

PRIVACY POLICY

Welcome to the official website of the Kingdom of Mount Vema, www.mountvema.com, owned and operated by the Vema Seamount Authority, and its licensed, affiliate and authorized corporations, successors, and assigns (collectively referred to as "Mount Vema"). All Products and Services on the www.mountvema.com are made available subject to this Privacy Policy. By using our Products and Services, you agree, without limitation or qualification, to be bound by this Privacy Policy or any other privacy or data collection policy applicable to any individual Web site administered by the Kingdom of Mount Vema and to receive any required legal notices regarding our privacy practices through the continuous posting of a clear and conspicuous link to the current version of this Privacy Policy throughout the Kingdom of Mount Vema web pages. If you become an inactive user, we will adhere to the policies and practices as described in this Privacy Policy, which may be revised from time to time.

Please note that www.mountvema.com contains links to other sites and occasionally allows other sites to be co-branded with the Mount Vema name. Web sites that are linked to Mount Vema sites or carry the Mount Vema brand for co-branding or marketing purposes may have privacy policies which differ from that of the Kingdom of Mount Vema.

The Privacy Policy of www.mountvema.com discloses our privacy practices and contains detailed information about the following:

1. What information of yours does the Mount Vema collect?
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1. WHAT INFORMATION OF YOURS DOES MOUNT VEMA COLLECT?

The Kingdom of Mount Vema aims to be a reliable online services provider by providing the information, services, and product offerings that are most relevant to you through its official website – www.mountvema.com. While you are not required to register for any services on www.mountvema.com, some Products and Services may not be provided unless you provide the relevant and required information.

Information collected online is usually defined as being either **anonymous** or **personally identifiable**.

1. **Mount Vema collects anonymous information**, which refers to data that cannot be tied back to a specific individual. For example, Mount Vema collects some information each time a visitor comes to a Mount Vema site so we can improve the overall quality of the visitor's online experience. Mount Vema collects the visitor's IP address, referral data (e.g., the Internet address of the last Web page visited by a user before clicking over to a Mount Vema site), and browser and platform type (e.g., an Explorer browser on a Microsoft platform). Mount Vema collects this user information for purposes of internal reporting, product monitoring, product improvement, and targeted advertising. In addition, Mount Vema collects your responses to online surveys displayed on Mount Vema sites; these anonymous and optional surveys will seek your opinions about the Products and Services or the advertisements displayed on Mount Vema sites. You do not have to register with the Mount Vema before we can collect this anonymous information.
2. **Personally identifiable information** refers to data that tells us specifically who you are, such as your name and postal address. Mount Vema collects personally identifiable information in the following ways from different parts of its network of Web sites:
 1. **Mount Vema Online Registration:** When you register to use one or more Products or Services on the Mount Vema website, you may provide Mount Vema with such information as your name, postal address, ZIP Code / Postal Code, email address, birth date, gender, telephone number, occupation, marital status or other information. While not all of this data is required for our services to function, we are better

able to customize your experience if you volunteer complete and accurate information.

2. **Other Registration:** In addition to registration for various Products or Services on Mount Vema websites, we may ask you for personally identifiable information at other times, including when you enter a contest or promotion sponsored by Mount Vema. As described below, our co-brand partners also may ask for personally identifiable information. If you apply for a product or services that require payment, we will ask for a valid credit card number. If you choose not to provide the requested information, Mount Vema may not be able to offer or provide you some of the personalized services that depend on this type of information to function.
3. **Correspondence:** If you contact Mount Vema, we may keep a record of that correspondence. We do not collect any email addresses of those who communicate with Mount Vema via email. We use the information provided so that we may respond to the email.

Mount Vema reserves the right to collect certain information and store it in connection with your account. This information includes information about the different sites that you visit within the Mount Vema websites as well as the time and frequency at which you visit them. This information also includes the content that you transmit or post on Mount Vema websites.

2. WHAT ORGANIZATION IS COLLECTING THE INFORMATION?

When you contact Mount Vema to apply for a product or service, that information is generally collected and maintained solely by Mount Vema unless specifically stated otherwise at the point of collection. If data is collected and/or maintained by any company other than Mount Vema, we will tell you at the point of collection. If you do not want to share your information with that company, you can choose not to use that service.

Mount Vema provides several products and services across its websites. These products and services may be supported, sponsored or co-sponsored by third-party companies. Data collected during certain types of transactions are typically shared

with other service providers, sponsor or co-sponsor. Mount Vema will inform you at the point of collection whether or not we are sharing your personal data as a result of a specific transaction or your participation in a promotion. If you do not want to have Mount Vema share your data, you can choose not to provide your data or participate in any promotion.

Be aware that Mount Vema sponsors and other advertisers have links on Mount Vema websites that take you to external sites. Some of these sites may collect personally identifiable information from you, and third-party advertising networks for Mount Vema may use cookies and Web beacons in their advertisements to collect certain information from you. Please see Section 7 of this policy for more information about advertising on the Mount Vema websites. While Mount Vema hopes that all third parties involved adhere to our policies regarding the privacy of our users, Mount Vema Privacy Policy does not cover third-party data collection practices and does not assume any responsibility for any actions of third parties.

3. WHAT ARE "COOKIES" AND "WEB BEACONS" AND HOW DOES MOUNT VEMA USE THEM?

In addition to the personally identifiable information that Mount Vema actively collects when you contact us, we also collect anonymous information passively using **cookies** and **Web beacons**. This technology plays an important role in making the Internet work, but there is much confusion among Internet users about what cookies and Web beacons are and how they are used. A **cookie** is a small text file containing a unique identification number that is transferred from a Web site to the hard drive of your computer so that the site administrator may identify your computer and passively track its activities on the Web site. This unique number identifies your Web browser to our computer system whenever you visit one of the Mount Vema sites. A cookie will not allow a Web site to learn any personally identifiable information (such as your real name and address) that you have not otherwise disclosed.

Cookies allow Mount Vema to automatically remember your Web browser when you visit our network of web sites. To help serve you better, Mount Vema generally uses cookies to:

0. **Allow us to deliver products and services more efficiently.** By storing certain information on cookies or

associating cookies with profile information stored on our computers, we can deliver products and services that use such information more quickly and efficiently for more users. This information is normally saved in an encrypted form that only Mount Vema can interpret.

1. **Measure statistics** such as audience size and traffic patterns. This information is only collected in aggregate form and will not be linked to your personally identifiable information.
2. **Display advertisements.** Cookies let us know whether a Web browser has seen a particular advertisement (so we can show you a variety of material) and count the number of advertisements displayed to a particular browser. We also use cookies to customize the advertising you see based on non-personally identifiable demographic information that you provide when you register. Third-party advertising networks for Mount Vema may issue cookies on Mount Vema sites and other sites when serving advertisements.

The use of cookies by our partners is not covered by our privacy policy. We do not have access or control over these cookies. The use of cookies is an industry standard, and they are currently used on most major Web sites. It is possible to adjust your Web browser preferences to alert you when a cookie is sent to your hard drive, or to refuse cookies altogether. While Mount Vema does not require you to use cookies, keep in mind that certain sites and services will not function properly if you set your browser to refuse all cookies.

Web beacons, also known as clear GIFs or single-pixel GIFs, are small image files that Mount Vema may place on Web pages and within Web-based email newsletters or correspondence that we send. Working in conjunction with cookies, Web beacons allow Mount Vema to accurately count the number of unique users who have visited a specific Mount Vema webpage and the number of times those pages are displayed. We can also use Web beacons to let us know how many people opened a Web-based email newsletter or some types of email correspondences. This information is only collected in aggregate form and will not be linked to your personally identifiable information.

Without cookies and Web beacons, it would be difficult for Mount Vema to know which services have a larger audience than others. Tracking audience size helps us to better understand when to launch new services and enhance the current offerings. Keep in mind that any image file on a Web page can act as a Web beacon.

Third-party advertising networks for Mount Vema may use Web beacons in their advertisements.

Because Web beacons work in conjunction with cookies, you can prevent our Web beacon from collecting anonymous information by setting your Web browser to refuse all cookies or Mount Vema cookie in particular. Web beacons are built into our Web pages, so non-functional Web beacons will continue to appear even if you refuse the Mount Vema cookie.

Third parties use flash cookies, also known as "local shared objects," on our sites that employ Flash technology. Flash cookies are small files similar to browser cookies and are used to remember the site's settings to personalize the look and feel of the site. Like normal cookies, Flash cookies are represented as small files on your computer.

Our Web site also includes Social Media Widgets, such as the Facebook Like button and Widgets, such as the Share this button. These Features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our Site. Your interactions with these Features are governed by the privacy policy of the company providing it.

4. HOW DOES MOUNT VEMA USE THE INFORMATION IT COLLECTS?

Any personally identifiable information you share with Mount Vema when contacting www.mountvema.com for Products and Services from any of our network sites is maintained and accessible only by Mount Vema unless specifically stated otherwise. Most Products and Services are available to you at no cost, and Mount Vema displays advertisements so we can continue to provide great content and services free of charge. We can also better prepare future content based on your interests.

The following are examples of how the Network may use the information it collects:

0. Mount Vema uses the information collected (both anonymous and personal) to personalize and enhance the content you see on the website, such as travel services, news, stock portfolios, weather reports, advertisements and more.

In some cases, our Products and Services cannot work unless you have volunteered accurate information.

1. Mount Vema collects anonymous data and shares it with third-party advertisers in an aggregate form. We will disclose to those advertisers the numbers of Mount Vema users who have certain demographic characteristics and the number of those people who have seen and "clicked" on a particular display. We will also disclose to those advertisers the overall demographics available regarding who saw and "clicked" on their advertisement. In addition, we may disclose anonymous results from online surveys to third-party advertisers or to Mount Vema's product and service providers. No personally identifiable information will be disclosed as part of this process.
2. Mount Vema also uses the aggregate data to perform statistical analyses of the collective characteristics and behavior of visitors, to measure user demographics and interests regarding specific areas of Mount Vema, and to analyze how and where best to use our resources. Without such data, we would not know which parts of Mount Vema are the most popular, and we would not be able to change and update the content and services appropriately. Please note that we may share this aggregate information with third-party companies.
3. Mount Vema collects an aggregate list of search terms. This information is collected anonymously and used primarily for the purposes of product development, monitoring, and improvement, as well as targeted advertising. Please note, however, that we may share this anonymous information with third-party companies.
4. Mount Vema sometimes uses an individual registered user's data to "pre-populate" online forms that are displayed for the purpose of collecting additional individual data by www.mountvema.com, selected third-party sites, and/or sponsors and advertisers.
5. Mount Vema may, from time to time, use your information to contact you about changes or enhancements to Products and Services, issues regarding your account, or Terms and Conditions violations or suspensions of account.
6. If you told Mount Vema that you were interested in receiving special offers from select Mount Vema clients, Mount Vema or third parties on Mount Vema's behalf (i) will send you email and postal mail about products and

services that we feel may be of interest to you, and (ii) may combine information we have about you with information we obtain about you from third parties for the purpose of providing you with more appropriate products, services, and offerings. If you do not wish to participate in this program, please follow the opt-out instructions set forth in Section 8 of this policy.

7. **Paying Customers:** Your debit or credit card information is used to collect fees associated with products and services you requested from Mount Vema.

5. WITH WHOM DOES MOUNT VEMA SHARE THE INFORMATION THAT IS COLLECTED?

We will share your information with third parties only in the ways that are described in this privacy policy. We do not sell your personal information to third parties. Whenever you provide registration information on co-branded or private label sites, that data may be shared with the third-party company providing the service. You should make every effort to read the individual privacy policies of such third parties and make an informed decision on your own whether to continue based upon these sites' privacy practices and your own discretion. **You may opt-out of sharing your information with such providers by choosing not to use that service or content.**

When you find goods or services through Mount Vema websites, you submit data directly to the individual merchants from whom you order goods or services. Please review carefully the privacy policies of particular merchants that you access through Mount Vema Shopping.

In addition to finding co-branded and private label sites, you will find direct links on our site to sites offered by third parties. Some of these sites are authorized to use Mount Vema brands and/or logos. No third-party sites are covered by this Privacy Policy. If you feel that a site using a Mount Vema brand and/or logo does not follow an acceptable privacy policy, please contact Mount Vema Privacy Site Coordinator by email at webmaster@mountvema.com.

Mount Vema may disclose information about individual users to third parties who agree to provide services to Mount Vema and who agree to maintain the confidentiality of such information in accordance with this Privacy Policy. These third parties may

provide a variety of services to Mount Vema, including, without limitation, processing and storing user information, helping to create new content and promotions for Mount Vema, sending or coordinating the sending of marketing communications that users have consented to receive, and targeted advertising. These third party service providers are authorized to use your personal information only as necessary to provide these services to us. Mount Vema will disclose information about individual users to governmental or judicial authorities or law enforcement agencies, or to other individuals or entities in response to subpoena, court order, or other legal process. In matters involving a danger to personal or public safety, Mount Vema may voluntarily provide information to appropriate governmental authorities.

If you elect to receive Offers for Mount Vema, Mount Vema will release personally identifiable information to the applicable sponsor or advertiser. Information released may include name, email address, postal address and other information supplied. Please note that the sponsor or advertiser will not be bound by this Mount Vema Privacy Policy.

If a division (company) or a service provided by Mount Vema is acquired by or merged with another company, the division or service provider may transfer personally-identifiable information about you to that company. Mount Vema will notify you in the event that your personally-identifiable information is transferred under these circumstances and becomes subject to a different privacy policy.

If a third party acquires, or otherwise receives in a transaction with Mount Vema, one or more of the Mount Vema Products and Services, then Mount Vema will transfer personally-identifiable information about users of those Products and Services to the third party. The third party will handle the Products and Services in accordance with its own policies and procedures and not in accordance with Mount Vema policies and procedures. You will be notified if your personally-identifiable information is transferred under these circumstances by an email sent to the email address you provided or by a posting on the site that offers the relevant Products or Services.

6. WHAT ARE THE POLICIES CONCERNING ADVERTISING ON MOUNT VEMA WEBSITES?

We use third-party advertising companies to serve ads and collect information when you visit www.mountvema.com. These companies may use information (not including your name, address email address or telephone number) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. Third party advertisers' use of cookies is subject to their own privacy policies.

7. WHAT IS THE OPT-OUT POLICY FOR THE MOUNT VEMA?

You can opt out of sharing your personally identifiable information with any third-party service or content providers in any areas of the Mount Vema websites by choosing not to use such areas.

In addition, you may opt-opt of sharing your personally identifiable information with third-party service providers and sponsors by clearing the appropriate checkboxes at the point of initial collection.

8. WHAT KINDS OF SECURITY PROCEDURES ARE IN PLACE TO PROTECT AGAINST THE LOSS, MISUSE OR ALTERATION OF YOUR INFORMATION?

Mount Vema has security measures in place to attempt to protect against the loss, misuse and alteration of your user data under our control. Mount Vema uses physical, electronic, and procedural safeguards to protect any personally identifiable data stored on its computers. Only authorized employees have access to the information you provide us.

While we cannot guarantee that loss, misuse or alteration to data will not occur, we take many precautions to prevent such unfortunate occurrences.

9. HOW DOES MOUNT VEMA COMPLY WITH THE CHILDREN'S ONLINE PRIVACY?

The Children's Online Privacy Protection Rules of Mount Vema provides safeguards to protect children who use the Internet by regulating the online collection of personal information from children under the age of 13.

10. WHERE IS PERSONALLY-IDENTIFIABLE INFORMATION STORED AND PROCESSED?

Personal information collected by Mount Vema may be stored and processed in any other country in which the Kingdom of Mount Vema or its agents maintain facilities. By using www.mountvema.com, you consent to any such transfer of information outside of your country.

11. WHAT YOU CAN DO TO BETTER PROTECT YOURSELF ON THE INTERNET?

Know the risks.

Meeting new people in an online community (chat room, forum, newsgroup, message board, Web page, etc.) is one of the best things about the Internet, but you should always be careful about disclosing personal information such as an actual name, member name, email address, and so on. This information may be collected and used by others within the online community to send unsolicited email messages from other parties, outside Mount Vema. Some of the messages you receive may be useful to you, but some may not.

Educate yourself.

Search the Web for as much information as you can about how to protect your privacy. Look for a privacy policy on the Web sites you visit.

Contact Us

Questions regarding this policy should be directed to:

government@mountvema.com

Updates

Mount Vema will update this policy from time to time so please check back periodically. When such changes occur, you will see the word "Updated" next to the Privacy Policy link on the front page of each site on the network. If at any point we decide to use personally identifiable information in a manner different from that stated at the time it was collected, we will prominently post such changes prior to implementing them.

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