

# Wing It Travel LLC

## Privacy Policy

This privacy policy was last modified on April 25<sup>th</sup>, 2016.

Welcome to Wing It, the online and mobile service of Wing It Travel LLC, including any and all of our products, services, online and/or mobile applications. Our Privacy Policy explains how we collect, use, disclose, and protect information that applies to our Service, and your choices about the collection and use of your information.

### A. HOW WE COLLECT AND USE INFORMATION

Capitalized terms that are not defined in this Privacy Policy have the meaning given them in our Terms of Use [wingit.travel/terms](http://wingit.travel/terms).

We collect the following types of information about you:

*Information you provide us directly:* We ask for certain information such as your username, first and last name, birth date, phone number and e-mail address when you register for a Wing It account, or if you correspond with us. We may also retain any messages you send through the Service, and may collect information you provide in User Content you post to the Service. We use this information to operate, maintain, and provide to you the features and functionality of the Service.

*Information we may receive from third parties:* We may receive information about you from third parties. For example, if you access our websites or Service through a third-party connection or log-in, for example, through Instagram, by “following,” “liking,” adding the Wing It application, linking your account to the Wing It Service, etc., that third party may pass certain information about your use of its service to Wing It. This information could include, but is not limited to, the user ID associated with your account (for example, your Instagram UID), an access token necessary to access that service, any information that you have permitted the third party to share with us, and any information you have made public in connection with that service. If you allow us access to your followers list, your followers’ user IDs, and your connection to those followers’, may be used and stored to make your experience more social, and to allow you to invite your followers to use our Service as well as provide you with updates if and when your friends join Wing It. You should always review, and if necessary, adjust your privacy settings on third-party websites and services before linking or connecting them to the Wing It Service. You may also unlink your third party account from the Service by adjusting your settings on the third party service. If you unlink your third party account, we will remove the information collected about you in connection with that service.

*Finding your friends on Wing It:* If you choose, you can find friends with your Wing It account through your Wing It Profile and the “friends” feature. The “friends” feature

allows you to choose to locate friends either through (i) your contact list, (ii) social media sites (such as Instagram) or (iii) through a search of names and usernames on Wing It. If you choose to find your friends through your contact list, then you agree to provide Wing It access to your contact list such that we can perform the search necessary to determine whether or not someone associated with the information you provide is using Wing It. If you choose to find your friends through social media sites, then you understand that the information these sites provide to us to conduct this type of search is governed by their privacy policies and your account settings on those sites. If you choose to find your friends through a search of names or usernames then simply type a name to search and see if that name or username appears on our Service. Note that we do not retain any information contained in your contacts list, or information from social media sites about your contacts, and Wing It does not use such information for any purpose other than to help you find your friends on Wing It.

Wing It uses this information to operate, maintain, and provide to you the features and functionality of the Service, as well as to communicate directly with you, such as to send you email messages and push notifications, to allow you to locate others and have others locate you on the Service, and to permit you to share content with others on the Service. Wing It may also send you Service-related emails or messages (e.g., account verification, order confirmations, change or updates to features of the Service, technical and security notices). For more information about your communication preferences, see “Your Choices Regarding Your Information” below.

*Your “Likes” from Instagram:* If you choose, you can follow our Wing It community instagrammers. Once you decided to follow our influencers all “likes” associated with photos uploaded by one of the Wing It Influencers will be associated with a destination. Wing It will use your “likes” to understand what destinations it should help you find flights for. A tracking of these “Likes” will be captured in your Wing It profile. Wing It will use “likes” to all send you information related to providing you features and functionality of destination finding.

*Use of cookies and other technology to collect information.*

Wing It will automatically collect certain types of usage information when you visit our website or use our Service. When you visit the Service, Wing It may send one or more cookies — a small text file containing a string of alphanumeric characters — to your computer that uniquely identifies your browser and lets us help you log in faster and enhance your navigation through the site. A cookie may also convey information to us about how you use the Service (e.g., the pages you view, the links you click, how frequently you access the Service, and other actions you take on the Service), and allow us to track your usage of the Service over time. Wing It may collect log file information from your browser or mobile device each time you access the Service. Log file information may include anonymous information such as your web request, Internet Protocol (“IP”) address, browser type, information about your mobile device, referring / exit pages and URLs, number of clicks and how you interact with links on the Service,

domain names, landing pages, pages viewed, and other such information. Wing It may employ clear gifs (also known as web beacons) which are used to anonymously track the online usage patterns of our Users. In addition, Wing It may also use clear gifs in HTML-based emails sent to our users to track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Service. Wing It may also collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Service. These tools collect information sent by your browser or mobile device, including the pages you visit, your use of third party applications, and other information that assists us in analyzing and improving the Service.

When you access our Service by or through a mobile device, we may receive or collect and store a unique identification numbers associated with your device (“Device ID”), mobile carrier, device type and manufacturer, phone number, and, depending on your mobile device settings, your geographical location data, including GPS coordinates (e.g. latitude and/or longitude) or similar information regarding the location of your mobile device.

Wing It use or may use the data collected through cookies, log file, device identifiers, location data and clear gifs information to: (a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; (b) provide custom, personalized content and information, including advertising; (c) provide and monitor the effectiveness of our Service; (d) monitor aggregate metrics such as total number of visitors, traffic, usage, and demographic patterns on our website and our Service; (e) diagnose or fix technology problems; (f) otherwise to plan for and enhance our Service; and (g) automatically update the Wing It application on your mobile devices.

## *B. SHARING OF YOUR INFORMATION*

Wing It may share your personal information in the instances described below. For further information on your choices regarding your information, see the section below called, “Your Choices Regarding Your Information.”

Remember, our Services allow you to connect with others and share information about yourself with other individuals. Your profile information, including your name, photo, location and other personal information, will be available publicly to other members of the Service by default and may be searchable by search engines which may display certain of your information publicly. By using the Service, you consent to have your profile information and your location displayed to other members of the Service. Consider your own privacy and personal safety when logging in to our Service and sharing your information with anyone.

Wing It may also share your personal information with:

- Third party vendors, consultants and other service providers that perform services on Wing It's behalf, in order to carry out their work for Wing It, which may include identifying and serving targeted advertisements, content or service fulfillment, or providing analytics services;
- Third parties who Wing It believes may offer you products or services you may enjoy;
- The public and other members of the Service at your request. Any information or content that you voluntarily disclose for posting to the Service, such as User Content, becomes available to the public, as controlled by any applicable privacy settings. To change your privacy settings on the Service, please change your profile setting. Subject to your profile and privacy settings, any User Content that you make public is searchable by other Users and subject to use under our Wing It API. Any party that uses the Wing It API is subject to the API Terms of Use [insert link] which incorporates the terms of this Privacy Policy. If you remove information that you posted to the Service, copies may remain viewable in cached and archived pages of the Service, or if other Users have copied or saved that information;
- With other members of the Service so that you can be "found" on the Service. When other members of the Service attempt to "Find Friends" on the Service using their contact list or address book, Wing It will identify you as an existing member of the Service if your phone number is in your friend's address book. Similarly, Wing It will let you know which of your contacts in your address book are already members of the Service based on the phone number associated with the member's account;
- Other parties in connection with any Wing It transaction, such as a merger, sale of Wing It assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another Wing It or third party or in the event of bankruptcy or related or similar proceedings; and
- Third parties as required to (i) satisfy any applicable law, regulation, subpoena/court order, legal process or other government request, (ii) enforce our Terms of Use Agreement, including the investigation of potential violations thereof, (iii) investigate and defend ourselves against any third party claims or allegations, (iv) protect against harm to the rights, property or safety of Wing It, its users or the public as required or permitted by law and (v) detect, prevent or otherwise address criminal (including fraud or stalking), security or technical issues.

*Ads on Wing It:* Wing It may also share certain information such as your location, browser and cookie data and other data relating to your use of our Service with our business partners to deliver advertisements ("ads") that may be of interest to you. Wing It may allow third-party ad servers or ad networks to serve advertisements on the

Service. These third-party ad servers or ad networks use technology to send, directly to your browser or mobile device, the ads and ad links that appear on the Service, and will automatically receive your IP address when they do so. They may also use other technologies (such as cookies, JavaScript, device identifiers, location data, and clear gifs, see above) to compile information about your browser's or device's visits and usage patterns on the Service, and to measure the effectiveness of their ads and to personalize the advertising content.

Please note that an advertiser may ask Wing It to show an ad to a certain audience of Users (e.g., based on demographics or other interests). In that situation, Wing It determines the target audience and Wing It serves the advertising to that audience and only provides anonymous aggregated data to the advertiser. If you respond to such an ad, the advertiser or ad server may conclude that you fit the description of the audience they are trying to reach.

The Wing It Privacy Policy does not apply to, and we cannot control the activities of, third-party advertisers. Please consult the respective privacy policies of such advertisers or contact such advertisers for more information.

### *C. HOW WE STORE AND PROTECT YOUR INFORMATION*

*Storage and Processing:* Your information collected through the Service may be stored and processed in the United States or any other country in which Wing It or its subsidiaries, affiliates or service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which Wing It or its parent, subsidiaries, affiliates or service providers maintain facilities and the use and disclosure of information about you as described in this Privacy Policy.

*Keeping your information safe:* Wing It cares about the security of your information, and uses commercially reasonable safeguards to preserve the integrity and security of all information collected through the Service. To protect your privacy and security, we take reasonable steps (such as requesting a unique password) to verify your identity before granting you access to your account. You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to your email communications from Wing It, at all times. However, Wing It cannot ensure or warrant the security of any information you transmit to Wing It or guarantee that information on the Service may not be accessed, disclosed, altered, or destroyed. Your privacy settings may also be affected by changes to the functionality of third party sites and services that you add to the Wing It Service, such as social networks. Wing It is not responsible for the functionality or security measures of any third party.

*Compromise of information:* In the event that any information under our control is compromised as a result of a breach of security, Wing It will take reasonable steps to investigate the situation and where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.

#### D. YOUR CHOICES ABOUT YOUR INFORMATION

*Commercial and marketing communications:* We use the information we collect or receive to communicate directly with you. We may send you emails containing newsletters, promotions and special offers. If you do not want to receive such email messages, you will be given the option to opt out or change your preferences. We also use your information to send you Service-related emails (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the Service, technical and security notices). You may not opt out of Service-related e-mails. You will also be able to be “found” on Wing It based on information that you provide (see “Find friends on Wing It”) above.

*You control your account information and settings:* You may update your account information and email-communication preferences at any time by logging into your account and changing your profile settings. You can also stop receiving promotional email communications from us by clicking on the “unsubscribe link” provided in such communications. We make every effort to promptly process all unsubscribe requests. As noted above, you may not opt out of Service-related communications (e.g., account verification, purchase and billing confirmations and reminders, changes/updates to features of the Service, technical and security notices). If you have any questions about reviewing or modifying your account information, you can contact us directly at Eileen.p.kelly@gmail.com.

*Online Advertising.* We may permit third party online advertising networks to collect information about your use of our website over time so that they may display ads that may be relevant to your interests on our Service as well as on other websites or apps. Typically, the information collected for this purpose is collected through cookies or similar tracking technology. The only way to completely opt out of the collection of any information through cookies or other tracking technology is to actively manage the settings on your browser or mobile device. Please refer to your mobile device or browser’s technical information for instructions on how to delete and disable cookies, and other tracking/recording tools. (To learn more about cookies, clear gifs/web beacons and related technologies, you may wish to visit <http://www.allaboutcookies.org> and/or the Network Advertising Initiative’s online resources, located at <http://www.networkadvertising.org>). Depending on your type of device, it may not be possible to delete or disable tracking mechanisms on your mobile device. Note that disabling cookies and/or other tracking tools prevents Wing It or its business partners from tracking your browser’s activities in relation to the Service, and for use in targeted advertising activities by third parties. However, doing so may disable

many of the features available through the Service. If you have any questions about opting out of the collection of cookies and other tracking/recording tools, you can contact us directly at [Eileen.p.kelly@gmail.com](mailto:Eileen.p.kelly@gmail.com).

*How long we keep your User Content:* Following termination or deactivation of your User account, Wing It may retain your profile information and User Content for a commercially reasonable time for backup, archival, or audit purposes.

#### E. "DO NOT TRACK"

Although we do our best to honor the privacy preferences of our customers, we are not able to respond to Do-Not-Track signals from your browser at this time. As discussed above, we track website usage information through the use of cookies for analytic and internal purposes only. Because we do not collect this information to track you across websites over time, your selection of the "Do Not Track" option provided by your browser will not have any effect on our collection of cookie information for analytics or internal purposes.

#### F. CHILDREN'S PRIVACY

Wing it does not knowingly collect or solicit any information from anyone under the age of 13 or knowingly allow such persons to register as Users. The Service and its content are not directed at children under the age of 13. In the event that we learn that we have collected personal information from a child under age 13 without verification of parental consent, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under 13, please contact us at [Eileen.p.kelly@gmail.com](mailto:Eileen.p.kelly@gmail.com).

#### G. LINKS TO OTHER WEB SITES AND SERVICES

We are not responsible for the practices employed by websites or services linked to or from the Service, including the information or content contained therein. Please remember that when you use a link to go from the Service to another website, our Privacy Policy does not apply to third-party websites or services. Your browsing and interaction on any third-party website or service, including those that have a link or advertisement on our website, are subject to that third party's own rules and policies. In addition, you agree that we are not responsible for and we do not have any control over any third-parties that you authorize to access your User Content. If you are using a third-party website or service (like Instagram) and you allow such a third-party access to your User Content you do so at your own risk. This Privacy Policy does not apply to information we collect by other means (including offline) or from other sources other than through the Service.

#### H. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the Service, please contact us at [Eileen.p.kelly@gmail.com](mailto:Eileen.p.kelly@gmail.com)

## *I. CHANGES TO OUR PRIVACY POLICY*

Wing It may modify or update this Privacy Policy throughout time to reflect the changes in our business and practices, and thus it is recommended you review this page periodically. If we do change the policy in substantial manner, Wing It will update the last modified date found at the top of this page.