The affected individual, including without limitation, must provide such changes to the Organization, and the Organization will have access to the Bluetent update mechanisms. Bluetent does assist its Organizations in transferring data from one software application to another software application and may use the data provided to transform the data from one software application as necessary to work with the other software application.

We will retain Consumer personal data we process on behalf of Organizations as instructed under our agreements with each Organization. Once an Organization has requested that we process your personal data and send it to a third party software application, we immediately process it and cannot delete it from the third party software application. We retain User personal data for ninety (90) days post termination of an account or last use of an account. We retain Business personal data so long as it is necessary to fulfil the purposes for which it was collected and to comply with applicable law or regulations.

We will retain and use all personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. If you delete any account information, we may retain certain information as required by law or for legitimate business purposes. If your account becomes inactive, or if we close or suspend your account, we will continue to adhere to the then current Policy when we collected your personal data so long as we retain it in our databases. We may delete any or all of your personal data at any time without notice to you for any reason or no reason unless otherwise required by law or contract to retain it.

Data Security

Bluetent takes commercially reasonable and appropriate measures to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into due account the risks involved in the processing and the nature of the personal data.

Organizations use Bluetent's Services to transmit personal data between software applications used by the Organization. This personal data will include Consumer personal data. Bluetent will only transmit data to and receive data from systems that have been authorized by the Organization. Bluetent has no ability to control the security of Consumer personal data in another entity's system, including without limitation any Organization which provides us with your personal data or any provider of a software application with whom we process your personal data at the direction of an Organization.

User names and passwords are used as credentials for Users and Bluetent employees with a need and proper authorization to access the Bluetent Services. When using Bluetent Services to share Consumer personal data between software applications, we encrypt the transmissions. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee its absolute security. If you have any questions about our security, you can contact us at privacy@bluetent.com.

Credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway providers database only to be accessible by those authorized with special access rights to such systems, and are required to keep the information confidential.

In the event that any Personal Information under our control is compromised as a result of a breach of security, Bluetent will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised or notify

the company responsible for the personal data of those individuals and take other action in accordance with any applicable laws and regulations. Bluetent's preference is an email notification of a breach.

California privacy

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal data by Bluetent to a third party for the third party's direct marketing purposes. To make such a request, please send an email to privacy@bluetent.com or write us:

Blue Tent Marketing LLC
Attn: Privacy
218 East Valley Road, Ste. 205
Carbondale, CO 81623

Email: privacy@bluetent.com

No use by children

We do not knowingly collect User or Bluetent Business personal data directly from children under the age of 16 without verifiable parental consent. We assume Users are 16 or over since they are employees of Properties, renting as a guest of Properties, or are companies. If we become aware that we have collected User or Bluetent Business personal data from an individual under the age of 16 without verifiable parental consent, we will remove his or her information from our files. If there is a concern about our processing of Consumer personal data of child under the age of 16, please directly contact the Organization as we are providing our services at their instruction and their privacy policy would govern such processing.

Requirement For Providing Bluetent Information About Others

If you provide any other individual's personal data to Bluetent, we will process the personal data to fulfill the purpose that you provided it to us. You agree that you are responsible for providing any notices and obtaining any consents required by applicable law necessary for Bluetent to access, and use, process, and disclose that personal data for the purposes you provided Bluetent with the data.

Updates to this Policy

This Policy may change from time to time. Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates. If a policy change affects how we use Consumer personal data, or User Information, we will first notify Organizations and Users according to the email or similar electronic contact information we have on file before any changes take effect. Privacy Policy changes will also be posted on this page.

Contacting Us About Privacy

If you have a specific privacy question or complaint or you want to object to or restrict any processing of your information, please contact us at:

Blue Tent Marketing LLC
Attn: Privacy
218 East Valley Road, Ste. 205
Carbondale, CO 81623
USA

Email: privacy@bluetent.com

If you are located in the EU, after May 25, 2018, you have the right to lodge a complaint with a supervisory authority in relation to the processing of your personal information, but we would appreciate the opportunity to speak with you first and resolve your issues.