

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 the process of purchasing and/or financing your Time-Share, information about you was obtained. As a result of ownership of the Time-Share, you automatically became a member of the Time-Share Association. You may also be eligible for membership in an internationally recognized exchange company and may become eligible for other benefits and financial incentives, including but are not limited to reduced user fees at local facilities, access to travel reservations, last minute vacation offerings, deals, discounts and coupons on vacation offerings and other financial incentives. These events and circumstances result in your having a customer or consumer relationship with us 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 applicable laws and 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/or Disclose

We collect, and have collected, information about people, consumers, customers and property as described in this Privacy Notice and as permitted by applicable law. Some of this information is called “**Nonpublic Personal Information**” or “**Personal Information**” which is information that may identify, relate to, describe, reasonably be capable of being associated with, or could reasonably be linked, directly or indirectly, with you or a particular consumer or household. Generally, Personal Information does not include publicly available information and, under some applicable law, does not include information that is deidentified or aggregate consumer information. We generally obtain Personal Information directly from you or from other entities, companies or individuals about you, and we also have access to Personal Information as a result of, or that is derived from, your transactions with us. The categories of personal information that we have collected about you and other consumers, and the categories of sources from which we have collected such personal information, and the business or commercial purpose for which we have collected such personal information, include:

- **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 but not limited to your name, alias, 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, professional or employment-related information, education information and credit card information. We may use and/or disclose this information to assess eligibility requirements for ownership of the Time-Share, creditworthiness, and membership and participation requirements in the Time-Share Association and Time-Share Program. We may also disclose this information to companies that perform marketing services on our behalf or to financial institutions with whom we have joint marketing agreements.
- **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 used, disclosed and/or sold as described below.
- **Consumer Report Information:** This is information we receive from consumer reporting agencies and is used and disclosed 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 may use and/or disclose Consumer Report Information only as necessary to (a) satisfy us that you meet the eligibility requirements for ownership of the Time-Share, (b) assess your creditworthiness if you have financed its purchase, (c) evaluate other matters relative to your membership in the Exchange Company and/or the Time-Share Association and/or your on-going participation in the Time-Share Program, and (d) evaluate other factors as permitted or required by law. Consumer Report Information may also be shared among our affiliated companies.
- **Web Site Information:** This is information we receive from your computer when you visit our Web site, and may include internet

or other electronic network activity information, browsing history, search history, information regarding your interaction with internet websites, applications and advertisements, your Internet e-mail address and operating system, statistical information on Web traffic and usage patterns, online identifiers, internet protocol addresses, email addresses, account names and session identification names and numbers. We also store “cookies” on your computer to save information entered during your prior visits to our Web site. We may use and/or disclose this information to aggregate data on visitors to our website, maintain the security of our website, evaluate matters relative to your on-going participation in the Time-Share Program and other factors permitted or required by law.

- **Additional Personal Information.** Addition Personal Information may include inferences drawn from any of the information drawn above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

In the preceding twelve (12) months, we have collected, and we have disclosed for a business purpose, the following categories of personal information about consumers: Application Information, Transaction Information, Consumer Report Information and Web Site Information (as those terms are used above).

Disclosure of Information To Third Parties

Nonpublic Personal Information about you and our former customers may be disclosed to others as permitted by law. This includes disclosures to third parties that are necessary to evaluate, effect, administer and/or enforce your transaction with us, or in connection with servicing our ongoing customer relations. The categories of third parties with whom we share personal information may include:

1. Our group of affiliated companies and their employees, agents and representatives, including the entities in the Developer’s Corporate Family;
2. Courts and governmental agencies;
3. Financial service providers, including banks, credit card companies, insurance companies and other financial institutions;
4. Our service providers who 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; and
5. Non-financial companies, including clubs, associations of which you may be a member, product related service companies, insurance companies service companies, travel agencies, travel certification companies, marketing agencies, premium companies, and other companies which may have an interest in your Nonpublic Personal Information.

Some of these third parties are companies that referred you to us or have existing relationships with you.

The reasons for which we may provide information about you to these third parties include, but are not limited to:

1. To respond to a subpoena or court order, judicial process or regulatory authorities;
2. To provide requested information to consumer reporting agencies;
3. In connection with a proposed or actual sale, merger, or transfer of all or a portion of a business or operating unit;
4. To protect against fraud, and insure confidentiality and security;
5. 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; and
6. To, in general, effect, administer or enforce your transaction with us, in connection with servicing our on-going customer relations, or one you request or authorize.

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.

We do not currently sell any personal information to third parties, have not sold consumers’ personal information in the last twelve (12) months, and have not sold consumers’ personal information for any business purpose. In the event that we do sell personal information to third parties, you have the right to request that we do not sell your personal information.

As a matter of policy, (a) all consumers must be at least eighteen years of age or older and (b) we do not collect information from individuals under the age of eighteen. In accordance with the event that we collect information from an individual under the age of eighteen, we will not sell such personal information if we have actual knowledge that the consumer is under the age of sixteen unless (A) for consumers ages thirteen through fifteen, the consumer has affirmatively authorized the sale of his or her personal information or (B) for consumer’s under the age of thirteen, the consumer’s guardian has affirmatively authorized the sale of the minor’s personal information.

Administrative Information

We will not discriminate against you because you exercised any of your rights under applicable law. But, we are not prohibited under the California Consumer Privacy Act of 2018 from charging you a different price or rate, or from providing a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to the you by your data.

As listed above in the first paragraph of this Privacy Notice, we may offer, and you may become eligible for, financial incentives as a result of your purchase. We may offer financial incentives (examples of which are listed in the first paragraph of this Privacy Notice) for the collection or deletion of personal information. We may enter you into a financial incentive program only if you give us prior opt-in consent

that clearly described the terms of the financial incentive program and which may be revoked by you at any time. We will not use financial incentive practices that are unjust, unreasonable, coercive or usurious in nature.

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 the American Resort Development Association (ARDA) and policies to access consumer information only for legitimate business purposes and to keep information about you confidential.

Notwithstanding the above information, we also may disclose personal information in accordance with the terms of this Privacy Policy and applicable law.

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 Key Associates, L.L.C.
Ocean Key Owners Association
Ocean Sands Owners Association
Atrium Corporation
Ocean Sands Manager, Inc.
FFB, LLC
OSKAR, LLC
Vacanza, LLC
Atrium Condo Association
Roland Court LLC

Ocean Sands Resorts, L.L.C.
Ocean Key Management Corporation
The Atrium Owners Association
Vacation Sales, Inc.
Ocean Sands Owner, L.L.C.
Vacation Sales Associates, L.L.C.
VSA Management Corporation
VSA Association Management, LLC
Ocean Water, LLC
VSA Hotel Management, LLC

How to Tell Us Not to Share This Information or to Delete This Information; Opt Out Rights; Rights of Inquiry

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 tell us not to make those disclosures (other than disclosures that are permitted by law even if you opt out). If you opt out and direct us not to disclose the information, 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: Unless otherwise noted in this Privacy Policy, your opt out only covers Application Information and credit-related information obtained from you and others. 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 companies within Developer's Corporate Family with whom you have relationships.

Right to Request that We Delete Personal Information Collected

To the extent applicable, the California Consumer Privacy Act of 2018 may also provide you with the right to request that we delete any personal information about you that we have collected from you. If you want your personal information deleted in accordance with the California Consumer Privacy Act of 2018, we must receive a verifiable consumer request from you to delete your personal information. When we receive such a verifiable consumer request to delete your personal information, we will delete your personal information from our records and direct any service providers to delete your personal information from their records.

Even if we receive a verifiable consumer request from you to delete your personal information, we are not required under the California Consumer Privacy Act of 2018 to comply with your request to delete your personal information if it is necessary for us or our service provider to maintain your personal information in order to: (1) complete the transaction for which the personal information was collected, provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you; (2) detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for such activity; (3) debug to identify and repair errors that impair existing intended functionality; (4) exercise free speech, ensure the right of another consumer to exercise its right of free speech or exercise any other right provided by law; (5) comply with any applicable law, statute, act or governing rule; (6) engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when deletion of the information is likely to render impossible

or seriously impair the achievement of such research, if you have provided informed consent; (7) enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; (8) comply with a legal obligation; or (9) otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Right to Request that We Disclose the Following Information.

To the extent applicable, the California Consumer Privacy Act of 2018 may also provide you with the right to request that we disclose to you the following: (1) categories of personal information we have collected about you; (2) categories of sources from which the personal information is collected; (3) business or commercial purpose for collecting or selling personal information; (4) categories of third parties with whom we share personal information; (5) specific pieces of personal information we have collected that you; and (6) categories of personal information that we disclosed about you for a business purpose. We are required to this information to you on receipt of a verifiable consumer request from you.

To the extent applicable, the California Consumer Privacy Act of 2018 may also provide you with the right to request that we disclose to you the specific pieces of personal information that we have collected about you and from you. Under the California Consumer Privacy Act of 2018, we are obligated to provide this information to you only on receipt of a verifiable consumer request. If we receive a verifiable consumer request from you to access your personal information, we are required to promptly take steps to disclose and deliver, free of charge to you, the personal information requested in this regard. We may deliver the information by mail or electronically and if we provide it electronically, the information will be in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the information to another entity without hindrance. We are not required to provide personal information to you more than two times in a twelve-month period.

You may submit requests to us through our website, www.vsaresorts.com, or calling us on our toll-free number, 1-800-955-9700. Once we have verified the request, we will proceed in accordance with this Privacy Policy and applicable law.

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

Each of the undersigned hereby acknowledge receipt of this Privacy Notice when the customer relationship began. Moreover, each has read and understood the contents of this Privacy Notice and after a review of same and satisfactory answers given to all questions asked, make the following opt-out decision:

(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.
2829 Guardian Lane, Suite #220
Virginia Beach, VA 23452

Signature: _____