



Effective April 24, 2009

JetLimo Privacy Policy

Your privacy is very important to JetLimo, Inc. ("we" or "us"). This Privacy Policy describes the principles and practices that apply to Personal Information (defined below) collected from users of our services ("you") on our Site, in telephone or e-mail communications, or in interviews, surveys, sweepstakes, contests, or raffles.

Simply put:

- We will not collect Personal Information without your knowledge and permission;
- We will not knowingly disclose your Personal Information to third parties, except as provided in this Privacy Policy;
- We will allow you to view, correct or remove your Personal Information; and
- We will take reasonable steps to protect the security of the Personal Information we collect from you.

The remainder of this policy describes our Personal Information handling practices in detail.

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1. Definitions

In this Privacy Policy, terms that commence with a capital letter are defined in this

Section or in the preamble.

"Guest" means an individual who can search and purchase Products or Services on the Site without being a Member.

"Member" means an individual who has registered with the Site. Members choose a Member ID and a password.

"Member ID" means the e-mail address you use (with your password) to login to our Site.

"JetLimo" or **"we"** means JetLimo, Inc. and its subsidiaries and affiliates.

"Personal Information" means any information, recorded in any form, about an identified individual, or an individual whose identity may be inferred from the information. This includes, for example, name, e-mail and mailing address and telephone number, billing and account information, and other information incidental to providing Products or Services (including information about individuals traveling with you).

"Products or Services" means the charter, airline travel, hotel accommodation, car rental, ground transportation, tours, theater tickets, attractions, travel insurance, and other items available from the Site.

To **"Purchase"** means to book, reserve or purchase.

"Session Data" means usage information, such as the type of Internet browser and operating system an individual use, the domain name of the site from which the individual came, the date, time and duration of the visit, number of visits, average time spent on the individual's site, pages viewed, domain name of the individual, and number of cookies accumulated.

"Site" means the www.jetlimo.com site, and their respective sub sites together with the respective content, Products and Services available from these sites and sub sites.

"Subscriber" means an individual who elects to receive offers or promotions from JetLimo without becoming a Member or a Guest.

2. Consent

BY SUBMITTING PERSONAL INFORMATION TO US, AND/OR BY USING OUR SITE, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW.

If you do not agree with these terms, do not provide any Personal Information to us. If you refuse or withdraw your consent, or if you choose not to provide us with any required Personal Information, we may not be able to provide you with Products or Services that can be offered on our Site only if we have access to certain Personal Information.

Minors

Minors (as defined under the laws of their jurisdiction or residence) are not eligible to register for, use, or Purchase the Products or Services available on our Site. We do not knowingly collect Personal Information from any Minor, and will not use this information if we discover that it has been provided by a Minor.

Other Travelers or Contacts

If you Purchase Products or Services for other persons using your Member ID and password, or if you provide us with contact information of a third party, you must make sure that you have the right to do so. By providing the Personal Information of another person, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose his or her Personal Information as set forth in this Privacy Policy.

3. What Personal Information we collect

We collect only such information as necessary to provide Products and Services to you.

When you are just visiting

You can visit certain areas of our Site without revealing who you are or signing-in.

When you visit our Site as a Visitor, Guest, or Member, we collect Session Data through Cookies and pixel tags.

When you register as a Member

If you register with us as a Member, we collect Personal Information that is necessary to provide the Products and Services offered on our Site. We require that you provide your name and e-mail address. You also need to choose a password, which will be required to gain access to portions of our Site reserved for Member use. We might also request your home zip code.

You may elect to provide other information, for example, gender, activities and lifestyle preferences or preferred destinations.

You may also elect to indicate your preferences for seat selection or meal requests, or provide details about your participation in loyalty or awards programs and applicable membership numbers, and other ticketing options.

When you Purchase Products or Services as a Member

When you Purchase Products or Services from our Site as a Member, you must provide payment or other necessary information. This includes, for example, billing information, driver information, or similar information as required by the service provider(s).

When you Purchase Products or Services for a third party

When you Purchase Products or Services for a third party using your Member ID and password, we will collect that third party's name and contact information, and other information as required by the service provider(s), so that we can complete the booking.

When you use the Site as a "Guest"

If you are not a Member, you may elect to use our Site as a Guest.

If you Purchase Products or Services as a Guest, you must provide Personal Information to complete the booking (for example, name, phone number, billing information), as required by the service provider(s). You must also provide an e-mail address, so that we can send you our welcome e-mail and a confirmation of the Purchase. With the confirmation, we will provide you with a temporary password so that you can return to the Site if you wish to review information about your Purchase.

When you "Subscribe"

When you become a Subscriber, we collect your name and email address, so that you may receive offers or promotions from JetLimo without becoming a Member or Guest.

When you participate in contests, promotions, raffles, or sweepstakes

We may offer you the chance to win a variety of related prizes by sponsoring contests, promotions, raffles, or sweepstakes. If you choose to participate, we will collect Personal Information, such as your full

name, e-mail address, or mailing address.

If a third party administers the contest, your participation may be subject to that other party's terms and conditions, and privacy policy. Detailed information about these terms will be provided on the applicable form you will be asked to fill out.

When you participate in a survey or a focus group

From time to time, we may invite you to participate in a survey or a focus group. You are free to participate or not. We will collect the responses you provide, and will make them anonymous to aggregate them with those of other participants.

When we advertise on third party sites

When you visit a site on which we advertise, and click through our advertisement, we may place cookies on your computer, or use pixel tags. The information that we collect through this technology is not personally identifiable.

When you call or write to our Customer Service

When you call or write to our Customer Service, we collect contact information (name, phone number, mailing address or e-mail address) and information about the relevant Purchase as necessary to assist you. For example, if you call for assistance with a preexisting Purchase, or to make a Purchase, we may request your contact and billing information.

When we send e-mails or e-newsletters

When we send e-mails, e-newsletters, or when you forward a promotion or search results to a third party, using the "Send to a Friend" feature, we may insert a pixel tag in the e-mail.

4. How we use the information we collect

We use Personal Information in order to provide and enhance the Products or Services offered on our Site:

- To record your preferences, to make reservations or acquire travel insurance on your behalf, or to communicate with you about your travel plans;
- To issue invoices, administer accounts, collect and process payments;
- To provide tips or guidance on how to use our Site, inform you of new

features on our Site, or provide other information that may be of interest to users;

- To personalize the service we provide to you, tailor your experience at our Site to your interests and make more appropriate recommendations;
- To send you e-mails, e-newsletters, personalized offers via direct messaging or other communications about our services, if you have subscribed to receive this information or you have not advised us that you do not wish to receive such communications;
- To manage our Site, diagnose technical problems, improve content, and allocate the resources of our systems so that your experience with our Site is as efficient as possible;
- To process and track your transactions and to send you information about our and our affiliates' and business partners' products and services and other information and materials that may be of interest to you;
- To develop, enhance, market, sell or provide JetLimo's Products or Services, or those of companies with which we have a commercial relationship, but only if you have granted us permission to do so or we are otherwise able to do so under applicable law;
- To evaluate credit standing and to match credit bureau or credit reporting agency information; to investigate, detect and protect JetLimo and other third parties against error, negligence, breach of contract, fraud, theft and other illegal activities;
- To effect a corporate transaction, in connection with the sale, merger, spin-off, or other corporate reorganization of our corporation, where the information is provided to the new controlling entity in regular course of business;
- To audit compliance with our policies and contractual obligations;
- As permitted by, and to comply with, any legal or regulatory requirements or provisions; or
- For any other purpose to which you consent.

Contests - Promotions - Raffles - Sweepstakes

If you participate in a contest, promotion, raffle, sweepstakes, we will only use your Personal Information to notify you if you win.

We may send you additional communications only if you have specifically requested to receive our newsletters, e-mails, personalized offers or other promotional materials when filling out the contest or promotion form.

We will share the information with the entities with which we may have teamed to propose the joint promotion.

If a third party administers the contest, your participation may be subject to additional terms and conditions and that third party's privacy

policy. We are not responsible for such third parties. You should carefully review these third parties' terms and conditions.

Session Data

We use Session Data, collected through , cookies and pixel tags to better understand how our Site is navigated, how many visitors arrive at specific pages, the length and frequency of stays at our Site, the variety of searches of our Site's database, the types of browsers and computer operating systems used by our visitors and the Internet Protocol addresses from which visitors connect to our Site

We also use this information to improve our Site content and ease of use, to personalize and improve your individual viewing experiences on our Site, and provide information that may be of interest to you.

Pixel Tags

We use pixel tags to monitor the open rate of our communications. This helps us understand the effectiveness of communications we send. We do not use this information for any other purpose.

Survey and Focus Groups

When you participate in surveys or focus groups, your participation and responses will be kept confidential, and will not be shared outside JetLimo without your permission, except with our service providers.

Aggregated Information

Aggregated information is information, recorded in any form, about more than one individual, where the identity of the individual is not known, and cannot be inferred from the information. We may use aggregated information to describe our user base to current or potential partners investors and advertisers; after a survey, to understand and respond to market needs and preferences; or to make recommendations to other users of our Site. For example, if users of our Site who have traveled to a particular destination told us that they had positive experiences at a hotel in that destination, we might recommend that hotel.

What we do NOT do

We do not and will not, at any time, request your credit card information, Member ID, login password, or national identification numbers in a non-secure or unsolicited e-mail or telephone

communication.

Identity theft and the practice currently known as "phishing" are of great concern to us. Safeguarding information to help protect you from identity theft is our priority. For more information about phishing, you may want to visit the Federal Trade Commission at <http://www.ftc.gov/bcp/online/pubs/alerts/phishingalrt.htm>.

5. To whom we disclose Personal Information

From time to time, we may disclose your Personal Information as follows:

- To those service providers with which you make arrangements through our Site, for example, charter operators, car rental, ground transportation, theater, attraction, or travel insurance. We provide them with the Personal Information needed to make and complete the purchase, booking, or reservation.
- To organizations that perform services for or on behalf of JetLimo, for example to provide customer service, deliver tickets, ship items, process credit cards, for research, marketing, data processing, to measure the use of our Site, to facilitate usage by a Visitor, or to offer credit card services or evaluate your creditworthiness. We will share with these companies only that Personal Information which they need to work on our behalf. Some of these service providers may be located in countries outside the US and outside the European Economic Area ("EEA"). Your Personal Information will be provided to these organizations only if they agree to use such information solely for the purpose of providing services to JetLimo, and under the instructions of JetLimo, and with respect to that information, to act in a manner consistent with the relevant principles articulated in this Policy. By submitting your personal data, you agree to the transfer, storing and processing of your data outside the US and outside the EEA.
- We may collaborate with other companies to offer you additional Products or Services, for example, through sweepstakes, raffles, and promotions. We will share Personal Information that is necessary for these other companies to provide the Products or Services that you have requested.

This policy will not cover the use of your Personal Information by these other companies. We encourage you to read a company's privacy policy before requesting any of its products or services.

- To protect our Site and our rights under our Terms and Conditions of Use ; to protect ourselves against liability or prevent fraudulent activity; or where it is necessary to permit us to pursue available remedies or limit any damages that we may sustain.
- To effect a corporate transaction, in connection with the sale, merger, spin-off, or other corporate reorganization of our corporation, where the

information is provided to the new controlling entity in regular course of business.

- Where the information is public.
- To our insurers and to regulatory agencies.

Disclosure without consent

Please note that there are circumstances where the use or disclosure of Personal Information may be justified or permitted, or where JetLimo may be obligated to disclose information without consent. Such circumstances may include:

- If required to comply with a subpoena or warrant issued or an order made by a court, person or body with jurisdiction to compel the production of information, or to comply with the rules or court relating to the production of records.

If we receive a formal request to disclose your Personal Information in connection with a legal action, we will attempt to contact you about it, if permitted by law, via the e-mail address you provided during registration, before we respond to that request.

- If we believe in good faith that a law, regulation, rule or guideline requires it.
- To a person who needs the information because of an emergency that threatens the life, health, or security of an identifiable person or group.
- Where it is necessary to collect monies owing to us.

National Security

In order to protect national security, and to ensure travel security, the United States Government and other governments may request access to passenger name records, which typically includes name, flight origin, flight destination, flight time, duration of flight, travel agent, form of payment, credit card numbers, travel itinerary, address, telephone number and meal requests. In response to such request, JetLimo and/or its providers will give access to all the information you provide at the time of making your reservation to the applicable government agencies of the countries to or from which you are traveling.

6. How we retain and store Personal information

My Account

If you are an JetLimo Member, we combine your Personal Information in what we call "My Account", which consists of "My Trips" and "My Account". You can access My Account from the Homepage of our Site, after logging onto our Site as a registered Member.

My Trips contains information about your current, canceled, or past trips.

My Account contains your name, e-mail address, password, and departure city from which you usually travel. It may also contain other information so that you do not need to re-enter it each time you Purchase a Product or Service. For example, My Account may contain your billing information unless you tell us not to store it. It may also contain your preferences for seat selection or special meals, details about your participation in loyalty or awards programs and applicable membership numbers, and other travel preferences.

We also keep in My Account all other information that you have elected to provide us, such as gender, favorite activities and lifestyle preferences, and favorite destinations.

My Account also contains a listing of the e-mails, e-newsletters and other communications we offer to send, and that you have elected to receive or not.

You can access, modify, or delete this Personal Information as described in How to access, modify, or delete your Personal Information.

Third Parties' Personal Information

We will retain in your My Stuff folder the Personal Information of individuals for whom you have made reservations or to whom we have sent Alerts on your behalf.

You can access, modify, or delete these third parties' Personal Information at any time.

Retention and storage

We will retain your Personal Information in our databases in accordance with our document management, retention and destruction policy and applicable laws. This period may extend beyond the end of your relationship with us, but it will be only as long as it is necessary for us to have sufficient information to respond to any issues that may arise later. For example, we may need or be required to retain information to allow

you to obtain credit for trip your Purchased but had to cancel. We may also need the retain certain information to prevent fraudulent activity; to protect ourselves against liability, permit us to pursue available remedies or limit any damages that we may sustain; or if we believe in good faith that a law, regulation, rule or guideline requires it.

Your Personal Information will be stored in secured locations, and on servers controlled by JetLimo, located either at our offices, or at the offices of our service providers, as described in How we protect Personal Information .

7. How we protect Personal Information

JetLimo employs physical, administrative and technical safeguards to help protect the confidentiality and integrity of Personal Information and to reduce the risk of loss, misuse, unauthorized access disclosure or modification of Personal Information. When Personal Information is sent to our service providers, we require, in our contracts with them, that they protect all Personal Information in a manner consistent with the principles articulated in this Privacy Policy.

If you choose to contact JetLimo through the Site, you should be aware that any information transmitted electronically via the World Wide Web might not be secure. JetLimo assumes no liability for the loss of any information that you transmit to us via the World Wide Web. However, should you choose to pay by credit card when making a booking, reservation or purchase on the Site, your card details are encrypted for the transaction.

In communicating with you, we may send e-mail as unencrypted plain text because we are aware that most Members, Guests, or Subscribers cannot readily process encrypted e-mail. This is done for your convenience, but with the security concern that, if misrouted or intercepted, it could be read more easily than encrypted e-mail.

8. How to access, modify or delete your Personal Information

If you wish to modify or delete other Personal Information, you can do so by contacting us as indicated in Contact Information.

If you request that we remove all of the Personal Information or travel records stored in My Account, we will promptly do so, to the extent possible. Once required Personal Information is removed from My Account, however, you will not be able to use many of the services available on our Site to Members, unless you re-register.

Please remember that we may not be able to honor your request if we are legally

obligated to retain that information, or for other reasons, as described in our Retention and Storage policy.

9. Privacy

Cookies and pixel tags

A Cookie is a small text file that our computer sends to your computer, and that your computer sends back to us each time you make a request from our Site. A cookie contains a unique identification number that identifies the visitor's browser, but not necessarily the visitor. A pixel tag is a small graphic image similar to a cookie.

When you access our Site, our computer may seek to place "cookies" or "pixel tags" on your personal computer to collect Session Data. Cookies and pixel tags are used to help us recognize you when you visit our Site again, or to help us customize your online experience. Unless a visitor specifically informs us of his/her identity (e.g. by registering with us), we will not know who the individual visitor is.

Most Internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or prompt you before accepting a cookie from the sites you visit.

If you decide not to accept our cookies, you will be able to access those parts of our Site that are available to the general public, but you will not be able to access many of the Products and Services offered at our Site.

Third Parties and Advertising

Third parties advertise on our Site, and we also contract with third parties to serve ads across the Internet. These third parties may serve ads about our products or services, or third party products or services in which, based on your Session Data, we or our business partners believe you may be interested. While we may share Session Data with third parties to help facilitate the serving of these ads, we do not share any Personal Information about you unless you give us permission to do so, separate from any permission you provide during the Member registration process. These third parties may seek to use cookies and pixel tags, including those collected on our Site, to track Session Data about the ads you have seen and types of things in which you appear interested. These third parties may also use combined information about your visits to our Site and other sites in order to provide advertisements about related goods and services that may be of

interest to you.

When you click on a third party advertisers' link from our Site, you will be taken off of our Site and will enter the third party's site. We are not responsible for such third party's sites. You should carefully review the privacy statements of any other site you visit, because those privacy statements will apply to your visit to that site, and may be very different from our policy.

Opting-Out

As part of the registration process, we give you the ability to receive via e-mail or direct messaging information about our Products and Services, updates to our Site, customized advertisements and promotions that are targeted to your specific interest, such as flight specials, promotions, contests, sweepstakes and other travel opportunities available on our Site and/or sponsored by our travel service providers and advertisers. We send this information directly ourselves, or via third party service providers.

If you do not opt-out from receiving these communications about our Site, we will send them to you.

In addition, in our e-mails and other communications, we will include instructions on how to unsubscribe and inform us of preferences if you decide you do not want to receive any future marketing or promotional e-mails from us.

Monitoring

JetLimo may from time to time monitor and review any information transmitted or received through the Site, or through telephone or email communications, for quality assurance and other purposes. We reserve the right to censor, edit, remove, or prohibit the transmission or receipt of any information that JetLimo deems inappropriate, or in violation of these Terms and Conditions. During monitoring, the information may be examined, recorded, or copied.

Links

For your convenience, our Site provides links to other sites. When you click on one of these links, you are leaving our Site and entering another site. We are not responsible for such third party sites. You should carefully review the privacy statements of any other sites you visit, because those privacy statements will apply to your visit to such other sites.

10. Changes to the Privacy Policy

Changes to the Privacy Policy and Changes in Ownership

We may change or supplement this Privacy Policy from time to time. We may also undergo a change of ownership. We will post an appropriate notice of changes to the Privacy Policy and changes or ownership on our Site. Privacy Policy changes will apply to the information collected from the date we post the revised Privacy Policy to the Site, as well as to existing information held by us.

If we decide to change this policy in a material way, we will obtain the necessary consents required under applicable privacy laws if we seek to collect, use or disclose Personal Information for purposes other than those to which consent has been obtained, unless otherwise required or permitted by law. If any proposed change is unacceptable to you, you may request that we remove your Personal Information.