

PRIVACY POLICY TERMS OF USE

JC Resorts, its parents, subsidiaries, related companies and other controlled affiliates (collectively, “JC Resorts,” “we,” “us,” and “our”) provides this privacy policy (the “Privacy Policy”) to describe the types of information we collect from you when you visit and use our websites maintained at www.jcresorts.com, www.surfandsandresort.com, www.scrippsinn.com, www.ranchobernardoinn.com, www.jcgolf.com, and any other websites and mobile applications operated by us that link to this Privacy Policy (the “Website(s)”), and our practices for collecting, using, and disclosing that information. This Privacy Policy applies to information collected from or about you on the Websites, through email and other electronic messages between you and the Websites, and when you interact with our advertising on third-party websites, if that advertising includes links to this Privacy Policy. This Privacy Policy also does not apply to information collected by any third party, including through any application or content (including advertising) that may link to or be accessible from the Website. Certain transactions and services offered while visiting the Websites may be processed or provided by service providers and other strategic partners, even though it appears that you may not have left the Website (e.g., reservations, payment processing, hosting).

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. BY ACCESSING OR USING THE WEBSITES, YOU CONSENT TO OUR COLLECTION, USE AND DISCLOSURE OF INFORMATION ABOUT YOU AS DESCRIBED IN THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH OUR POLICIES AND PRACTICES, DO NOT USE OUR WEBSITES. Your continued use of the Websites is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

The Websites are operated from the United States in accordance with laws of the United States and visitors to the Websites should be aware that the laws of the United States may differ from those of your country of residence. By using the Websites, participating in any Website activities, and/or providing us with your personal information, you: (i) consent to the transfers and processing of any information you provide to the Websites; (ii) acknowledge that U.S. law provides a lower standard of protection for personal data than the laws of various countries including, but not limited to, the European Union; and (iii) understand that the Websites will use, process and share your information in accordance with our Privacy Policy and U.S. law. Click on one of the links below to jump to a specific section:

TYPES OF INFORMATION WE COLLECT AND HOW WE COLLECT IT

We collect various types of information from and about you on the Websites, including:

“Personally Identifiable information” or “personal information,” is information relating to an identified or identifiable person, such as:

Identifiers. First and last name, email address, postal address, billing address, telephone numbers (including mobile telephone numbers), credit/debit card number, identification number, date of birth, or an online identifier.

Geolocation Data. Location data.

Internet activity information. Cookies and other technologies that collect traffic data, logs, page requests, search terms, the referring page, the time, date and duration of your visits to our Websites, or clickstream data. Personal information also may include information that is not personally identifiable standing alone (for example,

your travel dates) but is personally identifiable when combined with other information (for example, your travel dates together with your first and last name). Many pages on our Websites can be visited without providing any personal information. On other Website pages, you may be prompted or invited to provide certain personally identifiable information, such as to join our mailing list or to receive brochures or other promotional materials about JC Resorts properties or other offers that may be of interest to you. Certain features of some Websites, such as reservations, may require credit card and billing information as well.

“Non-personal information,” which is data from which you are not identifiable as an individual. Non-personal information also may include personal information that has been aggregated or de-identified such that it is rendered anonymous. For example, survey information that you volunteer may be de-personalized and/or aggregated such that it no longer personally identifies you, and would then be considered non-personal information. Non-personal information is not subject to this Privacy Policy, and we can use and share such information with third parties without restriction for any lawful purpose.

PERSONAL INFORMATION COLLECTED FROM EMPLOYEES

We may collect certain personal information from employees including:

Identifiers. Real name, alias, postal address, email address, social security number, driver’s license number, state identification card number, passport number, signature, telephone number, bank account number, health insurance information Professional or employment-related information Educational information

PERSONAL INFORMATION YOU PROVIDE TO US

The personal information we collect on or through the Websites may include:

Information you provide by filling out forms on the Websites. This includes, for example, information you provide when you make a reservation, purchase a gift card or make another purchase on the Websites, sign up to receive emails, offers or other information, email us or our properties through the Websites, submit a question or report a problem with our Websites, submit a Request for Proposal, or submit a form to plan a wedding at a JC Resorts property.

Information you provide to enter and participate in sweepstakes, contests or promotional offers. Records and copies of your correspondence, including email addresses, if you contact us, our properties or our service providers through the Websites. Information you provide in response to surveys.

Details of transactions that you carry out through the Websites and the fulfillment of your order.

AUTOMATICALLY COLLECTED INFORMATION

As you navigate through and interact with the Websites, we and our service providers may use automatic data collection technologies, such as cookies and other technologies, to collect certain Commercial Information and Internet Activity Information, including:

Information about your visits to our Websites, such as traffic data, logs, page requests, search terms, the referring page, the time, date and duration of your visits to our Websites, clickstream data, other communication data, the links that you click, your search queries, and the resources and content that you access and use on the Websites.

Information about your Internet connection and computer or other devices used to access the Websites, including your IP address, operating system or platform, browser type, mobile identifiers (such as Apple IDFA and Android Advertising ID) and the name of your Internet Service Provider.

Information about traffic patterns, number of visits to certain pages, visits from other websites or to third-party websites linked to the Website, and visitors' use of particular services and interest in services, information or features of the Website.

COOKIES AND OTHER TECHNOLOGIES

Like many other websites, our Websites may use cookies and Other Technologies to help us and third parties: obtain information about your visits to the Websites; deliver online and mobile advertisements and content for JC Resorts and for third parties that are tailored to your apparent interests; process your reservations, purchases or requests; analyze your visiting patterns; personalize your experience on the Websites; facilitate social media functions; and engage in website and advertising analytics. "Cookies" are small text files that are stored on your computer or device when you visit a website, if your web browser or device settings permit. Some cookies are stored only temporarily during a browsing session and are deleted when you close your browser (session cookies). Other cookies are not deleted when you close your browser, but are saved on your computer or device for a fixed period of time or until you delete them (persistent cookies). Each time you visit the Websites the server that set the cookie will recognize the persistent cookie stored on your computer or device. Various types of cookies may be used on our Websites, including:

HTTP request header information in order make our Websites function correctly and to personalize content presented to you, better understand how visitors use our Websites, and how we can better meet your needs. Cookies that are necessary for the Websites to work and enable you to navigate through and take advantage of our Websites and their features.

Cookies that determine your browser's ability to receive HTML email messages to determine the appropriate format for you to receive and read email.

Advertising cookies that allow us and other advertisers to serve you advertisements. Some advertising cookies help us to provide you with content on the Websites that is tailored to your interests and needs. Advertising cookies also enable our service providers and other advertisers serve ads to you when you browse other websites and mobile applications that are based on your apparent interests, including those that are inferred based on your activities across websites and mobile applications and over time. Other advertising cookies may help prevent you from seeing the same ad twice.

Analytics cookies collect information about your use of the Websites and your interaction with our content and advertisements to help us better understand and improve the way that the Websites work and to track and improve our advertising campaigns. These cookies provide us with aggregated information on metrics such as the most frequently visited pages on our Websites, help us understand how our visitors reach the Websites, show us how frequently various pages of our Websites are visited, help us understand whether our advertising is effective, and allows us to see overall patterns of the usage of our Website.

Social Media cookies that show social media platforms whether users are logged in to those platforms. These cookies are set by social media platforms. Many web browsers may be initially set to accept cookies. If you prefer, you can set your web browser to refuse cookies. You may also delete cookies manually from your

hard drive through your internet browser or other programs. For more information on how to manage browser cookies, see <http://www.allaboutcookies.org>. You also can learn more about opting out of our vendors' and other advertisers' use of cookies used to tailor ads and other content to you by visiting http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/choices>. View the Analytics and Online Tracking sections below to learn more about how to opt-out of other advertising cookies and analytics cookies. Please keep in mind that although you may disable cookies in your browser and still access and use the Websites, disabling cookies may prevent you from taking advantage of certain features on the Websites. Please also note that disabling or clearing cookies may affect cookie-based opt-outs by either preventing you from using such opt-outs or clearing cookie-based opt-outs that you previously set, in which case you would have to revisit the applicable pages and renew your opt-out after clearing cookies. Managing cookies also will not disable non-cookie technologies present on the Websites and Apps. Other Technologies also may be used on the Websites, allowing us and our third-party service providers to: track customer response to our advertisements, Website content and emails; determine our users' ability to receive HTML-based emails and to know how many users open an email; allow our service providers to compile aggregated statistics about our email and advertising campaigns; enable us to better target advertising and provide offers and promotions that we believe may be of interest to you; and enhance customer support and the usability of our Website.

ONLINE TRACKING "DO NOT TRACK" SIGNALS

Some web browsers may give you the ability to enable a "do not track" setting that sends a special signal to the websites you encounter while web browsing that you do not want to have your online activities tracked. These features are not yet uniform, and we do not respond to web browser "do not track" signals at this time. If we do so in the future, we will update this Privacy Policy to describe how we respond to such signals. As discussed below, we work with third-party vendors that use tracking technologies on our Websites in order to provide tailored advertisements on our behalf and on behalf of other advertisers across the Internet. These companies may collect information about your activity on our Websites and other websites over time, and use this information to determine which ads you see on third-party websites and mobile applications. For more information about these interest-based advertising practices and to understand your options, please visit the website for the Network Advertising Initiative at <http://www.networkadvertising.org> or the website of the Digital Advertising Alliance at <http://www.aboutads.info>.

INTEREST-BASED ADVERTISING

We may engage in interest-based advertising provided by vendors (such as advertising networks and ad servers) in order to deliver advertisements and personalized content that we believe will be of interest to you. These vendors typically use a cookie alone or with Other Technologies to track and collect anonymous information about your interests during your visits to our Websites and other websites and mobile applications or when you view or interact with one of the advertisements they place on various websites or on mobile platforms. These vendors use this information to make predictions about your characteristics, interests or preferences and to display advertisements across the Internet and on mobile platforms that are tailored to your apparent interests. Advertisements may be provided to you based on your online behavior (on our Websites and on third-party websites and mobile applications), or based on your search activity, your geographic location or other

information. For example, if you make a reservation on the Websites, you may see an advertisement from JC Resorts later when you visit another website or on a mobile platform. This is called retargeting. You also may see the advertisements for third parties on the Websites, on third-party websites or mobile platforms based on your visits to, and activities on, the Websites, third-party websites, and mobile platforms. To the extent that third-parties are using cookies or Other Technologies for interest-based advertising, JC Resorts does not control the use of the technologies or the resulting information. We use Google's Remarketing with Google AdWords to retarget users and show you our ads as you browse other websites around the Internet. The Remarketing service delivers our ads through the Google Display Network, which includes both Google.com pages and the sites of trusted publishers. [Click here](#) for more information on the types of advertising cookies that Google uses, and [here](#) for more information about how Google uses advertising cookies. [Click here](#) to read the Google privacy policy. You can opt-out of Google's use of cookies and/or customize Google display network ads by visiting the Ads Settings at <https://www.google.com/ads/preferences/>. Alternatively, you can opt-out of Remarketing with Google by visiting <http://www.networkadvertising.org>. We also use the DoubleClick cookie in connection with Google's Remarketing service. To learn more about DoubleClick cookies, [click here](#). If you want to permanently opt-out of the DoubleClick cookie, you can install the DoubleClick opt-out extension by [clicking here](#). To serve ads in our mobile applications, Google may use anonymous identifiers. These perform similar functions to cookies. To learn more about how to opt-out of interest-based advertising for your mobile device, [click here](#). Some advertising networks are members of the Network Advertising Initiative, which offers a single location to opt-out of ad targeting from member companies. To learn more about interest-based advertising generally as well as your options for opting-out, please visit <http://www.networkadvertising.org> or <http://aboutads.info>. Please keep in mind that even if you opt out of receiving ads tailored to your apparent interests, you will continue to see ads from online advertising networks. However, those networks will not be able to apply any of your apparent ad preferences and the ads that you see therefore may be less relevant to your interests.

ANALYTICS

We engage service providers to provide us analytics data relating to use of the Websites and our advertising. These service providers may use cookies and Other Technologies alone or in conjunction with anonymous identifiers to collect information about you when you use the Websites or interact with our ads on other websites. For example, we use Google Analytics to measure and report how users interact with our Websites and advertisements for the purposes of understanding and optimizing web usage, measuring conversion tracking, measuring, enhancing and optimizing the effectiveness of our content and advertising campaigns, targeting advertising, and for other business and market research purposes. For more information about Google Analytics and how it collects and processes data, please see "How Google Uses Data When You Use Our Partners' Sites or Apps." For more information about how Google Analytics uses cookies to measure user interactions on websites, [click here](#). Google's ability to use and share information collected by Google Analytics about your visits to the Websites is restricted by Google's Terms of Service and the Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to the Websites by disabling cookies on your browser, as described above. If you do not want your Website visit data reported by the Google Analytics JavaScript, you also can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript to prohibit sending visit information to Google Analytics, but does not prevent information

from being sent to the Website itself or in other ways to other website analytics services. [Click here](#) if you would like to learn more about the Google Analytics opt-out browser add-on, and [click here](#) to install the opt-out browser add-on. We do not combine the information collected through the use of Google Analytics with your personal information.

USE OF PERSONAL INFORMATION

JC Resorts uses personally identifiable information for the following purposes:

To present the Websites and their contents to you; To fulfill the reservations and transactions that you request from us, including facilitating your requests to plan and reserve hotel accommodations, dining service, spa services or other travel services, and to buy gift certificates; To process and respond to your inquiries, comments, complaints, and requests for information (including information about reservations, accommodations, weddings, meetings, events, properties, real estate, or other matters or opportunities); To improve the content and navigability of the Websites, or to administer or troubleshoot the Websites; For the purposes for which you provided the information; To improve our services and properties and to develop new services, properties and offerings; To alert you to new Website features, special events, products and services; To send you important notices, such as communications about reservations and changes to our terms, conditions and policies (because this information is important to your interaction with JC Resorts, you may not opt-out of receiving these communications); To conduct auditing, analytics, data analysis, monitor and analyze Website traffic and usage, and research to evaluate user needs; To plan special weddings, meetings, and other special events; To contact you about our own and third parties' products, services, hotels, real estate developments, opportunities, special events, and promotions that may be of interest to you; To conduct customer satisfaction, market research and quality assurance surveys;

To validate your identity or verify communications from you; To send you confirmations, notices, updates, security alerts, support, and administrative messages and to otherwise facilitate your use of, and our administration and operation of, the Websites; To protect our rights and the security or integrity of our Websites, properties and business; To prevent fraud and other prohibited or illegal activities, to investigate and resolve disputes, claims and problems, and to otherwise comply with applicable laws and regulations; To enforce our Terms of Service and our other agreements and contractual obligations; In any other way we may describe when you provide the information; and For any other purpose with your consent. You may withdraw your consent at any time by contacting us at privacypolicy@jcreorts.com.

IP Addresses are automatically reported by your browser each time you view a page on the Websites. We may use your IP address for various purposes, including to: determine your general (but not precise) geographic location and to tailor advertising based on general geographic area or other information derived from your IP address; provide aggregated data to advertisers about the volume of use on the Websites; diagnose or service technology problems; estimate the total number of users visiting the Websites from specific geographical regions; and to track advertising and conversions on the Websites. We reserve the right to combine personally identifiable information we collect on the Websites with publicly available information or information otherwise obtained from third parties or affiliates. We may aggregate or anonymize information that we have collected for use in connection with interest-based advertising.

The legal basis for processing your personal information is made up of one or more of the following reasons: (i) your consent, and/or (ii) providing the services you have requested, and/or (iii) compliance with applicable laws, regulations, court orders or other legal process.

HOW WE SHARE PERSONAL INFORMATION

JC Resorts does not rent, sell, or disclose your personally identifiable information to non-affiliated companies except to provide products and services you have requested, when we have your permission, as permitted by applicable law, or as otherwise described in this Privacy Policy. Specifically, we have not sold your personal information in the previous 12 months We may disclose your personally identifiable information:

To our vendors, service providers, contractors and agents that we use to support our business and properties, including those performing core services such as data processing and storage, marketing, promotion and advertising services (including email marketing, direct mail, and online and mobile advertising), hardware and website support, website hosting, email management, surveys, payment processing, fraud prevention, debt collection, customer service, administering sweepstakes and surveys, public relations, and security related to the operation of the Websites and the development and operation of our business and our properties operated under JC Resorts.

To our affiliated companies and properties. To our strategic partners offering or providing products or services jointly with or on behalf of JC Resorts. To other third parties to fulfill the purpose for which you provide it, for example, to provide products or services you have requested.

To a buyer or other successor in the event of merger, acquisition, consolidation, divestiture, change in control, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about users of our Websites will be among the assets to be transferred, and any such successor may use your information for the same purposes set forth in the Privacy Policy.

To other third parties disclosed to you when you provide the information or with your consent. In addition, we reserve the right to use IP addresses to identify you and we may provide any information about or relating to you, including any personally identifiable information about you collected under this Privacy Policy, to third parties without your consent if we reasonably believe that such action is necessary to:

Comply with legal, regulatory or administrative requirements of any governmental or law enforcement authorities or to otherwise fulfill a government or law enforcement request for information;

Comply with a court order, search warrant, subpoena, or other legal process; Respond to claims that any content on the Websites violates the rights of third parties, including without limitation providing information necessary to satisfy the notice and counter-notice procedures pursuant to the Digital Millennium Copyright Act; Establish or exercise our legal rights and to protect and defend the Websites, Website users, JC Resorts, its affiliates, and all of their respective officers, directors, members, partners, employees, attorneys, agents, contractors, property owners, licensors, and partners, in connection with any threatened or actual legal action, claim or dispute; In an emergency, to protect the health and safety of our Websites' users or the general public; or To enforce, apply or comply with our Terms of Service.

WE HAVE SHARED THE FOLLOWING CATEGORIES OF INFORMATION IN THE PREVIOUS 12 MONTHS:

Identifiers

Commercial Information

Internet Activity Information

Geolocation Data

INTERNATIONAL TRANSFERS

We may share your data across multiple jurisdictions in order, if reasonably necessary, to provide you with the best possible services. Your personal information may be transferred and stored in the United States of America and in other countries where our third party service providers, advisors and consultants are located.

THIRD-PARTY WEBSITES AND THIRD-PARTY ADVERTISING

The JC Resorts Websites may contain hyperlinks to or advertising for third-party websites. By clicking on these links or advertisements, you are visiting websites outside of JC Resorts' control. JC Resorts is not responsible for any content on third-party websites, or for the collection, use, maintenance, sharing, or disclosure of data and information by the operators of those websites. This Privacy Policy does not apply to information, including personal information, you provide when visiting third-party websites. We urge you to note when you leave our Websites and to read the privacy statements of third-party websites for information about their data collection practices before submitting any personally identifiable information to other websites. Third-party websites include social media sites (such as Facebook and Twitter) on which JC Resorts or our properties may have accounts or fan pages where you may be able to post information and materials. If you have any questions about the privacy practices of other websites, you should contact the relevant parties controlling these websites for more information.

WIDGETS AND PLUG-INS

The Websites may use widgets and plug-ins (such as the Facebook "like" button, the Twitter "Follow Us" feature, or similar mechanisms from Instagram, Google+, Pinterest, or other social media platforms), which are interactive mini-programs that run on our Websites to provide specific services from another company. Such third-party features may collect information about you, like your IP address and the page(s) you visit on the Websites, as well as personal information, such as your email address. They also may place cookies or other tracking mechanisms on your browser or device to enable the widget to function properly. Your interactions with these features are governed by the privacy policies of the third parties that created them. We encourage you to review the privacy policies of the applicable third party before using them.

MINORS

Our Websites are not directed to or intended to be used by individuals under the age of 18. We do present information regarding our kids programs on some of our Websites for the reference of adults that are interested in activities at our properties for children. We do not knowingly collect personal information from anyone under the age of 18. If we are notified that we have collected or received personal information from a child under the

age of 18, we will take reasonable steps to delete that information in accordance with applicable laws. If you are the parent or guardian of a child under the age of 18 and you believe your child has provided us personal information about themselves, please contact us by emailing us at privacypolicy@jcreorts.com or by sending us a letter to JC Resorts, Attention: Privacy Department, 533 Coast Blvd South, La Jolla, CA 92037.

PROTECTING YOUR INFORMATION

We take reasonable steps to protect personally identifiable information that we store from accidental loss or from unauthorized access, disclosure, alteration or destruction. For example, our servers are protected by reasonable physical and electronic security measures. Despite these efforts, please be advised that no electronic storage, security system or means of transmitting data over the Internet can be guaranteed to be entirely secure, including without limitation with respect to computer viruses, malicious software and hacker attacks, and there is some risk that an unauthorized third party may find a way to circumvent our security systems or that transmission of your information over the Internet will be intercepted. We cannot and do not guarantee or warrant the security of your personal information. Unless otherwise expressly stated, email transmissions sent through the Websites are not secure. Therefore, for your own privacy protection, we recommend that you do not include any confidential or sensitive personal information such as passwords, credit card details, or bank account information, in any emails that you send to us.

YOUR RIGHTS

Your principal rights under the European Union General Data Protection Regulation are: (a) right of access; (b) right to rectification; (c) right to erasure; (d) right to restriction of processing; (e) right to data portability; and (f) right to object. You may exercise these rights by contacting privacypolicy@jcreorts.com.

You may file a complaint with the applicable supervisory authority if you believe we are not complying with applicable data protection laws.

YOUR CALIFORNIA PRIVACY RIGHTS

Pursuant to California Civil Code Section 1798.83, individual customers who reside in California and who have provided their personal information to JC Resorts may request information about our disclosure of certain categories of personally identifiable information to third parties for the third parties' direct marketing purposes. Such requests must be submitted to us at one of the following addresses: privacypolicy@jcreorts.com or JC Resorts, Attention: Privacy Department, 533 Coast Blvd South, La Jolla, CA 92037. Please include the subject heading "California Privacy Rights." Within thirty days after receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year (if any), along with the names and addresses of these third parties. This request may be made no more than once per calendar year. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

YOUR RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT

Beginning January 1, 2020, pursuant to California Civil Code Sections 1798.100-1798.199, individuals who reside in California who have provided their personal information to JC Resorts may have the right to:

Request access to the personal information we have collected about you

Request disclosure of the personal information we have collected and shared about you

Request disclosure of the categories of personal information we have disclosed for a business purpose

Request that we delete your personal information

If you exercise any of these rights you will not be discriminated against in any way.

Beginning January 1, 2020, you may exercise these rights in any of the following ways:

Calling 855-230-3936

Completing a Data Access Request form.

If you choose to exercise any of the rights listed above, for the protection of your information, we will verify your identity. Your identity may be verified in any of the following ways:

Through your membership account

By confirming at least three (3) information points of your information we maintain

In certain circumstances you may be able to designate an authorized person to make a request on your behalf. To determine if this applies to you please send an email to privacypolicy@jcreorts.com.

YOUR CHOICES

Separate from the rights you may have above, you can also manage your personal information in the following ways:

Information You Provide. You choose what personal information (if any) you wish to provide to us. If you choose not to provide certain details, however, some of your transactions with us may be impacted.

Promotional Emails. You can opt-out of receiving marketing emails from us by sending us an email stating your request to privacypolicy@jcreorts.com. You also may use the “unsubscribe” link in promotional emails that you receive from us. Please keep in mind that opting out of marketing emails may impact our ability to allow you access to certain offers, benefits and features. Please also note that even if you opt-out of receiving certain marketing emails, that opt-out may not apply to other communications that you may continue to receive from us, such as customer service messages, messages about your account or reservations with us, notices of changes to our terms and conditions or this Privacy Policy, and emails responding to your communications with us or requests for information that we receive from you. Requests to opt-out of receiving future marketing emails from us can take up to ten business days to be effective.

Updating Your Information. You may be able to update or correct certain personal information by contacting us as described in the “Contact Us/Questions” section below.

RETENTION PERIOD

To the extent permissible by applicable law, we will retain your personal information for such period as necessary to satisfy or to fulfill the following:

the purposes for which that personal information was provided,
an identifiable and ongoing business need, including record keeping,
a specific legal or regulatory requirement, and/or
a requirement to retain records that may be relevant to any notified regulatory investigations or active legal proceedings.

CHANGES TO THIS PRIVACY POLICY

We may change or update this Privacy Policy at any time, but we will always update it at least once a year. You can identify the date that this Privacy Policy was last updated by looking at the date at the top of this Privacy Policy. When we change this Privacy Policy in a material way, a notice will be posted on the homepage of the Websites for a reasonable period of time following such update. Any changes to this Privacy Policy will take effect upon posting to the Websites. Use of the Websites following posted changes constitutes your acceptance of the revised Privacy Policy then in effect.

CONTACT US / QUESTIONS

To ask questions or to comment on this Privacy Policy, please contact us by email at privacypolicy@jcreorts.com, or by post at JC Resorts, Attention: Privacy Department, 533 Coast Blvd South, La Jolla, CA 92037. JC Resorts is considered a data controller under the European Union General Data Protection Regulation.