

ALYS BEACH PRIVACY POLICY

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This Alys Beach Privacy Policy sets forth Alys Beach's privacy practices when you use our websites and for information collected through the purchase of our products and services (collectively, the "Websites"), including:

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EBSCO Gulf Coast Development, Inc. and its subsidiaries (collectively, "Alys Beach" or "we" or "us" or "our") respects the privacy of its users and we are committed to protecting our users' privacy through our compliance with this Privacy Policy.

We want you to have a positive experience in connection with the Websites. Our goal is to provide you with an experience that delivers the information, resources, and services that are helpful to you. In order to achieve this goal, we may collect information from you. This Privacy Policy describes our information collection practices and the privacy principles we follow.

To exercise your privacy rights or to ask us questions about this Privacy Policy or our privacy practices, you can submit a request by contacting us using any of the methods provided in the "How Can I Exercise My Rights?" section of this Privacy Policy.

[What Information Is Collected and How is it Used?](#)

[A. What Information Do We Collect?](#)

1. Personal Information: Alys Beach collects, and has collected during the preceding 12-month period, the following categories of personal information (information that identifies you as an individual or relates to an identifiable individual) (collectively, “Personal Information”):

Category of Personal Information Collected	Categories of Sources from Which Personal Information is Collected	Business or Commercial Purpose(s) for Which Personal Information is Collected	Categories of Third Parties with Whom Personal Information is Shared
Personal Identifiers	<ul style="list-style-type: none"> • Individuals • Customers 	<ul style="list-style-type: none"> • Communications related to products, services, property information, and general contact information • Access to homeowner’s portal 	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms; communication providers; data analytics providers)
Internet or Other Electronic Network Activity Information	<ul style="list-style-type: none"> • Service Providers (operating systems and platforms; other information technology systems; data analytics providers) 	<ul style="list-style-type: none"> • Delivery, operation, and security of the Websites • Analytics • Improving the user experience 	<ul style="list-style-type: none"> • Service Providers (data analytics providers; internet service providers; operating systems and platforms)

If you submit any Personal Information relating to other individuals to us or to our service providers in connection with our Websites, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

2. Non-Personal Information: Alys Beach collects information that does not directly reveal your identity or does not directly relate to an identifiable individual. This may include a unique identifier (unconnected to an individual’s Personal Information) and related analytics and usage information that we use to track usage of our Websites, track trends in our Websites, administer the Websites, and improve our users’ experience.

B. How Do We Collect the Information?

The categories of sources from which we collect Personal Information are described in the table above.

We only collect and use Personal Information when you voluntarily provide it to us, with the exception of your IP address, geolocation, and certain device information which may be automatically captured when you access our Websites.

In order to use some portions of our Websites, a user must first complete a registration form or provide an email address that will require the user's disclosure of limited Personal Information. Such disclosure is strictly voluntary.

Because of how email communication works, you will have to disclose an email address to us if you choose to contact us or communicate with us by email.

We automatically collect non-Personal Information generated from your use of our Websites. We use this non-Personal Information in the aggregate. We do not combine these types of non-Personal Information with Personal Information. We may also share aggregated demographic information with our sponsors and companies that control, are controlled by, or are under common control with Alys Beach.

Cookies and Similar Technologies: For information about the cookies and other tracking technologies used by our Websites and how to manage your settings for these cookies and technologies, please visit our Cookie Policy.

Social Media Features: Our Websites may use social media features, such as the Facebook 'like' button ("Social Media Features"). These features may collect your IP address and which page you are visiting on our Websites, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on our Websites to a profile page of yours that is provided by a third-party Social Media network in order to share with others within your network. Social Media Features are either hosted by a third party or hosted directly on the Websites. Your interactions with these features are governed by the privacy policy of the company providing the relevant Social Media Features.

C. How Do We Use the Information?

The business or commercial purpose(s) for which Personal Information is collected is described in the table above.

We use the Personal Information we collect for limited purposes of processing your transactions, establishing the identity of account holders, customer service, authorization, customer support, content processing, content classification, warranty services, and providing you with information about our products and services. We will retain this information for as long as your account is active or as needed to provide you products and services, comply with our legal obligations, resolve disputes, and enforce our agreements. We also may use that Personal Information to improve and customize our content.

We may use the Personal Information and non-Personal Information we collect by sharing it with third party agents, vendors, contractors, partners, or content providers of Alys Beach (collectively, "Service Providers") for purposes of managing purchases of our products and services, servicing our systems, and obtaining support services for our businesses. We are not in the business of selling Personal Information to third parties or Service Providers and will share it with Service Providers only as we describe in this Privacy Policy. In situations where we share Personal Information with Service Providers, we ensure access is granted to the Service Providers only upon the condition that the Personal Information is kept confidential and is used only for carrying out the services these Service Providers are performing for Alys Beach. As part of making the determination whether we will share Personal Information with Service Providers, we will obtain assurances that they will appropriately protect and maintain the confidentiality of Personal Information consistent with this Privacy Policy and as required by applicable law.

The Personal Information we collect from you may be transferred to, and processed in, countries other than the country in which you live. These countries may have data protection laws that are different than the laws of your country. Specifically, the servers we use to provide our Websites are located in the United States. This means that when we collect your Personal Information, we may process it in the United States or the country where you live. However, when we process your Personal Information,

irrelevant of its processing location, we take appropriate measures, as discussed below, to ensure that your Personal Information remains protected in accordance with this Privacy Policy and as required by applicable law.

We may share your usage data related to our Websites with our affiliates and certain Service Providers for purposes of providing or improving our Websites. We will not disclose any information about your usage data related to our Websites to unaffiliated third parties, except as necessary to provide our Websites, enhance the product experience, to enforce the terms of use, or as required by law.

We also reserve the right to disclose your Personal Information if we are required to do so by law, or in the good faith belief that disclosure of the information is reasonably necessary to comply with legal process, to respond to claims, or to protect or advance the rights, property, safety, or well-being of our company, our employees, customers, or the public.

We will not use your Personal Information for automated-decision making.

In the unlikely event that all or substantially all of Alys Beach's assets are acquired, customer information, which may include Personal Information, may be one of the transferred assets unless restricted by applicable local law, in which case the acquiring entity will be subject to the same commitments for such customer information.

D. What is our Legal Basis for Collecting and Using Personal Information?

Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect Personal Information from you only:

- where we need the Personal Information to perform a contract with you or your organization;
- where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms; or
- where we have your consent to do so.

In some cases, we may also have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person.

If we ask you to provide Personal Information to comply with a legal requirement, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible impact if you do not provide your Personal Information).

Similarly, if we collect and use your Personal Information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact information provided below.

E. How Do We Secure Personal Information?

Alys Beach has taken appropriate technical and organizational measures to ensure that Personal Information we have collected or will collect in the future is secure. For example, we have limited the number of people who have access to the Personal Information, by electronic security systems and authentication methods that guard against unauthorized access. Any payment transactions will be encrypted using TLS/SSL technology.

As a reminder, Alys Beach may provide links to third-party websites. These websites may not have the same privacy policies as Alys Beach. We take reasonable care in recommending these websites, but we are not responsible for their content or privacy policies. We urge users to read the privacy statement of a

third-party website when leaving our Websites and linking to a third-party website.

We always use industry-standard technologies when transferring and receiving consumer data we receive. We have appropriate security measures in place in our physical facilities to protect against the loss, misuse, or alteration of information that we have collected from you in connection with our Websites.

F. What Are My Rights?

Depending on your country or state of residency, you may have legal rights with respect to your Personal Information, including one or more of the following (each of which may be subject to certain exceptions that will be analyzed on a case-by-case basis):

Right to be Informed	An organization must provide certain information to individuals when collecting and processing their Personal Information.
Right of Access / Right to Know	Individuals have a right to obtain confirmation as to whether their Personal Information is being collected and/or processed. Individuals also have a right to request that an organization disclose the Personal Information it collects, uses, discloses, sells, and/or otherwise processes.
Right to Rectification	Individuals have the right to require an organization to correct inaccurate Personal Information concerning the individual and to have incomplete Personal Information completed, including by means of providing a supplementary statement.
Right to Restrict Processing	Individuals have the right to require an organization to restrict the processing of their Personal Information.
Right of Data Portability	Individuals have a right to receive a copy of their Personal Information in a portable and readily usable (structured, commonly used, and machine-readable) format that can be transmitted to certain third parties without hindrance.
Right to Object or Opt-out	Individuals can request an organization to stop processing and/or selling (if applicable) their Personal Information.
Right to Withdraw Consent	Individuals have the right to withdraw their consent to the processing of their Personal Information at any time when the processing is based on the individual's consent. Withdrawal of consent does not affect processing that occurred prior to such withdrawal (it only has future effect).
Right to Erasure or Deletion	Individuals can request the deletion of their Personal Information collected or maintained by an organization.
Right to Non-discrimination	An organization cannot discriminate against an Individual because of the exercise of their legal rights with respect to their Personal Information.
Right to not be Subject to Automated Decision Making	Individuals have the right not to be subject to a decision based solely on automated processing, including profiling, if such processing has a legal effect or otherwise significantly affects the individual.

Right to Lodge a Complaint	If you are located in the European Union (EU) or European Economic Area (EEA), you have the right to lodge a complaint with a supervisory authority in relation to the processing of your Personal Information.
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Additional Information Regarding the Right to Know and the Right to Opt-out

Alys Beach does not and will not sell Personal Information to third parties for a business or commercial purpose and has not sold Personal Information to third parties for a business or commercial purpose during the preceding 12 months or at any other time. Likewise, because we do not collect Personal Information from children under 16 years of age, we do not and will not sell such information without affirmative authorization and have not sold such information during the preceding 12 months or at any other time.

We disclose, and have disclosed during the preceding 12-month period, the following categories of personal information to third parties for a business or commercial purpose:

Categories of Personal Information Disclosed
Personal Identifiers
Internet or Other Electronic Network Activity Information

Additional Information Regarding the Right to Object

If we process your Personal Information based on our legitimate interests, you can object to this processing in certain circumstances. In such cases, we will cease processing your Personal Information unless we have compelling legitimate grounds to continue processing or where it is needed for compliance and/or legal reasons. Where we use your Personal Information for direct marketing purposes, you can always object or opt-out by using the unsubscribe link in such communications or by submitting a request using any of the methods provided below.

G. How Can I Exercise My Rights?

We want to assure you that you can exercise any legal rights that you have with respect to your Personal Information. Upon request, we will tell you whether we have collected or processed any of your Personal Information.

If you would like to manage, change, limit, or delete your Personal Information, you can do so through your account settings on our Websites or by submitting a request using any of the methods provided below.

To exercise any other legal rights with respect to your Personal Information, you may submit a request using any of the methods provided below.

We will respond to your request as soon as reasonably possible, but no later than the legally required timeframe.

To exercise your rights (or to ask us questions about this Privacy Policy or our privacy practices), you can submit a request by contacting us using any of the methods below:

1. *Via Web:* Please click [here](#). (This hyperlink will redirect to our privacy management platform provided by our vendor, OneTrust, Inc.)
2. *Via Toll-Free Telephone:* 1-833-705-0124
3. *Via Mail:* Alys Beach
5724 Highway 280 E

Birmingham, AL 35242, USA
Attn: Data Privacy Officer, Legal Department

4. *Via Email:* privacy@ebSCO.com

Verification of Requests

All requests submitted to us will be verified to ensure that the person making the request (the “Requestor”) is the individual about whom we have collected Personal Information. The method we use to verify the Requestor’s identity may vary based on the type of customer or user, the products or services used, and the type of Personal Information we have collected. In most cases, we will require the Requestor to provide the following information when submitting a request:

- Type of Customer or User
- First Name
- Last Name
- Email Address
- Country
- State
- Legal Relationship to the Subject of the Request

We will use this identifying information to communicate with the Requestor and receive confirmation that they submitted the request, and then match this identifying information with the Personal Information we already maintain. We may also use the contact information that we already maintain to communicate with the individual to confirm that they submitted the request. In rare cases, we may ask for additional information to verify the request, which may include a signed declaration under penalty of perjury that the Requestor is the individual whose Personal Information is the subject of the request.

If the Requestor submits a request to delete Personal Information, we will separately confirm that the individual wants their Personal Information deleted.

We may deny a request if we cannot verify the identity of the Requestor to a reasonable degree of certainty or a reasonably high degree of certainty (depending on the type of request, the sensitivity of the Personal Information, and the risk of harm to the individual posed by a unauthorized request) or, in the case of a request to delete Personal Information, we may deny a request if we are not able to separately confirm that the individual wants their Personal Information deleted..

Authorized Agent

If you use an authorized agent to submit a request, we will require that you:

- provide the authorized agent written permission to act as your authorized agent; and
- verify the authorized agent’s identity directly with us.

The above authorized agent requirements do not apply if you have provided the authorized agent with legally binding power of attorney in accordance with applicable law.

We may deny a request from an agent that does not submit proof that they have been authorized by you to act on their behalf.

H. What Choices Do I Have?

We understand that you may not want to allow our disclosure of your Personal Information to our Service Providers, or to let us use that information for purposes that you believe may be incompatible with the purpose for which it originally was collected or that you later may authorize. Therefore, you

may contact us to inform us that you do not want to permit these uses of your Personal Information. To do so, please contact us using the contact information provided above.

It is important to us that the Personal Information we collect is appropriate and relevant to the purposes for which we intend to use it. We will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the person providing the information. Alys Beach will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete, and current.

You may sign-up to receive email newsletters or other marketing materials from us. If you would like to discontinue receiving this information, you may immediately update your email preferences free of cost by using the "Unsubscribe" link found in emails we send to you or through your account settings on our Websites or by submitting a request using any of the methods provided above.

I. Collection and Use of Information from Children

Our Websites are not intended for children under 16 years of age. No one under 16 years of age may provide any Personal Information to or on the Websites. The only Personal Information we collect from a child under 16 years of age is provided to us directly by the child's parent(s) or legal guardian(s) so we can create an amenity card for the child to use on our properties. Except as described above, we do not knowingly collect Personal Information from children under 16 years of age.

If you are under 16 years of age, do not use or provide any information on our Websites or on or through any of its features. If we learn we have collected or received Personal Information from a child under 16 years of age that was not provided directly by the child's parent(s) or legal guardian(s), we will delete that information. If you believe we might have any information from or about a child under 16 years of age that was not provided directly by the child's parent(s) or legal guardian(s), please contact us using the contact information provided above.

We do not and will not sell Personal Information from children under 16 years of age without affirmative authorization and have not sold such information during the preceding 12 months or at any other time.

J. How Long Do We Retain This Information?

We retain Personal Information we collect from you where we have an ongoing legitimate business interest or other legal need to do so (for example, to provide you with a product or service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no further legitimate business interest or legal need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

Questions

If you have any questions, comments, or concerns regarding this Privacy Policy or our practices, please send us an e-mail or write to us at the addresses found at that page or provided above.

Changes to Privacy Policy

We will notify you of changes to this Privacy Policy by posting an updated policy on this page. You agree that any use of the Websites is based on this Privacy Policy, current at the time of use. If we make any material changes, we will notify you by email notification or a notice on our Websites (such as a banner or pop-up) prior to the changes becoming effective and provide you with the ability to consent to these changes (such as an "I agree" or "OK" button, or a prominent statement indicating the changes are in

effect and continued use of the Websites signifies consent). We encourage you to periodically review this page for the latest information on our privacy practices.

Miscellaneous

Alternative Format / Accessibility: To access this Privacy Policy in an alternative format, click here to download a PDF version. If you have accessibility questions, please contact support@alysbeach.com.

Do Not Track Signals: Alys Beach does not recognize automated browser signals regarding tracking mechanisms, which may include 'do not track' instructions.