

Privacy Policy

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Introduction

At Luxury Travel Services by Rob, LLC ("**Company**" or "**We**") we respect your privacy and are committed to protecting it through our compliance with this policy. We understand that you care about how information about you is collected, used, and shared. Keeping you informed about the data we collect and the choices you may have regarding your information is our top priority.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.luxtravelbyrob.com or any other sites or services hosted at the [luxtravelbyrob.com](http://www.luxtravelbyrob.com) domain names (our "**Website**") and our practices for collecting, using, maintaining, protecting, and disclosing that information. By using our Website or providing information to us in any other way, you agree that your information will be used in the manner described in this privacy policy.

This policy applies to information we collect:

- While you interact with the Website.
- In email, text, chat, and other electronic messages between you and this Website.
- Advertising hosted on third-party websites
- Information you supply while interacting with our social media accounts on services such as Facebook, Instagram, etc.

It does not apply to information collected by:

- Us offline or through any other means; or
- Any third party (including our affiliates and subsidiaries), including through any application or content that may be accessible on the Website.

It is our goal to be transparent about the use of your information so please read this policy carefully to understand our policies and practices. If you do not agree with our policies and practices, your choice is not to use our Website. This policy may change from time to time. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information by which you may be personally identified, such as your name, e-mail address, online identifiers, and if applicable, personal information required for the purchase or provisioning of travel services or personal information required to enable you to sell travel. Our website also automatically collects certain information about its

users, including information about your use of our Website, your internet connection, the device you use to visit our website, and other usage details.

We collect this information:

- Directly from you when you provide it to us, for example, when you interact with our Website, correspond with a member of our company, or provide information in connection with any request or inquiry.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies.

The technologies we use for this automatic data collection include, but are not limited to:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Analytics Tools.** We use Google Analytics and other analytics tools to collect information about the usage of our Website. This service collects information about how often users visit our Website, what pages they visit and when they visit, as well as what other websites they used prior to landing on our Website, among other additional information. We use this information to improve our Website and our services. We do not combine the information collected through the use of Google Analytics with Personal Information. You can opt-out of Google Analytics by installing the Google Analytics Opt-Out Browser Add-on.
- **Tracking Pixels or Web Beacons.** Pages of our Website and certain correspondence you receive from us may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, tracking pixels, and singlepixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).
- **Other Javascript tracking tools.** We also use other 3rd party tools which automatically collect data about the performance of our site and behavior in the browser to assist us with monitoring the performance and functionality of our site, tracking attribution, enabling a/b testing, monitoring site usability, etc. You can opt-out of these types of tools by enabling commonly available blocker plugins available as add-ons to all major web browsers.

Personal Information from other Sources

Luxury Travel Services by Rob may collect information, including personal information, from other third-party sources such as travel agents and travel or other hospitality service providers.

Third-Party Use of Tracking Technologies

We do not control any third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to present our Website and its contents to you, to provide you with information, products, or services that you request from us, to fulfill any other purpose for which you provide it, and in any way we may describe when you provide the information or with your consent.

Disclosure of Your Information

We may disclose personal information that we collect, or you provide as described in this privacy policy to our subsidiaries and affiliates, to service providers, and other third parties we use to support our business, or to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets.

We may also disclose your personal information, as necessary, to fulfill the purpose for which you provided it, and for any purpose with your consent.

Additionally, we may also disclose your personal information to comply with any court order, law, or legal process, including to respond to any government or regulatory request or if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Luxury Travel Services by Rob, our customers, or others.

We may disclose aggregated information that does not identify any individual without restriction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your email address used by the Company to promote our own or third parties' products or services, you can opt-out by clicking Unsubscribe at the bottom of any electronic communication you receive from us or if the communications are relating to your account as a Luxury Travel Services by Rob Advisor, by cancelling your subscription. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt out does not apply to information provided to the Company as a result of a booking enquiry, travel related transaction, or other business need to communicate relating to a transaction, product or service.

We do not control third parties' collection or use of your information to serve interestbased advertising. These third parties, however, may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

Your Nevada Privacy Rights

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to privacy@luxtravelbyrob.com. Please note, however, we do not currently sell data triggering that statute's opt-out requirements.

Data Security

We have implemented physical, electronic, and managerial procedures designed to secure your information from accidental loss and from unauthorized access, use, alteration, and disclosure.

- **SSL Certificate:** We employ secure web servers hosted in a certified data center. The "s" in the "https" address of our web pages, as well as security notices displayed by certain browsers, indicate that SSL is in use. A SSL (Secure Socket Layer) certificate is used for the secure encrypted exchange of data between your web browser and this Website using SSL encryption. This encryption helps safeguard personal information such as passwords, credit card numbers, and personal credentials.
- **Firewall Protection:** Once we have your information, we store it behind a firewall barrier designed to obstruct unauthorized access to or from our network.
- **Password and Username Verification:** For Website components which require a authentication, an additional step to protect your information is the use of a

unique username and password for your account. This helps prevent someone from impersonating you to access the information stored on the Website.

Unfortunately, the transmission of information via the internet cannot be guaranteed to be 100% secure or free of error. Although we do our best to protect your personal information, there are security and privacy limitations of the Internet which are beyond our control as information may flow across networks with little or no security measures and be viewed or tampered with in transit by a third party. We cannot be held responsible for unauthorized or unintended access that is beyond our control and any transmission of personal information is at your own risk. We urge you to take precautions to protect your personal data when making use of the Internet. Do not reuse your password across websites, change it often, and use a password phrase (such as a sentence) rather than a single word. It is your responsibility to keep your password confidential. Do not share this information with anyone. **We strongly recommend the use of a password manager for securely managing your passwords and the creation of strong passwords.**

Changes to Our Privacy Policy

We reserve the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Children Under the Age of 13

Our Website is not intended for children under 13 years of age. If you are under 13, do not use or provide any information on this Website. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information.

Luxury Travel Services by Rob may receive information about children under 13 years of age from a third-party, such as a travel agent. In those instances, the information will only be used to provide the services requested.

European Economic Area

Our Company's services, including our Website, are not targeted towards any customer located in the European Economic Area ("EEA"), and as such, is not subject to EU data protection law. By using our Website, any customer located in the EEA consents to have their personal information transferred, processed, and stored in the United States, and understands and consents to the collection and use of their personal information in accordance with the terms of this privacy policy.

California Residents

If you are a resident of the State of California, please read our "Privacy Policy for California Residents," which applies to you and your personal information. This document provided below.

CALIFORNIA EMPLOYEES AND APPLICANTS PRIVACY NOTICE

This notice applies solely to all job applicants, employees, owners, directors, officers, and contractors (collectively, "Employees") who reside in the State of California. We are committed to protecting the privacy of our Employees and to being transparent about the purposes for which we use their information.

Luxury Travel Services by Rob, LLC collects and uses Employees' Personal Information for human resources, employment, benefit administration, health and safety, other business-related purposes, and to be in legal compliance. Luxury Travel Services by Rob will not use Employees' Personal Information for any non-employment or role-related purposes. Below are the categories of Personal Information we collect or can collect from and about Employees and the purposes for which we intend to use that information:

- **Identifying information**, such as your full name, gender, date of birth, and signature.
- **Contact information**, such as your home address, telephone numbers, email addresses, and emergency contact information.
- **Dependent's or other individual's information**, such as their full name, address, date of birth, and Social Security numbers (SSN).
- **National identifiers**, such as SSN, passport and visa information, and immigration status and documentation.
- **Educational and professional background**, such as your work history, academic and professional qualifications, educational records, references, and interview notes.
- **Employment details**, such as your job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records.
- **Financial information**, such as banking details, tax information, payroll information, and withholdings.
- **Health and Safety information**, such as health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, vaccination status, and health insurance policy information.
- **Information Systems (IS) information**, such as your search history, browsing history, login information, and IP addresses on Company's information systems and networks.

- **Geolocation data**, such as time and physical location related to use of an internet website, application, device, or physical access to a Company office location.
- **Sensory or surveillance information**, such as COVID-19 related temperature checks and call monitoring and video surveillance.
- Profile or summary about an applicant/employee's preferences, characteristics, attitudes, intelligence, abilities, and aptitudes.
- **Demographic data**, such as race, ethnic origin, marital status, disability, and veteran or military status.

Luxury Travel Services by Rob collects Personal Information to use or disclose as appropriate to:

- Determining your suitability for a position with Luxury Travel Services by Rob, including processing and reviewing your application materials, conducting interviews, confirming your background and reference checks, and internal record keeping relating to our hiring process.
- Managing your employment relationship with Luxury Travel Services by Rob, including for onboarding processes, timekeeping, payroll, and expense report administration, benefits administration, employee training and development requirements, reaching your emergency contacts when needed, and workers' compensation claims management.
- Managing your professional development, including tracking job performance, conducting performance reviews, promotions, and responding to complaints of misconduct or conflicts of interest.
- Managing and monitoring employee access to company facilities, equipment, and systems, conducting internal audits and workplace investigations, and investigating and enforcing compliance with and potential breaches of Luxury Travel Services by Rob's policies and procedures.
- Engaging in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions or financing sources.
- Maintaining commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Performing workforce analytics, data analytics, and benchmarking.
- Administering and maintaining Luxury Travel Services by Rob's operations, including for safety purposes.
- For client marketing purposes.
- Exercising or defending our legal rights and complying with our legal obligations, including those related to tax and anti-discrimination laws.
- Any other routine business purposes.

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact info@luxtravelbyrob.com.