

PRIVACY NOTICE

Introduction. You purchased a Time-Share from **Vacation Sales Associates, L.L.C.**, a Virginia limited liability company ("Developer") at the above mentioned Time-Share Project. In acquiring this Time-Share, you may have financed a portion of the purchase price. In order to do this, information about you was obtained. Moreover, as a result of ownership of the Time-Share, you automatically became a member of the Time-Share Association. You also became eligible for membership in an internationally recognized exchange company and may have inured to other benefits, for example, reduced user fees at local facilities, access to travel reservations, last minute vacation offerings, etc. These events and circumstances result in your having a customer or consumer relationship with Developer in one way or another which requires that a Privacy Notice be provided to you when the relationship is established.

Your Privacy is Important to Us. Protecting your privacy is very important to us. We value your trust and want you to understand what information we collect, how we protect it, and how we use it. We treat personal information - nonpublic information that identifies you - with respect and in accordance with this Privacy Notice.

We are committed to protecting your privacy and earning your trust. We respect your right to keep your personal information confidential and to avoid unwanted solicitations.

Please read this Notice to learn how we will handle your personal information, and the information of others with which we have an established business relationship.

As a part of this Notice, you will find a list of Developer affiliations and related companies which compose the "Developer's Corporate Family". This Privacy Notice applies to each member of the Developer's Corporate Family.

Consumer Privacy Notice

Our Consumer Privacy Notice tells you the kind of information we collect about you, with whom we share it, and how we protect it responsibly. The Notice applies to an individual who obtains or has obtained a financial product or service from a financial institution that is to be used primarily for personal, family, or household purposes (i.e. a "consumer") or to such individual consumer who has a continuing relationship with us (i.e. a "customer"). The examples that you will find throughout this Notice are for purposes of illustration only and should not be considered a complete description of our information practices.

Categories of Information We May Collect and Disclose

We collect information about people and property as described below. Some of this is called "**Nonpublic Personal Information**," which generally means information that is provided by you, obtained by us, or that results from your transactions with us. It does not include information available to the general public. We collect this information from the following sources:

Application Information: This is information we receive from you on applications, personal financial statements, direct mail, telemarketing, cold calling, "box programs", and other oral, written, or electronic communications, including, for example your name, address, telephone number and e-mail address, social security number, driver's license number, date of birth, length of employment, marital status, gender, compensation, home ownership, length of residency, and credit card information;

- **Transaction Information:** This is information about your transactions with us, other affiliate companies in the Developer's Corporate Family or others. It includes your payment history, information necessary for billing and payment, purchase information, and information used to investigate your creditworthiness and prior loan history. **Transaction Information** may be disclosed as described below;
- **Consumer Report Information:** This is information we receive from a consumer reporting agency and is used to confirm or supplement Application Information. It includes credit report information, prior loan history, mortgage payment history, and information used to confirm the veracity of Application Information. We will disclose **Consumer Report Information** only as necessary to satisfy us that you meet the eligibility requirements for ownership of the Time-Share, your creditworthiness should you have financed its purchase, other matters relative to membership in the Exchange Company and the Time-Share Association, your on-going participation in the Time-Share Program, and as permitted or required by law. **Consumer Report Information** may be shared among our affiliated companies. By requesting and/or obtaining Time-Share ownership, financing and membership afore described, and participation in such Program, you consent to our sharing of this information among affiliated companies within Developer's Corporate Family; and
- **Web Site Information:** This is information we receive from your computer when you visit our Web site, including the Web site you visited before ours, your Internet e-mail address and operating system, and statistical information on Web traffic and usage patterns. We also store "cookies" on your computer to save information entered during your prior visits to our Web site. We collect technical data, such as your Internet protocol (IP) address, operating system, and session ID. We will not disclose personally identifiable **Web Site Information** without your consent.

Disclosure of Information To Third Parties

Nonpublic Personal Information about you and our former customers may be disclosed to others as permitted by law. Generally, this includes disclosures to third parties that are necessary to effect, administer or enforce your transaction with us, or in connection with servicing our ongoing customer relations. These parties may include our group of affiliated companies, or their employees, agents or representatives, and courts and governmental agencies, and third parties (including, for example, service companies, travel agencies, travel certification companies and premium companies). We may also disclose this information to the following types of third parties (these are typically companies that have referred you to us or that have a relationship with you), but you will have the opportunity to opt out of such disclosures before they are made:

1. Non-affiliated financial service providers, such as banks, credit card companies, and insurance companies; and
 2. Non-financial companies, such as clubs, associations of which you may be a member, product related service companies, insurance companies, and other companies which may have an interest in your **Nonpublic Personal Information**.
- We may also disclose **Application Information** and **Transaction Information** about you and our former customers to companies that perform marketing services on our behalf or to financial institutions with whom we have joint marketing agreements.

We are required to, or we may, provide information about you to third parties other than Developer or related and affiliated entities within Developer's Corporate Family without your consent, as permitted by law. For example:

- i. To respond to a subpoena or court order, judicial process or regulatory authorities;
- ii. To consumer reporting agencies;
- iii. In connection with a proposed or actual sale, merger, or transfer of all or a portion of a business or operating unit;
- iv. To protect against fraud, and insure confidentiality and security;
- v. To assist or be part of a proposed or actual securitization, secondary market sale (including sales of loan servicing rights), a loan hypothecation, or similar transaction related to a transaction of the consumer.

In addition, we may generally disclose information to third parties that is necessary to effect, administer or enforce your transaction with us, in connection with servicing our on-going customer relations, or one you request or authorize. These parties may include a group of affiliated companies, or their employees, agents or representatives, and courts and governmental agencies and outside lending or financial institutions. Our service providers may include billing service providers, mail and telephone service companies, insurers, loan settlement service providers, property inspection and/or management companies, attorneys or other professionals.

If you close your accounts or your relationship becomes inactive, we will continue to treat the information we have collected about you in accordance with this Notice.

Confidentiality and Security

We restrict access to Nonpublic Personal Information about you to those employees and other parties who must use that information to provide products or services to you. Their right to further disclose and use the information is limited by our employee code of conduct, applicable law, and non-disclosure agreements where appropriate. We also maintain physical, electronic, and procedural safeguards in compliance with applicable laws and regulations to guard your Nonpublic Personal Information.

Our employees are bound by the Codes of Ethics of both the American Resort Development Association (ARDA) and the Virginia Resort Development Association (VRDA) and policies to access consumer information only for legitimate business purposes and to keep information about you confidential.

Developer's Corporate Family

This Notice is provided on behalf of the following Developer companies within Developer's Corporate Family:

Vacation Sales Associates, L.P.	Ocean Sands Resort, L.L.C.	Ocean Key Associates, L.L.C.	Ocean Key Management Corporation
Ocean Key Owners Association	The Atrium Owners Association	Ocean Sands Owners Association	Vacation Sales, Inc.
Atrium Corporation	VSA Management Corporation	Ocean Sands Manager, Inc.	Vacation Sales Associates, L.L.C.
FFB, LLC			

How to Tell us Not to Share This Information; Opt Out Rights

If you do not want your Nonpublic Personal Information disclosed to non-affiliated third parties, you may "opt out" of those disclosures, meaning that you may tell us not to make those disclosures (other than disclosures that are permitted by law even if you opt out). If you opt out, we will not disclose this information to non-affiliated third parties to independently market products or services to you, but we may include their offers in billing statements and other routine communications that we send to you in connection with servicing your business relationship with us.

Note: Your opt out only covers Application Information and credit-related information obtained from you and others that we might otherwise share within our Corporate Family. We may continue to share other information about you within Developer's Corporate Family as permitted by law, such as information about your transactions with us and certain identifying information, including name, address, telephone number, and social security number. Each company within Developer's Corporate Family will continue to contact its consumer clients with offers of its own products and services. You will continue to receive product messages via your statement(s), as well as telephone and mail offers from Developer companies with whom you have relationships.

Capitalized or block terms used in this Privacy Notice shall have those meanings given to them in the Time-Share Instrument and the Statutes.

To opt out, simply detach and mail the form at the bottom if this page to the address listed. An opt out election by you or any other who maintains a relationship with Developer will be effective for all persons that your relationship relates to. **If you previously opted out, there is no need to do so again.**

(DETACH HERE)

Customer Opt Out Form

I wish to exercise my opt out rights described in Vacation Sales Associates, L.L.C.'s Privacy Policy.

Name: _____

Address: _____

City _____ State _____ Zip _____

Resort: _____ Unit: _____ Week: _____ Account # _____

Date: _____

Mail to:

Vacation Sales Associates, L.L.C.
2696 Reliance Drive, Suite 300
Virginia Beach, VA 23452

Signature: _____