

PRIVACY POLICY

Effective Date: January 31, 2020

To review material modifications and their effective dates scroll to the bottom of the page.

CJA Corporation DBA Vanguard Key Clubs ("Vanguard Key Clubs") owns and operates this vanguardkeyclubs.com website business. All references to "we", "us", this "website" or this "site" shall be construed to mean Vanguard Key Clubs.

This Privacy Policy describes our collection, use, and sharing of information, including the sharing of information with our marketing partners for purposes of serving personalized ads based on your interests. Our marketing partners include third party service providers, advertisers, advertising networks and platforms, advertising agencies, and data brokers and aggregators. (See below, PERSONALIZED ADS.)

Our Privacy Policy applies to all of the services offered by us and our affiliated entities, including services accessed by mobile devices and application programming interface (API), but excludes services that have separate privacy policies which do not incorporate this Privacy Policy.

Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, web beacons (pixel tags), and other methodologies to serve personalized ads.

HOW WE MODIFY THIS PRIVACY POLICY

We may modify this Privacy Policy at any time, and without prior notice, by posting an amended Privacy Policy that is always accessible by clicking on the "Privacy Policy" link on this site's home page. Your continued use of this site indicates your acceptance of the amended Privacy Policy.

Regarding Personal Information (defined below), if any modifications are materially less restrictive on our use or disclosure of the Personal Information previously disclosed by you, we will obtain your consent before implementing such revisions with respect to such information.

THE TYPES OF INFORMATION WE COLLECT

Personal Information. "Personal Information" includes any information regarding a natural person that may be used directly to identify the person.

Personal Information that we collect may vary with each separate purpose for which you provide it, and it may include one or more of the following categories: name, physical address, an email address, phone number, credit card information including credit card number, expiration date, and billing address, and location data.

We also may collect publicly available Personal Information posted on social media platforms and profiles. When you engage with our content on or through social media platforms or other third party platforms, plug-ins, integrations or applications, you may allow us to have access to certain Personal Information in your profile that you have added to these platforms. This may include your name, e-mail address, photo, gender, birthday, location, an ID associated with the applicable third-party platform or social media account user files, "like" photos and videos, your list of friends or connections, people you follow and/or who follow you, or your posts or "likes."

Passively or Automatically Collected Data ("Usage Data").

We, our affiliated entities, and our marketing partners including third party service providers, advertisers, advertising networks and platforms, advertising agencies, and data brokers and aggregators may use automated means to collect various types of information about you, your computer or other device used to access this site or its services. This information is based on your usage of this site, including information collected automatically from this site (or by our marketing partners employed in this site).

A representative, non-exhaustive list of the types of passively or automatically collected information may include: network or Internet protocol address and type of browser you are using (e.g., Chrome, Safari, Firefox, Internet Explorer), the type of operating system you are using, (e.g., Microsoft Windows or Mac OS), the name of your Internet service provider (e.g., Comcast, Verizon or AT&T) and domains used by such providers, mobile network, device identifiers (such as an Apple IDFA or an Android Advertising ID), device settings, browser settings, the web pages of this site you have visited, pages or service visited before and after you visit a page or service, the type of handheld or mobile device used to view the page or service (e.g., iOS, Android), location information, and the content and advertisements you have accessed, seen, forwarded and/or clicked on, the various time details per visit (e.g., the time spent on each page or service within the site) and the details about the path followed within the site with special reference to the sequence of pages visited, other parameters about the device operating system and/or the user's IT environment, and conversion rates and marketing and conversion data and statistics, reports and analytics, including without limitation your interactions to emails we send, and reviews and surveys regarding this site or any products listed on this site. Usage Data is essentially anonymous when collected, but could be used indirectly to identify a person.

Geo-Location Data. If you are accessing a page or service from a computer or a mobile device, you may be asked to share your precise (GPS level) geo-location information with us so we can customize your experience on our services or on other services when we work with a marketing partner such as a third party service provider, advertiser, advertising network and platform, advertising agency, and a data broker or aggregator. If you agree to the collection of location data, in most cases, you will be able to turn off such data collection at any time by accessing the privacy settings of your mobile device.

Data Collected Via Social Media Platforms and Other Third-Party Sources. When we interact with you through our content on social media platforms, third-party platforms, third-party websites, applications, integrations, and services of our marketing partners, we may obtain any information regarding your interaction with that content, such as content you have viewed, your game performance, high scores, and information about advertisements within the content you have been shown or may have clicked on. For a description on how social media services and other third party platforms, plug-ins, integrations or applications handle your information, please refer to their respective privacy policies and terms of use, which may permit you to modify your privacy settings.

HOW AND WHEN WE COLLECT INFORMATION

Personal information. We collect Personal Information at the time you provide it to us. We collect Personal Information through sign-up forms and as part of your registration for an account, product, or service, promotion, or contest from this website. Personal Information that we collect may vary with each sign-up or registration. In addition, we collect personal information from all communications with site visitors including without limitation, text messages, faxes, telephone calls, and regular "snail mail", as well as from third-party outside sources including data brokers and aggregators. As indicated above, we may collect publicly available Personal Information posted on social media profile information including photos both directly and through the use of contact management applications.

Your Communications With Us. We collect Personal Information that we receive from you as you communicate with us. If you complete a signup form subscribing to information from our site or to participate in our mailing list activities, we will receive your Personal Information from our email services and/or autoresponder service.

Usage Data. We collect Usage Data as you use this site, including your interactions with emails we send, and via social media platforms, third-party platforms, third-party websites, applications, integrations, and services of our marketing partners. This data may be passively or automatically collected (that is, gathered without your actively providing the information) using various analytics and reporting technologies, such as cookies, web beacons, locally stored objects, and mobile device identifiers and SDKs, and other similar methodologies as well as similar technologies developed in the future. (See below, SPECIFIC INFORMATION ABOUT COOKIES AND WEB BEACONS.)

HOW WE USE YOUR INFORMATION

We may use your Personal Information and Usage Data for the performance of the services or transaction for which it was given and for the basic purpose of this site. We may use your Personal Information in connection with other products, services, promotions, personalized ads, or contests we may offer, and our private, internal reporting for this site, and security

assessments for this site. We may also send you messages related to certain features or your activity on this site. We may also send you news or updates about changes to our site or services. By default, you will receive these messages via email.

We may use publicly available Personal Information posted on social media profile information including photos for purposes of assisting us, and our marketing partners with marketing and advertising activities and with contact management.

We may make full, unrestricted use of Usage Data for any purpose in our sole discretion, including without limitation, to customize or personalize ads, offers and content made available to you based on your visits to and/or usage of this site or its services, and to analyze the performance of those ads, offers and content, as well as your interaction with them.

We may combine and use the Personal Information and Usage Data we collect from all services and products offered by us and our affiliated entities over various websites to provide, protect, and improve them, and to develop and offer new services and products. We will treat you as a single user of these combined services and products. We may also use this information to provide you personalized ads.

INFORMATION SHARING AND DISCLOSURE

General Disclosure Policy. We may share and disclose your Personal Information as described below. We may share and disclose Usage Data without restriction, including without limitation, as described below.

Affiliated Entities. We may provide your Personal Information and Usage Data to any affiliated entities we may have, including our subsidiaries. Affiliated entities are entities that we legally control (by voting rights) or that control us.

Service Providers. We may provide access to your Personal Information and Usage Data to our trusted service providers that assist us with the operation and maintenance of this site. For example, we may contract with third parties to finance purchases from this site, process payments, host our servers, provide security, and provide production, fulfillment, optimization, analytics, reporting, and software maintenance and development services. In addition, our service providers will be given access to your information only as is reasonably necessary to provide the services for which they are contracted.

Successors. If we sell or otherwise transfer part or all of our business or assets to another organization, such as in the course of an acquisition, merger, bankruptcy or liquidation, we may transfer your Personal Information and Usage Data. In such an event, we will require the buyer or transferee to agree to our commitments provided in this Privacy Policy.

Legal Process, Enforcement and Security Notice. We may disclose your Personal Information

and Usage Data if we have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary (i) to satisfy any applicable law, regulation, legal process or enforceable governmental request (such as for example, to comply with a subpoena or court order), (ii) to detect, prevent, and address fraud or other illegal activity, and (iii) to investigate, respond to, or enforce violations of our rights or the security of this site.

Joint Venture Partners. We may participate with another company or individual for purposes of jointly promoting our products, services, promotions or contests or their products, services, promotions, or contests. We may disclose your Personal Information and Usage Data to them for purposes of (i) compensation, transaction processing, fulfillment, and support, and (ii) for purposes of offering you other products, services, promotions, and contests. These joint venture marketing partners may also contact you regarding other products, services, promotions, or contests.

Marketing Partners. We may share your Personal Information and Usage Data with our marketing partners including third party service providers, advertisers, advertising networks and platforms, advertising agencies, and data brokers and aggregators to serve and offer personalized ads.

With Your Consent. We may share your Personal Information with other parties with your consent.

Your California Privacy Rights. Under California Law SB 27, California residents have the right to receive, once a year, information about third parties with whom we have shared information about you or your family for their marketing purposes during the previous calendar year, and a description of the categories of personal information shared. To make such a request, please send an email to the email address provided in our contact information below and include the phrase "California Privacy Request" in the subject line, the domain name of the Web site you are inquiring about, along with your name, address and email address. We will respond to you within thirty days of receiving such a request.

SPECIFIC INFORMATION ABOUT COOKIES AND WEB BEACONS

In order to provide better service for our site, we and our marketing partners may use cookies and other data collection methodologies discussed below to collect Usage Data to store your preferences and information about what pages you visit and past activity at our site and other websites. This information helps us and our marketing partners display personalized ads, compile aggregated statistics regarding the effectiveness of our promotional campaigns or other operations of our site. For information about cookies from the FTC website visit --> <https://www.consumer.ftc.gov/articles/0042-online-tracking> .

"Cookies" are tiny pieces of information stored by your browser on your computer's hard drive. Cookies are also used to customize content based on your browser. Most browsers are initially

set to accept cookies. If you want to disable cookies, there is a simple procedure in most browsers that allows you to turn off cookies. Please remember, however, that cookies may be required to allow you to use certain features of our site.

Flash Cookies - third party cookies that use an Adobe Flash Media Player local shared object (LSO) - may be used along with other third party cookies for purposes of crediting any purchase you may make on this site to one of our joint venture partners that may have referred you to us. These cookies will be used for purposes of crediting sales to the referring joint venture marketing partner. Flash cookies are not the same as "browser cookies". The Adobe Flash Media Player is software that enables users to view content on their computers. Flash cookies are also accompanied by a browser cookie. If you delete the browser cookie, the Flash cookie may automatically create (or re-spawn) a replacement for the browser cookie.

Web Beacons (sometimes called single-pixel gifs or clear gifs) are used to assist in delivering cookies, and they allow us to count users who have visited pages of our site. We may include Web Beacons in promotional e-mail messages or our newsletters in order to determine whether messages have been opened and acted upon.

Locally Stored Objects – we may employ locally stored objects ("LSOs") and other client-side storage tracking technologies in certain situations where they help to provide a better user experience, such as to remember settings, preferences and usage similar to browser cookies, or in order to target or help our Partners target ads, analyze ad performance, or perform user, website or market analytics. For LSOs utilized by Adobe Flash you can access Flash management tools from Adobe's website: -->

http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html . In addition, some, but not all browsers, provide the ability to remove LSOs, sometimes within cookie and privacy settings.

PERSONALIZED ADS

We may participate with our marketing partners for purposes of providing personalized ads based on your interests. This activity is performed by collecting Usage Data and by using cookies and other tracking and data collection methodologies discussed above to transfer information to our marketing partners which manage advertising activities.

Our marketing partners may also use cookies and other tracking and data collection methodologies discussed above to measure advertisement effectiveness and for other purposes that are disclosed in their own privacy policies. We have no access or control over these cookies and other tracking and data collection methodologies that may be used by our marketing partners, and we have no responsibility or liability for the privacy policies and practices of these sites.

AdWords (Google) - We may participate in AdWords program which is a personalized ad

service provided by Google Inc. that connects the activity of this site with the Adwords advertising network and the Doubleclick cookie. Information collected: cookie and Usage Data. For the opt-out, visit --> <https://support.google.com/ads/answer/2662922?hl=en>

Google Analytics for Display Advertising (Google) - We may participate in any and all of the following Google Analytics Advertising Features provided by Google: Google Analytics, Google Display Network Impression Reporting, the DoubleClick Campaign Manager integration, and Google Analytics Demographics and Interest Reporting. These features use first party cookies (such as the Google Analytics cookie) for connecting the tracking activity performed by Google Analytics and its cookies with the Adwords advertising network and the DoubleClick cookie (a third-party cookie). Information collected: cookie and Usage Data, including audience data such as age, gender, and interests. For the opt-out, visit --> <https://support.google.com/ads/answer/2662922?hl=en> You may opt-out of the Google Analytics service with the Google's Browser Add-on that's available at --> <https://tools.google.com/dlpage/gaoptout>

For information in general about Google's personalized ad campaigns, and specifically about information regarding DoubleClick cookies and how to control and manage Google's advertising cookies for these campaigns, visit --> <http://www.google.com/policies/technologies/ads/>

For another Google resource for opting out of Google's use of cookies, visit --> <http://www.google.com/settings/ads>

For information regarding how Google uses data when you use Google's partners' sites or apps, visit --> <http://www.google.com/policies/privacy/partners/>

For an additional resource recommended by Google for opting out of a third party vendor's use of cookies, visit --> http://www.networkadvertising.org/managing/opt_out.asp

Custom Audience (Facebook). We may participate in Facebook.com's Custom Audience program which enables us to display personalized ads to persons on our email lists when they visit Facebook.com. We provide Personal Information such as your email address and phone number to Facebook to enable Facebook to determine if you are a registered account holder with Facebook. You may opt-out of participation in our Facebook Custom Audience by sending an email, from the email address you are opting out of, to the email address provided in our contact information below. For your opt-out to be effective, you must: (i) place the following text in the subject line of the email - "Opting Out of Facebook.com Website Custom Audience Ads", and (ii) in the body of the email, include your name and email address. We will forward your name and email address to Facebook.com with a request to delete you from all of our Facebook Custom Audience Ads.

Tailored Audiences/Conversion Tracking Programs (Twitter). We may participate in

Twitter.com's Tailored Audiences/Conversion Tracking Programs which enable us to display personalized ads. You may opt-out of participation in these programs by visiting <https://support.twitter.com/articles/20170405> .

Other Personalized And Behavioral Advertising Services. We may participate in additional retargeting and behavioral advertising services that will be similar to the services described above.

Managing Personalized Ads. You can control the placement of cookies and other data collection methodologies for purposes of opting out.

Managing Cookies Via Your Browser. You should note that although most browsers are initially set up to accept cookies, you may be able to change your browser settings to cause your browser to refuse first party or third-party cookies or to indicate when a third-party cookie is being sent. However, disabling or limiting cookies may cause certain features of this website to not function properly or optimally. Check your browser's "Help" files or other similar resources to learn more about handling cookies on your browser. In addition, visit --> <http://www.allaboutcookies.org/manage-cookies/>

Managing Flash Cookies. Flash cookies, also called local shared objects (LSOs), function similarly to standard cookies except that they are often larger and are downloaded to a computer or mobile device by the Adobe Flash Player. In some cases, these Flash cookies can be managed through browser settings. Adobe also provides a means of controlling Flash cookies on its Flash Player: Setting Manager page.

Network Advertising Initiative (NAI). Some companies that use cookies to collect information about your online activities are members of NAI, which offers a single location to opt out of receiving personalized ads from member companies. To opt out of information collection by NAI member companies, or to obtain information about the technologies they use or their own privacy policies, please visit the NAI consumer opt-out page: --> <http://www.networkadvertising.org/choices/> .

Digital Advertising Alliance (DAA). DAA member advertising associations have developed an industry self-regulatory program to give consumers a better understanding of and greater control over ads that are customized based on their online behavior across different websites. To make choices about interest-based ads from participating third parties, please visit DAA Consumer Opt-Out page --> <http://www.aboutads.info/consumers> .

Opting Out With Ad Choices For Mobile Devices. When using mobile applications you may receive personalized in-application advertisements. Depending on your device, you may be able to reset your mobile device's advertising identifier at any time by accessing the privacy settings on your mobile device. In addition, each operating system (iOS for Apple phones, Android for Android devices and Windows for Microsoft devices) provides its own instructions on

how to prevent the delivery of personalized in-application advertisements. You may review the support materials and/or the privacy settings for the respective operating systems in order to opt-out of these advertisements. For any other devices and/or operating systems, please visit the privacy settings for the applicable device or contact (or review the applicable privacy web page of) the applicable platform operator.

ANALYTICS

We may participate with third party analytics partners to monitor and analyze Web traffic and to keep track of user behavior on this site.

Google Analytics (Google) - Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the data collected to track and examine the use of this site, to prepare reports on its activities, and to share them with other Google services. Information collected: cookie and Usage Data. You may opt-out of the Google Analytics service with the Google's Browser Add-on that's available at --> <https://tools.google.com/dlpage/gaoptout> .

DO NOT TRACK REQUESTS

Some Web browsers incorporate a "Do Not Track" feature that signals to websites that you visit that you do not want to have your online activity tracked. Each browser communicates "Do Not Track" signals to websites differently, making it unworkable to honor each and every request correctly. In order to alleviate any communication error between browsers and website, we do not respond to "Do Not Track" signals at this time. As the technology and communication between browser and website improves, we will reevaluate the ability to honor "Do Not Track" signals and may make changes to our policy.

DATA SECURITY

We will implement reasonable and appropriate security procedures consistent with prevailing industry standards to protect data from unauthorized access by physical and electronic intrusion. Unfortunately, no data transmission over the Internet or method of data storage can be guaranteed 100% secure. Therefore, while we strive to protect your Personal Information by following generally accepted industry standards, we cannot ensure or warrant the absolute security of any information you transmit to us or archive at this site.

When you transmit Personal Information through our registration process or if you purchase products or services, we encrypt that information in transit using secure socket layer technology (SSL).

ONWARD TRANSFER OUTSIDE YOUR COUNTRY OF RESIDENCE

Any Personal Information which we may collect on this site will be stored and processed in our

servers located only in the United States. By using this site, if you reside outside the United States, you consent to the transfer of Personal Information outside your country of residence to the United States.

UPDATING PERSONAL INFORMATION

Upon request, we will permit you to request or make changes or updates to your Personal Information for legitimate purposes. We request identification prior to approving such requests. We reserve the right to decline any requests that are unreasonably repetitive or systematic, require unreasonable time or effort of our technical or administrative personnel, or undermine the privacy rights of others. We reserve the right to permit you to access your Personal Information in any account you establish with this site for purposes of making your own changes or updates, and in such case, instructions for making such changes or updates will be provided where necessary.

LINKS TO JOINT VENTURE MARKETING PARTNER SITES

This site may contain links to other websites operated by our joint venture marketing partners. If you do click on any of the links to their websites or accept any of their promotional offers, your click-through information and any information that you provide in the process of registration or purchase will be transferred to these sites. We have no responsibility or liability for the policies and practices of these sites. You should be careful to review any privacy policies posted on any of these sites before providing information to them.

CHILDREN'S ONLINE POLICY

We are committed to preserving online privacy for all of its website visitors, including children. This site is a general audience site. Consistent with the Children's Online Privacy Protection Act (COPPA), we will not knowingly collect any information from, or sell to, children under the age of 13. If you are a parent or guardian who has discovered that your child under the age of 13 has submitted his or her personally identifiable information without your permission or consent, we will remove the information from our active list, at your request. To request the removal of your child's information, please contact our site as provided below under "Contact Us", and be sure to include in your message the same login information that your child submitted.

CONTACT US

If you have any questions regarding this Privacy Policy, please contact the owner and operator of this website business at:

CJA Corporation DBA Vanguard Key Clubs
Attn: Privacy Officer
200 Kensington Rd,

Hampton Falls, NH, 03844
Email: craig-at-vanguardkeyclubs.com
Telephone: 603.758.1320

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Material Modifications Since January 31, 2020: none.