

PRIVACY NOTICE (OYCT)

The corporation Operadora y Comercializadora Turística, S.A. de C.V., addressed at Boulevard Nuevo Vallarta S/N, suite 100, in Fraccionamiento Nuevo Vallarta, municipality of Bahía de Banderas, Nayarit, Mexico, 63732, telephone 01-800-774-6148, website www.marivalvacationclub.com.mx, is responsible for the use and protection of your personal data and pursuant to this fact we hereby inform you the following:

For what purposes will we use your personal data?

- THE PERSONAL DATA WE COLLECT FROM YOU WILL BE USED FOR THE FOLLOWING PRIMARY PURPOSES:
- FOR PROMOTING, PUBLISHING, MARKETING AND OTHER SERVICES RENDERED WITH THE PURPOSE OF SELLING THE TIMESHARE VACATION MEMBERSHIPS.
- IN GENERAL PROCESSING AND MANAGING YOUR LODGING RESERVATIONS, AS WELL AS HIRING OTHER COMPLIMENTARY SERVICES OF YOUR STAY WHICH FROM TIME TO TIME YOU MAY HIRE THRU US.
- PROCESS YOUR AFFILIATION TO THE EXCHANGE COMPANY OR COMPANIES THAT YOU CHOOSE AT THE MOMENT OF ACQUIRING YOUR MEMBERSHIP OR AFTER SUCH PURCHASE.
- TO PROMOTE THE PROGRAMS KNOWN AS “FLY & BUY” TO QUALIFIED AND NON QUALIFIED COUPLES AIMING TO PROMOTE THE COMMERCIALIZATION OF TIMESHARE VACATION MEMBERSHIPS.
- ANY OTHER KIND OF TREATMENT OF INFORMATION ARISING FROM YOUR CHARACTER OF PROVIDER, VISITOR OR USER OF OUR WEBSITES, SUCH AS INVOICING, PROCESSING ORDERS AND INTEGRATING OUR ADMINISTRATIVE FILES AS DOCUMENTAL OR ANY OTHER KIND OF SUPPORT ABOUT THE EXISTING COMMERCIAL RELATION WITH YOU.

Additionally, we will use your personal information for the following secondary purposes that are not necessary to provide the services required, but that allow us and facilitate a better service:

- Marketing and advertisement.
- Commercial prospection.
- Quality Control
- Consumption Behavior Definition
- Make feedback and data update campaigns

In case that you do not wish your personal information is used for these secondary purposes, we ask that you let us know at this moment to our staff or send an e-mail message to the address privacidad@marivalgroup.com or using the option that may apply:

- In case you directly provide your personal information, in that moment inform our collaborator and request the corresponding form to document your denial.
- In case you provide your personal information using our website or any mobile application, you must send an e-mail to the following address: privacidad@marivalgroup.com

Your denial of authorization for use of your personal information for these purposes shall not be a reason for denial of services and products requested or hired with us.

What personal information will be used for these purposes?

- a) Identification data: Name, Last name, signature, identification document with photograph, Unique Code for Registration of Population (CURP).
- b) General data: Full Address, either home address or work, personal or work e-mail; personal or work telephone number; Cellular Phone number, Nextel ID number (in its case) and Fax number; Date of Birth; age, marital status and nationality.
- c) Tax information: Code from the Federal Taxpayer’s Register (RFC), as well as your fiscal address and tax regime (in its case).
- d) Data related to bank accounts, credit cards and/or debit cards, name of the cardholder, account number and Banking Institution, CLABE (in its case), card number; expiration date of the card, type of card and security code. All these data will be saved only with your express consent and in case you inform us your opposition we might be prevented to provide you our services since it might not be possible to process the corresponding payment.
- e) Patrimonial information: Statistic information about your income and expenses rank, time share memberships you previously acquired by you and other data that can allow us to know your purchasing power.
- f) Sensitive Personal Data: Operadora y Comercializadora Turística, S.A. de C.V., does not collect or treats sensitive personal data.
- g) Personal Data from sources of public access and received via consented transfers: resulting from public registers, directories, social networks and other lawful sources available in the market, as well as personal data shared by third parties you previously authorized.

I hereby authorize the transfer of my personal information.

Yes _____ No _____

Holder name and signature

Holder name and signature

Latest update: 10- JAN-2017

DISCLAIMER.- This is a courtesy English translation. Should any conflict or controversy result between the Spanish and the English version, the Spanish version shall prevail.

h) Personal data obtained from social networks: Operadora y Comercializadora Turística, S.A. de C.V., will be able to collect and process personal data and information you shared in the social network (such as Facebook®, Instagram®, Pinterest®, Foursquare®, Google® and Twitter®, among others), particularly the information you shared in the profile of its affiliate companies which are mentioned below.

i) Personal data from Travel Agencies: Operadora y Comercializadora Turística, S.A. de C.V., might receive your personal data when you make your lodging reservation thru a minor or major travel agency located in the country or abroad, such as RCI, HIS and Owner’s Link.

The personal data described in the previous paragraphs of this section, are collected thru: i) the use of formats or printed documents; ii) the use of emails and/or iii) the voluntary provision of information and personal data when you request to stay on the facilities of one of the companies to which Operadora y Comercializadora Turística, S.A. de C.V., renders its services, when you communicate via telephone with us or our employees (including the customer services area); iv) thru the web sites of the hotels that are part of the corporate group commercially known as Marival Group; v) using public access sources and other sources available in the market; vii) phone calls made by our agents, and viii) the social media from the hotels that are part of the corporate group commercially known as Marival Vacation Group.

The personal data collected by Operadora y Comercializadora Turística, S.A. de C.V., are protected thru adequate security, administrative and physical measures against damages, loss, alteration, destruction, use, access and unauthorized treatment, in accordance to the LFPDPPP and its regulations. To know more about our security measures please contact privacidad@marivalgroup.com.

With whom shall we share your personal information and for what purposes?

- a) We hereby inform you that your personal information is shared within and outside of the country in case is necessary to accomplish the purposes set forth herein.
- b) We also inform you that Operadora y Comercializadora Turística, S.A. de C.V., is part of a corporate group commercial known as “MARIVAL GROUP” and it might transfers your personal data to other companies from the same group, as provided in article 37 from the Federal Protection of Personal Data in possession of third parties Act regarding the related parties. The companies that integrate the group are:

- Rinoval de México, S.A. de C.V.,
- Vacation Club Services, S.A. de C.V.,
- Administraciones Profesionales de Vallarta, S.A. de C.V.,
- Fairmont Rancho Banderas, S.A. de C.V.,
- Destiladeras Resort Operations, S.A. de C.V.,
- Constructores y Desarrolladores Inmobiliarios de la Bahía, S.A. de C.V.,
- Comercializadora Access del Puerto, S.A. de C.V.,
- Servientas de México, S.A. de C.V., y
- Servicios Terrestres del Nayar, S.A. de C.V.

Third Party	Country	Purpose	Type
Bank Institutions	México	Processing Payments	Obligatory
Internal Revenue Service	México	Comply with the current tax provisions thru filing the periodical tax declarations.	Obligatory
Federal Consumer Agency	México	Following up of the procedures provided in the Federal Consumer’s Protection Act.	Obligatory
RCI	United States of America and Mexico	Affiliation to your vacation program	Voluntary Authorize: Yes: _____ No: _____
HSI	United States of America and Mexico	Afiliación a su programa vacacional	Voluntary Authorize: Yes: _____ No: _____
Owner´s Link	United States of America and Mexico	Owner’s LinkUnited States of America and Mexico	Voluntary Authorize: Yes: _____ No: _____
Private Third Parties	Mexico or Abroad	Dar financiamiento para el pago del enganche de la membresia	Voluntary Authorize: Yes: _____ No: _____

c) Also we will share your personal information with independent third parties with which we need to interact to accomplish the purposes set forth herein. Said independent third parties especially include banking institutions that process your payments and the exchange companies to which you request us to be affiliated (currently RCI, HSI and Owners-Link). This transfer will always be optional and you will be able to oppose to it in any moment. The third parties with which we will share your personal data are as follows and those transfers could be voluntary or mandatory:

d) Finally, we hereby inform you that we will transfer your data in the events set forth on article 37 the Federal Law of Protection of Personal Information in Possession of Particular Parties which expressly provides the possibility of sharing your information with the competent authorities and controlling companies, affiliates and subsidiary companies under the common control of the responsible, or to a holding company or any company of it.

How may you access, rectify or cancel your personal information or oppose to its use?

You have the right to know what personal information we have obtained from you, the purpose for its use and the conditions of use that you are provided with (Access). Also, it is your right to request the correction of your personal information in the case that it is out of date, inexact or incomplete (Rectification); request its elimination from our records, or databases when it is considered that it is not being used adequately (Cancellation); as well as to oppose the use given to your personal information for specific purposes (Opposition). These rights are known with the acronym ARCO.

For the exercise of any of the ARCO rights, you must file the corresponding form thru the following means: By email sent to the address privacidad@marivalgroup.com or also contact our Personal Data Protection Department in order for it to process your request, give you orientation and provide you the corresponding form. The address from our Personal Data Protection Department is Paseo Cocoteros s/n, hotel Marival Resort & Suites, fraccionamiento Nuevo Vallarta, Municipality of Bahia de Banderas, Nayarit, zip code 63732, phone number 322-226-8200 (line 4493). Regarding the procedure and requirements for exercising your ARCO rights, we hereby inform you the following:

- a) Through what means may the principal's identity be ascertained, and in its case, it's legal representative as well as the authorities of the latter?
ATTACH A COPY OF THE OFFICIAL ID, AS WELL AS THE CONSTITUTIVE ACT (IN RELATION TO LEGAL ENTITIES). WHEN LEGAL ENTITIES OR REPRESENTATIVES OF NATURAL PERSONS, THE REPRESENTATION MUST BE ASCERTAINED BY A PUBLIC INSTRUMENT OR PROXY SIGNED BEFORE TWO WITNESSES, THE DECLARATION IN PERSONAL APPEARANCE OF THE PRINCIPAL.
- b) What information and/or documentation shall the application contain?
THE INFORMATION THAT FACILITATES THE IDENTIFICATION OF THE INFORMATION MATTER OF THE REQUEST (FOR EXAMPLE: MEMBERSHIP NUMBER, DATE OF STAY, RESERVATION NUMBER).
- c) What is the term in which we will respond to your request?
20 DAYS
- d) What means shall we use to communicate our response to your request?
E-MAIL
- e) What means may be used to reproduce personal information, which in its case, may be requested?
IN THE SAME MANNER IN WHICH IT WAS SUPPLIED BY THE CUSTOMER
- f) We have, at your disposal, the following forms or systems to facilitate the exercise of your ARCO rights:
The forms and corresponding systems and orientation about exercising your ARCO rights can be obtained thru our Personal Data Protection Department in the email address privacidad@marivalgroup.com and physically located in Paseo de los Cocoteros s/n, hotel Marival Resort & Suites, fraccionamiento Nuevo Vallarta, Municipality of Bahia de Banderas, Nayarit, zip code 63732, phone number 322-2268200 (line 4493).

- g) Is there a cost for the exercise of my ARCO rights?

The exercise of the ARCO rights is gratuitous. However, you may be required to pay only for the justified expenses of the shipping, or the cost of reproduction in copies or other formats. Likewise, if the same person withdraws their request in a period of less than twelve months, the costs may not exceed three days of the Minimum Wage Enforceable in the Distrito Federal (Federal District), unless that there are substantial modifications to the privacy disclaimer that may motivate new inquiries.

- h) For more information regarding the procedure, the following means of communication are made available:
THE E-MAIL ADDRESS PRIVACIDAD@MARIVALGROUP.COM

The contact information of the person or department of personal information, that shall be in charge of processing the requests related with the ARCO rights, are the following:

- a) Name of the person or department of personal information: DEPARTAMENTO DE DATOS PERSONALES GRUPO MARIVAL.
- b) Address: Paseo de los Cocoteros s/n, interior Marival Resort & Suites, in Fraccionamiento Nuevo Vallarta, municipality of Bahia de Banderas, Nayarit, México 63732.
- c) E-mail Address: PRIVACIDAD@MARIVALGROUP.COM
- d) Telephone number: 322 2268200

You may revoke your consent for the use of your personal information. You may revoke the consent, that in your case, you have granted to us for the handling of your personal information. However, it is important that you consider that not in all cases, will we be able to attend your request or immediately terminate its use, because it is possible that due to a legal obligation, we may be required to continue handling your personal information. Also, you must consider that for certain purposes, the revocation of your consent shall imply that we may no longer be able to provide the services that were requested from us, or the termination of your relationship with us.

To revoke your consent, you may present a request through the following means:
E-MAIL PRIVACIDAD@MARIVALGROUP.COM

In relation to the procedure and requirements for the revocation of your consent, we inform the following:

- a) Through what means may the principal's identity be ascertained, and in its case, it's legal representative as well as the authorities of the latter?
ATTACH A COPY OF THE OFFICIAL ID, AS WELL AS THE CONSTITUTIVE ACT (IN RELATION TO LEGAL ENTITIES). WHEN LEGAL ENTITIES OR REPRESENTATIVES OF NATURAL PERSONS, THE REPRESENTATION MUST BE ASCERTAINED BY A PUBLIC INSTRUMENT OR PROXY SIGNED BEFORE TWO WITNESSES, THE DECLARATION IN PERSONAL APPEARANCE OF THE PRINCIPAL.

- b) What information and/or documentation shall the application contain?
A DESCRIPTION OF THE PERSONAL INFORMATION IN RESPECT TO WHICH THE REVOCATION OF THE CONSENT REFERS TO, AND PREFERABLY, (WITHOUT IT BEING A REQUIREMENT) THE REASONS FOR THE REQUEST.
- c) What is the term in which we will respond to your request?
20 DAYS
- d) What means shall we use to communicate our response to your request?
BY E-MAIL. Alternatively, in case the principal does not have an email address or does not want the response to be sent thru that means, it will be sent thru courier or postal service.
- e) For more information regarding the procedure, we have the following means available:
The Principal can contact our Personal Data Protection Department in the email address privacidad@marivalgroup.com and physically located in Paseo de los Cocoteros s/n, hotel Marival Resort & Suites, fraccionamiento Nuevo Vallarta, Municipality of Bahia de Banderas, Nayarit, zip code 63732, phone number 322-2268200 (line 4493).

How can you limit the use or disclosure of your personal information?

With the purpose of limiting the use or disclosure of your personal information, we offer the following means:
THE CLIENT MAY LIMIT THE USE OR DISCLOSURE OF THEIR PERSONAL INFORMATION BY SENDING AN E-MAIL WHERE THE CONCRETE QUESTION IS SENT TO THE E-MAIL ADDRESS PRIVACIDAD@MARIVALGROUP.COM

Additionally, we inform you that we have the following lists of exclusion, wherein you can register so that your personal information are not used for certain purposes.

Name of Listing	Purposes that apply to the listing	Means to obtain further information
MARKETING	MARKETING OR ADVERTISEMENT	PROMOS@MARIVALACCESS.COM
MARKETING	NOTICES	COMUNICADOS@MARIVALRESORTS.COM.MX

The use of tracking technologies in our Internet website

We inform you that in our website we use cookies, web beacons and other technologies, through which it is possible to monitor your behavior as an Internet user, as well as to provide you with a better service and experience while navigating in our website. The personal information that we collect through these technologies, we use for the following purposes:

TO MONITOR AND PREVENT THE UNAUTHORIZED USE OF DIGITAL PLATFORMS; TO IMPROVE OUR DIGITAL TOOLS AND UPDATE THEN IN CONFORMITY WITH THE EVOLUTION OF TECHNOLOGY; AND TO OFFER PERSONALIZED CONTENT.

The personal information that we obtain from these tracking technologies are the following:

- IDENTIFICATIONS, USER NAMES AND PASSWORDS OF A SESSION
- LANGUAGE PREFERRED BY USER,
- REGION WHERE THE USER IS IN
- TYPE OF NAVIGATION OF THE USER
- TYPE OF OPERATING SYSTEM OF THE USER
- WEBSITES VISITED BY A USER
- SEARCHES CARRIED OUT BY A USER
- ADVERTISEMENTS CLICKED ON BY USER

These technologies can be disable by taking the following steps: YOU MAY CHANGE THE SECURITY SETTINGS OF YOUR BROWSER TO ACCEPT OR BLOCK COOKIES. FOR MORE INFORMATION, IT IS SUGGESTED THAT YOU SEARCH GOOGLE WITH A QUERY CONTAINING THE FOLLOWING PHRASE/ "HOW TO MANAGE COOKIES IN [NAME OF BROWSER USED]?/"

How will I know of changes in this privacy disclaimer?

This privacy disclaimer may be modified, changed or updated derived from new legal requirements; because of our own needs or because of the change in products or services that we offer; our privacy practices, our changes in business model, or because of other causes.

We commit ourselves to keep you informed in regards to the changes that this privacy disclaimer may have, through: THE SENDING OF E-MAIL AND IN THE INTERNET WEBSITE.

The procedure by which notices of changes or updates to this privacy disclosure is the following:

THE CHANGES OR UPDATES TO THE PRIVACY DISCLAIMER SHALL BE MADE KNOWN BY THE MEANS THAT ARE DESCRIBED IN THIS POLICY AND SHALL BE EFFECTIVE 1 WEEK AFTERWARDS. IN CASE OF DOUBTS OR COMMENTS, THE CLIENTS MUST DIRECT THEMSELVES TO **PRIVACIDAD@MARIVALGROUP.COM**

Initials