

# Privacy Notice

Updated December 27, 2019

TPG Rewards, Inc. is committed to maintaining your confidence and trust as it relates to the privacy of your information. Please read below and learn how we collect, protect, share and use your information during your participation in any of our promotions and when you visit our technology platforms, including, without limitation, our websites, interactive features, applications, social network pages, and mobile application (“Platforms” or “promotions”).

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## 1. INFORMATION COLLECTED ON OUR PLATFORMS.

### Information You Provide To Us

We may collect Personal Information (information that can be used to identify you as an individual) such as your name, email, telephone number, home address, demographic information (such as zip code, age), or payment information (such as account or credit card number). The types of Personal Information we collect may vary depending on your use of the features of the Platforms. In many cases we need this information to provide the personalized or enhanced service that you are interested in. You never have to answer our questions regarding your Personal Information, and you can decline this exchange of information on any site on the Internet - not just ours - at any time.

### Information Collected Automatically

*Usage Information.* Whenever you participate in one of our programs or visit or interact with the Platforms, we, as well as any third-party advertisers and/or service providers, may use a variety of technologies that automatically or passively collect information about how the programs or Platforms are accessed and used (“Usage Information”). Usage Information may include browser type, device type, operating system, application version, the page served, the time, the preceding page views, and your use of features or applications on the Platforms, interaction with friends and group activities, information derived from receipts, purchasing trends and online and offline activities and interests. This information helps us keep our programs and Platforms fresh and interesting to our visitors and allows us to tailor content to a visitor’s interests. We may also anonymize or group this information into aggregate visitor data in order to describe the use of the Platforms or promotions to our existing or potential business partners, sponsors or other third parties.

*Device Identifier.* We automatically collect your IP address or other unique identifier (“Device Identifier”) for the Device (computer, mobile phone, tablet or other device) you use to access the promotions or Platforms. A Device Identifier is a number that is assigned to your Device when you access a website or

its servers, and our computers identify your Device by its Device Identifier. We may use a Device Identifier to, among other things, administer the Platforms, help diagnose problems with our servers, analyze trends, track users' web page movements, help identify you and your promotion entry, and gather broad demographic information for aggregate use.

*Cookies; Pixel Tags.* The technologies used in our promotions and on the Platforms to collect Usage Information, including Device Identifiers, include but are not limited to: cookies (data files placed on a Device when it is used to visit the Platforms), mobile analytics software and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed). Cookies may also be used to associate you with social networking sites like Facebook, Instagram, Twitter and YouTube and, if you so choose, enable interaction between your activities on the Platforms and your activities on such social networking sites we, or our vendors, may place cookies or similar files on your Device for security purposes, to facilitate site navigation and to personalize your experience while visiting our Platforms (such as allowing us to select which ads or offers are most likely to appeal to you, based on your interests, preferences, location, or demographic information). A pixel tag may tell your browser to get content from another server.

To learn how you may be able to reduce the number of cookies you receive from us, or delete cookies that have already been installed in your browser's cookie folder, please refer to your browser's help menu or other instructions related to your browser. If you do disable or opt-out of receiving cookies, please be aware that some features and services on our Platforms may not work properly because we may not be able to recognize and associate you with your TPG Rewards account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

## **2. HOW WE USE THE INFORMATION WE COLLECT.**

We use the information we collect about and from you for a variety of business purposes such as to respond to your questions and requests; provide you with access to certain areas and features of the Platforms or programs and your interaction with other users; verify your identity; communicate with you about your account and activities on the Platforms and, in our discretion, changes to any TPG Rewards policy; tailor content, advertisements, and offers we or our business partners may serve you; improve the Platforms; comply with license obligations; and for purposes disclosed at the time you provide your Personal Information or otherwise with your consent. We may also collect your location-based information for the purpose of providing you with certain services.

### Legal Bases for Processing (for EEA Users)

If you are an individual in the European Economic Area (EEA), we collect and process your Personal Information only where we have legal bases for doing so under applicable EU laws. The legal bases depends on the promotions you enter, how they operate, and how you use them. This means we collect and use your Personal Information only where:

- We need it to operate the promotion, provide customer support and personalized features, help prevent fraud, and to protect the safety and security of our platforms and promotion services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for our internal development of improved services, to market and promote the promotions, and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose; or
- We need to process your Personal Information to comply with a legal obligation or where the processing is necessary to the establishment, exercise or defense of legal claims.
- If you consented to our use of your Personal Information for a specific purpose, you have the right to change your mind at any time but note that this will not affect processing that has already taken place.

Where TPG Rewards is using your Personal Information because our client and/or TPG Rewards have a legitimate interest to do so, you have the right to object to that use although this may mean no longer participating in a promotion. If we are unable to manage your participation in a promotion without the Personal Information you provided (such as your registration information), you will no longer be able to participate in the applicable promotion. To learn how to opt-out of allowing use of your Personal

Information, please refer to Sections 5 and 6.

### 3. SHARING OF INFORMATION.

Except as described in this Privacy Notice, we will not provide any of your Personal Information to any third parties without your consent. We may share non-Personal Information, such as aggregate data, demographic information, and Usage Information with third parties. We may also share your information as disclosed at the time you provide your information, as set forth in this Privacy Notice and in the following circumstances:

**Third Parties Providing Services On Our Behalf and Affiliates.** We create promotions with consumer product companies, or other clients, who sponsor the offers that we provide to you. In order to carry out your requests, to make various features, services and materials available to you in our promotions, and to respond to your inquiries, we may share your Personal Information and Usage Information with such consumer product companies and also third parties that perform functions on our behalf (or on behalf of our partners) such as service providers that host or operate our Platforms, analyze data, process transactions and payments, or provide customer service; advertisers; sponsors or other third parties that participate in or administer our promotions, contests, sweepstakes, surveys or provide marketing or promotional assistance and “powered by” partners or partners in co-branded sites. Your Personal Information may also be used by us or shared with our subsidiaries, affiliates, sponsors, partners, advertisers or other third parties to provide you with product information and promotional and other offers.

**Your Agreement To Have Your Personal Information Shared.** While on our Platforms, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else, such as a client or to otherwise consent to the sharing of your information with a third party, including social networking sites such as Facebook, Instagram, Twitter or YouTube. If you agree to have your Personal Information shared, your Personal Information will be disclosed to the third party and the Personal Information you disclose will be subject to the privacy policy and business practices of that third party, not ours.

**Business Transfers.** We may share your Personal Information with other entities and our affiliates primarily for business and operational purposes. In the event that TPG Rewards is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction.

**Legal Disclosure.** We may transfer and disclose your information to third parties to comply with a legal obligation; when we believe in good faith that the law or a governmental authority requires it; to verify or enforce our Terms of Use or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect our rights or property or security of third parties, visitors to our Platforms or the public.

### 4. INFORMATION WE RECEIVE FROM THIRD PARTIES.

We may receive information about you from clients, affiliated companies, or other third parties, in accordance with their terms and policies. For example, if you are on another website and you opt-in to receive information from TPG Rewards, that website will submit to us your email address and other information about you so that we may contact you as requested. You may also choose to participate in a third party application or feature (such as one of our Facebook or Twitter applications or a similar application or feature on a third party website) through which you allow us to collect (or the third party to share) information about you, including Usage Information and Personal Information such as lists of your friends, “likes”, comments you have shared, groups and location. Services like Facebook Connect may give you the option to post information about your activities on our Platform to your profile page to share with others within your network. In addition, we may receive information about you if other users of a third party website give us access to their profiles and you are one of their “connections” or information about you is otherwise accessible through your “connections” web page, profile page, or similar page on a social networking or other third party website or interactive service. We may supplement the information we collect about you through the Platforms with such information from third parties in order to enhance our ability to serve you, to tailor our content to you and/or to offer you opportunities to purchase products or services that we believe may be of interest to you.

## **5. YOUR PRIVACY RIGHTS, CHOICE AND ACCESS.**

You may always direct us not to share your Personal Information with third parties, not to use your Personal Information to provide you with information or offers, or not to send you newsletters, emails or other communications by: (i) modifying your registered user information on the Platforms; (ii) contacting us by mail at TPG Rewards Inc, 29 Broadway, Ste 1400, New York, NY 10006; (iii) following the removal instructions in the communication that you receive; or (iv) sending us an email at [customerservice@tpgny.com](mailto:customerservice@tpgny.com). Please make sure to include the name of the promotion (if one exists) in the subject line and in the body of the email from which you wish to opt-out. Failure to provide this information may delay the processing of your request.

If you wish to modify, verify, correct, or delete any of your Personal Information collected through the Platforms, you may edit your registered user information or contact us at the above address or email. In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Platforms. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. It may not always be possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons. We will retain your information (including geo-location data) for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us at the above address or email. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

We do not control certain privacy settings and preferences maintained by our clients, social media partners like Facebook, Instagram, Twitter and YouTube, or other relevant third party. If you wish to make changes to those settings and preferences, you may do so by visiting the privacy or settings page of the appropriate client, social media site, or other relevant third party.

## **6. ADVERTISING/BEHAVIORAL TARGETING; HOW TO OPT-OUT.**

We may use third party ad network providers to help present ads on the Platforms, as well as other service providers to evaluate and provide us with information about the use of the Platforms and viewing of our content. We do not share Personal Information with these providers (unless, of course, you give us permission). Such providers may place and access cookies, pixel tags, or similar technologies on your Device to serve you ads or other content personalized to your interests which they infer from your browsing on the Platforms and other sites you have visited. In doing so, the provider collects or has access to non-Personal Information such as your Usage Information. The use of cookies, pixel tags, or similar technologies by these providers is subject to their own privacy policies, not ours.

If you do not want to receive the benefits of targeted advertising, you may opt-out of some network advertising programs that use your information by visiting the NAI Opt-Out Page at [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp). Please note that even if you choose to remove your information (opt-out), you will still see advertisements while you're browsing online. However, the advertisements you see may be less relevant to you and your interests. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides a mechanism to opt-out of receiving cookies from those companies.

## **7. CHILDREN.**

We do not knowingly collect, use or disclose personally identifiable information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records.

In some instances, however, TPG Rewards does operate promotions on behalf of clients that will collect personal data from children under the age of 13. In each such instance, TPG Rewards will fully comply with the Children's Online Privacy Protection Act ("COPPA") or other applicable law when operating the promotion, in the collection of the Personal Information, and in subsequently using and deleting the data collected. Personal Information will not be collected from children under the age of 13 without parental consent in compliance with the COPPA guidelines.

## **8. CALIFORNIA PRIVACY RIGHTS.**

For more information about the Personal Information we collect, purposes for the collection of the Personal Information and third parties with whom we might share the personal information, please see the disclosures in this Privacy Notice. As a California resident, you may have the right to request to access the Personal Information we have collected about you during the past 12 months. In addition, you have the right to request that we delete certain Personal Information we maintain about you, subject to certain exceptions. Finally, you also have the right to opt-out of the sale of your Personal Information. To submit a request to access, to delete, or opt-out, you may contact us by (i) mail at TPG Rewards Inc, Attention: Privacy, 29 Broadway, Ste 1400, New York, NY 10006; or (ii) send us an email at [customerservice@tpgny.com](mailto:customerservice@tpgny.com). Please make sure to include the name of the promotion (if one exists) and California Privacy in the subject line and in the body of the letter.

To help protect your privacy and maintain security, we take steps to verify your identity before granting you access to your personal information or considering your deletion or other request. Upon receipt of your request, we will send you a verification form. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. Please understand that we cannot delete personal information in those situations where our retention is required for our own internal business purposes or otherwise permitted by the CCPA (such as fraud prevention or legal compliance).

## **9. SECURITY OF YOUR INFORMATION.**

We take information security seriously and use certain reasonable security measures to help protect your Personal Information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information you transmit to us, and you use the Platforms and provide us with your information at your own risk.

## **10. OTHER SITES.**

The Platforms may contain links to other sites that we do not own or operate. This includes links from advertisers, sponsors and/or partners that may use our logo(s) as part of a co-branding or co-marketing agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies to your Device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Platforms (including those linked to through an email or social networking page).

The Platforms may make available chat rooms, forums, message boards, and news groups. Remember that any information that you disclose in these areas becomes public information and is not subject to the provisions of this Privacy Notice.

## **11. CONSENT TO PROCESSING AND TRANSFER OF INFORMATION.**

The U.S. Platforms are governed by and operated in, and in accordance with the laws of, the United States. Regardless of where you use our Platforms or otherwise provide Personal Information and non-personally identifiable information, that information may be collected, processed, maintained and transferred to servers located in the U.S. and/or other jurisdictions in which our service providers and affiliates may be located.

By using the Platforms, or providing us with any information, you (a) acknowledge that the Platforms are subject to the laws of the United States, (b) consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen, and (c) waive any claims that may arise under those laws.

## **12. CHANGES.**

We may update this Privacy Notice to reflect changes to our privacy practices. Any changes we may make to our Privacy Notice will be posted on this page and/or communicated to you in other ways if required by law. These changes will take effect immediately upon posting. For your convenience, the last revised date of the current Privacy Notice will be posted at the top of this page. We encourage you to periodically review this page for the latest information on our privacy practices. By continuing to use the Platforms following such changes, you will be deemed to have agreed to such changes. Where required to do so by law, we may seek your prior consent to any material changes we make to this Privacy Notice.

## **13. CONTACT US.**

If you have any questions or concerns about this Privacy Notice, the practices of the Platforms, or your experiences with the Platforms, please contact us at:

TPG Rewards Inc., 29 Broadway, Ste 1400, New York, NY 10006

Telephone: (800) 838-4550

Email: [Customerservice@tpgny.com](mailto:Customerservice@tpgny.com)