



## ADVENTURE GENIE PRIVACY POLICY

Effective: 11/18/2023

This privacy policy (the “Privacy Policy”) applies to [www.adventuregenie.com](http://www.adventuregenie.com)<sup>1</sup> (the “Website”). The purpose of this Privacy Policy is to disclose to you what information we may collect, how we may collect it, with whom we may share it, and certain other matters related to such information, including the choices you have regarding our collection of information and our use and disclosure to other parties of information we may have collected from you.

The Website is operated by Adventure Genie Inc., (“we”, “our”, “us”, or “AdventureGenie”). We own the information collected via the Website and we may use it for our own purposes, including marketing, in line with legal requirements. Please note that this Privacy Policy applies only to information collected on this Website; it does not apply to any information collected by third parties.

When this Privacy Policy uses the term “personally identifiable information” or “personal information,” we mean information that identifies a particular individual, such as your full name, street address, phone number, precise geolocation, or email address. When other

---

<sup>1</sup> <http://www.adventuregenie.com/>

information is associated with personal information, it also becomes personally identifiable information for the purposes of this Privacy Policy.

- **What Information Is Collected**
- **How Do We Collect Information**
- **How Is your Information Used**
- **Shared Information**
- **Links To Third-party Websites**
- **Information Security**
- **Data Retention Periods**
- **Other Social Media Websites, Blogs, Message Boards**
- **Your California Privacy Rights**
- **General Audience Web Website Not Directed Toward Children**
- **Consent to Privacy Policy**
- **Access to Personal Information**
- **Questions About This Privacy Policy**

## 1. [What Information Is Collected](#)

The following are the types of information we may collect:

AdventureGenie may collect personal information like name, telephone number, email address, date of birth, home or business mailing address, and details regarding your mode of payment, e.g., credit/debit card or account information, when you access certain areas of the Website that require registration or payment for products and services, or if you require more information about those services.

### Non-Personal Information

At other times, Adventure Genie may collect information that cannot be used to directly identify you, such as browser type, Dynamic Internet Protocol (IP) address, “click stream” data, and similar non-personally identifiable information. For example, we may aggregate non-personal information about you and other customers who visit certain areas of our Website. Aggregated information will not contain any information that can be linked directly back to you.

---

*Aggregated information will not contain any information that can be linked directly back to you.*

---

We will not use non-personal information to try to identify you, and if we associate any non-personal information with information that personally identifies you, then we will treat it as personal information.

While we take all reasonable steps to protect the privacy of our Website visitors, we cannot promise that the current limitations of our online applications programming will address every browser setting or honor every personal browser preference. In particular, we have not implemented the necessary program changes to honor “Do Not Track” or “DNT” browser signals. As our online applications programming is refined, we will take all reasonable steps to honor such requests in the future. Please return to this privacy policy for further updates on this topic.

Further, our online service providers or business partners may implement technologies that allow for the collection of personally identifiable information over time and across websites. We recommend that you review each privacy policy posted on the websites that you visit to better understand privacy practices on those websites.

#### Electronic Communications

When you open emails from us or engage in SMS or MMS communications, we may log and store such information. We may also keep records of various communications regarding the types of products and services that you indicate are of interest to you via your response to email and text messaging. You will always have the option to opt out of such communications by click an “unsubscribe” link to replying “STOP” to our text messages.

## 2. How Do We Collect Information

We may collect information from you in several different areas on the Website, including, without limitation, those described below:

#### Registration

You may be asked to complete a registration form and provide personally identifiable information; you may also be asked to choose a user ID and password in order to take advantage of certain features the Website or digital messaging content. Your decision to register is voluntary and you will have the opportunity to decide whether or not to disclose information to us and what communications you would like to receive; however, please be advised that many products and services available on the Website require registration and if you elect not to provide such information, you will not be able to take advantage of those products and services.

## Cookies and Tracking Technology

We may use any number of tools to collect information about you, your computer access points, and the web browser that you use to connect to our Website. For example, “cookies” are tiny text files that we place on your computer’s hard drive when you visit our Website. We may use cookies to personalize your Website experience, to keep you logged in, save your preferences for the Website, and/or to collect information about how you use our Website. You do not have to accept our cookies and you may delete them after they have been placed on your hard drive. If you do not accept or delete our cookies, some areas of our Website that you access may take more time to work, or may not function properly. For example, if you erase cookies, you may be forced to login to the Website again, and you may lose some preferences or settings. For more information about cookies, visit: <http://www.allaboutcookies.org>.

---

*We may collect information from you in several different areas on the Website, including, without limitation, those described below:*

---

AdventureGenie may also collect additional information from your web browser each time you visit our Website. We may collect information on the pages that you visit, the promotions or advertisements that you click on, and other actions that you take while using our Website. This information may include your IP address, the type of browser, the time that your browser was used to access our Website, and the referring website address.

Our Internet Service Providers (defined below) may also use other standard web-based technologies to analyze your movements while accessing our Website. The technologies include analytic solutions, web “beacons,” “pixel tags,” and “clear gifs.” These technologies help us ascertain the effectiveness of our product and service campaigns and marketing programs, allow us to customize the services offered on or through our Website, and help determine the best use for Website content, and product and service offerings. Some of this information, including the IP address, may be stored on our Internet service provider’s server logs, and may be available for extended periods of time.

## Transaction Information

---

*In some instances, we may direct you to a third-party vendor Website to collect this information from you directly.*

---

If you conduct a financial or other transaction with the Website, such as subscribe to a Subscription Product or other products/services offered on the Website, we will ask you to

complete an order form that will request certain information from you, including contact information, demographic information and/or financial information. In some instances, we may direct you to a third-party vendor Website to collect this information from you directly. Even though the collection form may have the look and feel of our Website, please be aware you will be giving your information directly to the third-party vendor, and that in some instances such third party vendor's privacy policy will govern the collection of your personal information. Please reference the privacy policies available from these pages for any privacy related concerns.

We and/or our vendor will use this information to complete the financial or other transaction that you have requested, i.e., to deliver the information, products or other services that you request or purchase, to invoice you, and in a manner consistent with this Privacy Policy. For your protection, financial information is collected and stored through encrypted means.

### 3. How Is your Information Used

Adventure Genie uses the services of independent companies to provide certain services to you, including, without limitation, website hosting services, credit and debit card processing, order fulfillment, context and sweepstakes processing, and Internet connectivity services ("Internet Service Providers"). When we use an Internet Service Provider, we require that the Internet Service Provider use and disclose the personal information received from us only to provide their services to us or as required by applicable law.

We may use your personal information to contact you via mail, email, text message, or telephone in order to give you updates about our special events, new services, winner confirmations, or other promotions that may be of interest to you. We also use return email addresses to answer the email we receive from you. We may also use your IP address to help protect us and our Internet Service Providers from fraud.

Additional uses of your non-personal and personal information will allow us to tailor products and services specific to your needs, to help organize and manage your customer relationship and our business, to conduct business, to provide you with customer and member support, to perform functions that are described to you at the time of collection, and to enforce our Website's Terms and Conditions of Use.

We may also use non-personal aggregate information to improve our Website. For example, our Internet Service Providers may report to us that there were a particular number of visitors to a certain area of our Website, or that a certain number of men or a certain number of women completed our registration form in particular areas of our Website. Such information may also be used to analyze the effectiveness of our business and advertising models.

### 4. Shared Information

We may share your personal information with the Internet Service Providers as appropriate and as permitted by law. We may also share personally identifiable information with outside, non-

affiliated third parties that offer products and services that are complementary to our product lines. We may also disclose your personal information as is necessary to: (a) comply with a subpoena or court order; (b) cooperate with law enforcement or other government agency; (c) establish or exercise our legal rights; (d) protect the property or safety of our company and employees, contractors, vendors, and suppliers; (e) defend against legal claims; (f) help with internal and external investigations; or (g) as otherwise required by law or permitted by law. We may disclose your information in connection with the sale or merger of AdventureGenie Website or any transaction that involves the sale or assignment of some or all of our assets.

Third-Party Ad Serving and Audience and Traffic Measurement Services: We may use a third-party network advertiser to serve the advertisements on the Website or may use a traffic measurement service to analyze the traffic on the Website. Network advertisers are third parties that display advertisements based on your visits to this Website and other websites you have visited. Third-party ad serving enables us to target advertisements to you for products or other websites of interest. Audience and Traffic Measurement Services allow us to collect anonymous traffic and behavior information from the Website by monitoring anonymous visitor activity. Although advertisers or other companies do not have access to the Website cookies, advertisers, sponsors and/or traffic measurement services may themselves set and access their own cookies on your computer if you choose to have your cookies enabled in your browser. Cookies allow third-party advertisers to show you advertisements or content you might be interested in. Note that any images (or any other parts of a web page) served by third parties in association with third-party cookies may serve as web beacons, which enable third parties to carry out the previously described activities. Other companies' uses of their cookies are subject to their own privacy policies, not this one. Please visit [http://www.networkadvertising.org/optout\\_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp) in order to learn more about the information collection practices and "opt-out" procedures of third-party ad servers we may use.

## 5. Links to Third-party Websites

Links of this Website may allow you to directly access websites operated by third parties, including, without limitation, our service providers (such as a third-party shopping cart service provider) or marketing providers. Some of these third-party marketing channels may be "co-branded" with a with our logo; even so, these third-party channels are not operated, controlled or maintained by AdventureGenie. These channels or links are provided for your convenience only and should be used with your discretion and prudent judgment. Links from our Website to third-party websites do not constitute sponsorship, endorsement, or approval of the content, policies or practices of such third-party websites. The collection and use of your information by such co-branding third parties is the responsibility of the co-branding partner. We are not responsible for any information these websites or digital channels may obtain and we do not oversee their policies or practices. This Privacy Policy does not apply to information provided to or gathered by the third parties that operate them. The privacy policies of these third-party websites may differ from ours. These websites may ask you for Personal Information. Please review the privacy policy on third-party channels before submitting information, because we do not have control over the use of information collected on these websites. Please review the



privacy policies and practices of these digital channels before providing any Personal Information.

## 6. Information Security

AdventureGenie makes reasonable efforts to ensure that our Internet Service Providers have implemented physical, electronic, administrative, and procedural security measures to assist with safeguarding your personal information, and to help protect against unauthorized access, disclosure, and/or destruction of your personal information. Only our authorized personnel and our Internet Service Providers who perform legitimate business functions for AdventureGenie are authorized to access your personal information.

Notwithstanding our efforts, the Internet and online services have inherent security risks. AdventureGenie cannot promise, and you should not expect, that your personal information, personal searches, and other communications will always remain secure. You should take care with regard to how you handle and disclose your personal information or any username or password that you are required to use to access services on this Website or online service.

## 7. Data Retention Periods

We will retain your information 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: [privacy@adventuregenie.com](mailto:privacy@adventuregenie.com). We will retain and use your information as necessary to comply with our legal and regulatory obligations, resolve disputes, and enforce our agreements. In such cases, we will ensure that your personal information will continue to be treated in accordance with this Privacy Policy.

## 8. Other Social Media Websites, Blogs, Message Boards

The Website may make other social media platforms available to you and other users. You are not required to provide any personal information when using these areas but you may choose to do so. If you post personal information online, it will be publicly available and you may receive unsolicited messages from other parties. In addition, when you post a comment on our Website, the user name with which you registered for the Website and your current location may be made publicly available on the Website. By using the commenting features of the Website, you acknowledge that your user name and location information will be disclosed. We cannot ensure the security of any information you choose to make public on social media platforms. Also, we cannot ensure that parties who have access to such publicly available information will respect your privacy. Please exercise caution when deciding to disclose personal information in these areas. To request removal of your personal information from our platform, contact us at [privacy@adventuregenie.com](mailto:privacy@adventuregenie.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

## 9. Canadian Residents

Canadian law provides residents of Canada certain individual rights with respect to the personal information that we hold about them. In addition to the rights set out in this Privacy Policy, you have the right to ask for access to your own personal information in our control. You also have the right to challenge the accuracy and completeness of your personal information, to amend it as appropriate, to delete it, or change how we use it subject to a limited number of exceptions prescribed by law.

We will respond to any requests within 30 days of receipt and authentication of your identity, or provide written notice where additional time is required to fulfill the request.

In some situations, we may decline to process requests if required by law. This may be the case where, for example, a request relates to information that is not associated with your personal information. If we are unable to fulfil your request, we will notify you in writing explaining why we are unable to do so and provide you with any further recourse available to you. In any case, where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort.

As noted in this Privacy Policy, information gathered through the Website may be transferred, processed, used, and stored in Canada, the United States, or in other countries where our service providers may be located. Please note personal information stored in other countries may also be subject to disclosure to authorized officials of governments or law enforcement of such other country, pursuant to the laws of such country. By using our Website, you consent to the transfer, process, use, and/or storage of your personal information as set out in this Privacy Policy.

You may withdraw your consent to our collection, use, and disclosure of your personal information at any time, subject to legal and/or contractual restrictions and by providing us with reasonable notice, but please note this may prevent you from using the Website.

**10.** If you have an objection to the use of your personal information as described in this Privacy Policy, you may file a complaint by sending an email to [privacy@adventuregenie.com](mailto:privacy@adventuregenie.com). We will attempt to accommodate your objection or complaint, but you understand that, to the extent you object to our processing of personal information that is necessary for us to provide our services to you, certain features and functionalities of the Website may no longer be available to you. Nothing in this Privacy Policy prejudices your rights to file a complaint with the Office of the Privacy Commissioner of Canada, and/or with any other applicable data protection authorities.

## **11. California Privacy Notice**

California law permits residents of California to request certain details about information we disclose to third parties for direct marketing purposes. If you are a California resident and would like to request this information, please contact us at the address listed below. Please note you are limited to one request per calendar year. In your request, please attest to the fact



that you are a California resident and provide a current California address for our response. This request may be made no more than once per calendar year.

Pursuant to applicable California law, including the California Consumer Privacy Act (CCPA), Adventure Genie makes the following disclosures regarding the personal information we have collected within the last 12 months:

<b>Category of Personal Information</b>	<b>Category of Source from Which Data is Collected</b>	<b>Purpose of Collection</b>	<b>Category of Third Parties to Whom Data is Disclosed</b>
Lead information such as product interests, timeline for purchase, and product accessories preferences	Directly from consumers	To provide to our dealer network in order to market and sell our products	Our partner network and other Service Providers
Contact information such as name, e-mail address, zip code	Directly from consumers	To provide to our dealers in order to market and provide our Services; to process warranties and rebates; to contact our end user customers	Our partner network and other Service Providers
Automatically collected information such as IP address, browser type, and device type	Cookies and other tracking technologies	To analyze and track usage; to determine the popularity of certain content; to deliver advertising and content targeted to user interests	Service Providers

AdventureGenie has not sold consumers’ personal information in the twelve (12) months preceding the Effective Date of this Privacy Policy. However, we do allow certain third-party advertising partners to collect information about the users of our Service for the purposes of serving ads that are more relevant, for ad campaign measurement and analytics, and for fraud detection and reporting. This activity can be considered a “sale” under California law.

You have the right to opt out of the “sale” of your Personal Information. Such requests may be submitted by as described in the How to Contact US section of our terms and conditions. You may also exercise your rights using the mechanisms described in the Interest Based Advertising section of this Policy above.

If you are a California resident, pursuant to the California Consumer Protection Act (CCPA), you have the right to request:

- the categories of personal information Adventure Genie has collected about you;
- the categories of sources from which your personal information is collected;
- the business or commercial purpose of collecting or selling your personal information;
- the categories of third parties with whom Adventure Genie shares your personal information;
- the specific pieces of personal information Adventure Genie has collected about you;
- the categories of personal information that Adventure Genie has sold about you and the categories of third parties to whom the personal information was sold, if applicable;
- deletion of your personal information; and
- an opt out of having your personal information disclosed or sold to third parties.

To submit a request, or designate an authorized agent to make a request under the CCPA on your behalf, please contact us at [privacy@adventuregenie.com](mailto:privacy@adventuregenie.com)<sup>2</sup>. To verify your identity when you submit a request, we will match the identifying information you provide us to the personal information we have about you. If you have an account with us, we will also verify your identity through our existing authentication practices for your account.

AdventureGenie will not be required to comply with your request to delete your personal information if it is necessary for AdventureGenie to maintain your personal information in order to:

- complete the transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of AdventureGenie's ongoing business relationship with you, or otherwise perform a contract between you and AdventureGenie;
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- debug to identify and repair errors that impair existing intended functionality;

---

<sup>2</sup> <mailto:privacy@adventuregenie.com>

- exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when AdventureGenie’s deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent;
- to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with AdventureGenie;
- comply with a legal obligation; or
- otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

AdventureGenie will not discriminate against you in the event you exercise any of the aforementioned rights under CCPA, including, but not limited to, by:

- denying goods or services to you;
- charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- providing a different level or quality of goods or services to you; or
- suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Some Internet browsers have incorporated “Do Not Track” features. Most of these features, when turned on, send a signal or preference (the “DNT Signal”) to the Websites you visit indicating that you do not wish to be tracked. Because there is not yet a common understanding of how to interpret DNT Signals, nor a common definition of “tracking,” we do not currently respond to DNT Signals on the Website.

This Policy is available to consumers with disabilities. To access this Policy in an alternative downloadable format, please [click here](#).

## 12. GDPR and UK-GDPR Data Subject Rights

Under the GDPR and UK-GDPR, in certain circumstances, an EEA-resident Data Subject has certain individual rights with respect to the personal information that we hold about them. You are entitled, under certain conditions, to obtain the personal data related to you in a structured, widely used, machine-readable format and to transfer this data to another

controller (data portability). Please send these types of requests to us via [privacy@adventuregenie.com](mailto:privacy@adventuregenie.com)<sup>3</sup>. In particular, you may also have the right to:

- Request access to any data held about you;
- Ask to have inaccurate data amended;
- Request data held about you to be erased, provided the data is not required by Adventure Genie to perform a contract, protect its rights, interests or those of a third party, defend against a legal claim or to comply with applicable laws or regulations;
- You are also entitled to object to and request limitation of the processing of your personal data and to request deletion of your personal data.
- Prevent or restrict processing of data which is no longer required; and
- Request transfer of appropriate data to a third party where this is technically feasible.

Additionally, in the circumstances where you may have provided your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific purpose at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

To exercise any of these rights, please contact us using the contact details set out under the “Contact Us” heading below. As a resident of the EEA, you are also entitled to direct any complaints in relation to our processing of your personal information to your national or local data protection authority (i.e., your Supervisory Authority).

AdventureGenie will not share any personal information about you with outside third-parties for their direct marketing purposes to the extent prohibited by California law, unless you agree otherwise as authorized by your prior written consent.

### 13. General Audience Web Website Not Directed Toward Children

This Website is a general audience Website. Our content is neither directed toward minors nor children who are under the age of 18. We do not knowingly collect personal information from children under the age of 18. If Adventure Genie App or our Internet Service Providers become aware that a minor or a child under the age of 18 has provided us with personal information without the parental consent, that information will be deleted from our databases. Parents who have questions about personal information that may have been submitted by a child under the age of 18 should email us at: [privacy@adventuregenie.com](mailto:privacy@adventuregenie.com).

---

<sup>3</sup> <mailto:privacy@adventuregenie.com>

## 14. Consent to Privacy Policy

We obtain your consent to collect, use, or disclose any personal information pursuant to this Privacy Policy. Your consent can be expressly provided, implicitly given, or provided through an authorized representative. However, there may be exemptions when we may collect, use, or disclose personal information without knowledge or consent, such as:

- if the personal information is publicly available from an authorized source; or
- where we are authorized or required by law.

By using the Website, you signify your agreement and provide consent to the terms of this Privacy Policy. We may amend this Privacy Policy at any time. If we make a material change to the way in which we collect, use, and/or share your personal information, we will post a notice on the Website and/or send an email to users who have provided an email address. We will assume that you have given your permission for your information to be used under the terms of the Privacy Policy, as modified, if you do not respond to our email within thirty days or continue to use the Website thirty days after a notice is posted. Please note that you should always update your personal information to provide us with a current email address.

## 15. Consent to Transfer

For those Website users located outside the United States, we advise you that your information may at times be accessible by individuals who are located worldwide including in countries that the European Commission or other geopolitical regions have not been determined to provide the same level of data protection as in your country, province, territory or geopolitical region. By providing us with your Personal Information, you are consenting to our use of it in accordance with AdventureGenie's privacy policy, including the transfer of your information across international boundaries to jurisdictions anywhere in the world as permitted by local law.

The United States may not have data privacy laws that are deemed to afford an equal level of protection for your Personal Information as those laws legislated at the direction of the European Union or similar geopolitical, national or regional legislative bodies. However, please be assured that AdventureGenie will continue to adhere to the principles stated in this Privacy Policy and will make reasonable efforts to comply with applicable international, national, regional, territorial, and provincial laws in connection with any information collected through the Website. AdventureGenie will endeavour to preserve the integrity, confidentiality, and security of personal information and afford such personal information reasonable level of protection.

## 16. Questions About This Privacy Policy

If you have any questions about this Privacy Policy or the privacy practices of this Website, or to lodge a complaint, please contact us by email at: [privacy@adventuregenie.com](mailto:privacy@adventuregenie.com).