

PRIVACY POLICY



I. ACCEPTANCE OF TERMS

This Privacy Policy describes inCruises® policies and procedures on the collection, use and disclosure of your information. INGROUP INTERNATIONAL LLC d/b/a INCRUISES INTERNATIONAL LLC, or for Puerto Rico residents INCRUISES PUERTO RICO LLC, hereinafter referred to as **"we"**, **"us"**, inCruises, **"inCruises"** or the **"Company"** receives your information through our various web sites, SMS, APIs, services and third parties (hereinafter referred to as the **"Services"**). When using any of our Services you consent to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy. Irrespective of which country that you reside in or create information from, your information may be used by inCruises in the United States or any other country where inCruises operates. This Privacy Policy is incorporated into and subject to the terms of the inCruises Terms of Service. Each time you use the Services, you signify that you have read, understood and agree to be bound by the Terms of Service. If you do not agree to the terms of this Privacy Policy, you must discontinue using the Services and terminate your Membership or Partnership account.

II. INFORMATION COLLECTION AND USE

Visitors of the website may view various web pages without providing any personal information. If you desire to have inCruises provide services or goods to you or an organization of which you have representative capacity, inCruises may ask you to provide certain information about yourself or your organization by filling out and submitting one or more forms. Providing personal information is optional, but inCruises reserves the right to refuse service to you if you are unable or unwilling to provide certain requested personal information as determined by inCruises.

The personal information that you provide in connection with the use of the website or the products and/or services provided by inCruises is protected in numerous ways. Access to your personal information collected during the purchasing of a product or service is available through a password and unique user ID. The password is encrypted. inCruises recommends that you do not divulge your password to anyone. In addition, your personal information resides on secure servers that only selected personnel and contractors have access to via password. inCruises encrypts your personal information as it is transferred to the Company and thereby strives to prevent unauthorized parties from viewing such information.

inCruises collects your information in order to record, support and facilitate your use of the website and to prevent fraud and unlawful use. If you purchase or register for products and/or services, the personal information may be used to register your rights, if any, to technical support or other benefits that may be made available to users. Your personal information may also be used to track your preferences in order to provide an experience customized to your tastes, or to contact you in regards to changes to the site that may affect your account or to update you as to new or updated features. inCruises does not share personal information it receives from residents of California or from residents of any other place with such other organizations for marketing purposes unless we have received an opt-in from you. If you were referred to our services by an Independent Partner, your contact information (name, address, email address, and/or telephone number) will be shared with the Independent Partner who referred you.

III. INFORMATION COLLECTED UPON REGISTRATION

When you create or reconfigure an inCruises account, you provide some personal information, such as your name, username, password, and email address. Some of this information, for example, your name and username may be listed publicly on our Services. Without your permission, we will not share, rent or sell any of this registration information to any third party in any other way than is (i) disclosed by this privacy policy or (ii) required by applicable law, regulation or court order.

IV. ADDITIONAL INFORMATION

You may provide us with additional information to make public, such as a short biography, your location, or a picture. You may customize your account with information such as a cell phone number. Without your permission, we will not share, rent or sell any of this registration information to any third party in any other way than is (i) disclosed by this privacy policy or (ii) required by applicable law, regulation or court order.

V. LOG DATA

In order to reduce errors in our database(s), authenticate our users, prevent fraud and prevent abuse of inCruises' web site and/or the product and services inCruises provides, as well as to provide more consistent, relevant experiences to inCruises' users, inCruises may on occasion supplement or correct the personal information you submit to inCruises and your Internet Protocol (IP) address with information in our other databases or information from third-party sources. As permissible, inCruises may also supplement the personal information you provide to inCruises with demographic and other information stored in third-party databases in order to make it more likely that communications inCruises may send will be of interest to you.

VI. LINKS

inCruises may keep track of how you interact with links in posts and emails by redirecting clicks or through other means. We do this to help improve our Services, including advertising, and to be able to share aggregate click statistics such as how many times a particular link was clicked on.

Our services may contain links to other sites. Please be aware that inCruises is not responsible for the privacy practices of such other sites. We encourage users to be aware when they leave our site and to read the privacy statements of each and every website that collects Personal Information. This privacy statement applies solely to information collected by inCruises websites.



VII. COOKIES

Like many websites, we use **"cookie"** technology to collect additional website usage data and to improve our Services, but we do not require cookies for many parts of our Services such as searching and looking at public user profiles or lists. A cookie is a small data file that is transferred to your computer's hard disk. inCruises may use both session cookies and persistent cookies to better understand how you interact with our Services, to monitor aggregate usage by our users and web traffic routing on our Services, and to improve our Services. Most Internet browsers automatically accept cookies. You can instruct your browser, by editing its options, to stop accepting cookies or to prompt you before accepting a cookie from the websites you visit.

VIII. THIRD PARTY SERVICES

inCruises uses a variety of services hosted by third parties to help provide our Services and to help us understand the use of our Services. These services may collect information sent by your browser as part of a web page request, such as cookies or your IP request.

IX. INFORMATION SHARING AND DISCLOSURE

inCruises recognizes and appreciates the importance of responsible use of information collected on the website and in connection with the products and services provided by inCruises. inCruises will respect your legal rights regarding access to, and correction and deletion of, your personal information. inCruises may communicate information to you regarding products, services, and special offers available from inCruises unless you have opted not to receive such communications or such communications are prohibited by law, although in such cases inCruises may find it necessary to continue to communicate with you regarding your use of the website and the products and services. In addition, you may receive communications and special offers from selected third party providers, but only if you previously opted in to receive such communications. inCruises will not provide your name to other companies or organizations without your consent. If you have opted to receive email communications from our selected third party providers and later wish to discontinue receipt of these emails, please contact those third parties directly to update your preferences.

X. SERVICE PROVIDERS

We engage certain trusted third parties to perform functions and provide services to us. We may share your personal information with these third parties, but only to the extent necessary to perform these functions and provide such services, and only pursuant to obligations mirroring the protections of this privacy policy. We may provide products and/or services that may require you to accept one or more privacy policies of third party providers. It is your duty to familiarize yourself with the privacy policies of the third party providers. If you do not accept the privacy policy of the third party providers, inCruises reserves the right to refuse services to you.

XI. INDEPENDENT PARTNER PROGRAM

If you sign up under the inCruises Independent Partner Program, you will be required to read and agree to the terms of the inCruises Independent Partner Program Agreement before being allowed to receive compensation for referring anyone to the Site. Please read the terms carefully before agreeing to participate in the Independent Partner Program. We will use the email address that you provide to us to contact you regarding the enrollment in the Independent Partner Program, and we will use the address that you provide to us to send you any payments owed to you under the terms of the Independent Partner Program or any other system available to us that will facilitate the transfer of these funds. If you were referred to the Independent Partner Program by another Independent Partner, your contact information (name, address, email address, and/or telephone number) will be shared with the Independent Partner who referred you.

XII. ONLINE SURVEYS AND CONTESTS

inCruises may conduct, on occasion, a survey to collect information about your preferences and the preferences of other users. These surveys are optional and your responses will be kept anonymous.

inCruises may also offer contests to qualifying users. In order to participate, we may ask for your contact and demographic information such as your name, your email address and your mailing address. Except as otherwise provided for in this Privacy Policy, none of the information you provide in relation to a contest is shared with third parties, except in summary form, if at all. The demographic information that inCruises collects in the registration process and through surveys and contests is utilized to help us improve our Services. This may include targeting advertising to you about our Services. Information we gather through a contest may also be disclosed to third parties as necessary for prize fulfillment and for other aspects of any contest or similar offering.

XIII. THE INCRUISES PAYMENT SYSTEM

The inCruises Payment Service allows a user to pay with a credit card, wire transfer, ACH, debit card or check. inCruises will collect your payment information and/or other entered financial institution information such as bank account numbers and will use that information to bill you for membership fees and/or to perform a payment on behalf of a third party provider. inCruises may use and disclose such payment information and/or other entered financial institution information to third parties as necessary to complete such billing operation.

Please see our [Payment Agreement](#) for more information on payments.

XIV. EMAIL TO FRIENDS FEATURE

inCruises lets you send invitations to join the Site to friends, family and other personal connections (hereinafter referred to as "**Friends**") via email and social media posts. inCruises also offers the ability to send Friends emails about the Services provided by inCruises. If you choose to use these features, you may be assured that inCruises will only use your Friends' email addresses to notify them of the Services and Business Opportunities available on the Site. inCruises will not share your Friend's emails and information with any third party providers or advertisers in any way; except **(i)** for the purposes of sending the invitations to join our site if you choose to use this feature **(ii)** as otherwise may be provided for in this agreement.

XV. LAW AND HARM

We may disclose your information if we believe that it is reasonably necessary to comply with a law, regulation or legal request; to protect the safety of any person; to address fraud, security or technical issues; or to protect inCruises' rights or property.

XVI. BUSINESS TRANSFERS

In the event that inCruises is involved in a bankruptcy, merger, acquisition, reorganization or sale of assets, your information may be sold or transferred as part of that transaction. The promises in this privacy policy will apply to your information as transferred to the new entity.

XVII. NON-PRIVATE OR NON-PERSONAL INFORMATION

The Company may collect information about the use of the web site and the third party software packages listed therein, such as the number of downloads, services purchased/utilized, how many users visit the website daily, web pages visited, and the IP address of your computer. This information is generally collected in aggregate form, without identifying any user individually, although IP address and Session ID in relation to purchases may be tracked as part of the Company's customer order review and fraud prevention efforts.

The Company may use aggregate, non-identifying statistical data for improving the website and the products and services provided by the Company.

XVIII. MODIFYING YOUR PERSONAL INFORMATION

If you are a registered user of our Services, we provide you with tools to access or modify some of the personal information you provided to us and associated with your account.

Certain personal information not accessible online by you (e.g., IP address) that you provide is accessible only by selected personnel and contractors via password and is not modifiable by you.

XIX. OUR POLICY TOWARDS CHILDREN

Our Services are not directed to people under 18. If you become aware that your child has provided us with personal information without your consent, please contact us. We do not knowingly collect personal information from children under 18. If we become aware that a child under 18 has provided us with personal information, we take steps to remove such information and terminate the child's account.

XX. CHANGES TO OUR PRIVACY POLICY

From time to time inCruises may update this Privacy Policy when our information practices are modified or changed. If we make any material changes to this policy, we will announce that this policy has been changed at our website home page for a period of 30 days. Your continued use of the Services after we post a revised Privacy Policy signifies your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes in the revised Privacy Policy. If you object to any such changes, you must cease using the Services. We therefore encourage you to periodically review this page for the latest information on our privacy practices.

XXI. QUESTIONS

Questions regarding this Privacy Policy should be directed via an online support ticket at incruises.com/support.

XXII. EFFECTIVE DATE

The effective date of this Privacy Policy is September 1st, 2015.