**Private Policy**

**HOW WE PROTECT AND USE INFORMATION**

**Privacy Policy**

**UPDATED: August 1, 2018**

**Overview**

Bus Concierge and its affiliates and subsidiaries considers Client privacy important. This Privacy Policy describes the online and offline practices of Bus Concierge regarding how we collect, use, disclose and store information about our clients, including through our websites such as busconcierge.com

This Privacy Policy describes:

* The information that we collect
* How we use the information we collect
* How we may share the information with third parties
* The security of your information

**PLEASE REVIEW THIS PRIVACY POLICY CAREFULLY.** When you submit information to us, including through the Website or through a mobile application, you consent to the collection and processing of your information as described in this Privacy Policy. By providing us with information or using the Website, you accept the terms of this Privacy Policy and, if you are using our Website, our [Terms of Use](https://midatlantic.aaa.com/about/terms-of-use), and consent to our collection, use, disclosure, transfer, retention and removal of your information as described in this Privacy Policy.

**IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY POLICY, THEN PLEASE DO NOT PROVIDE ANY INFORMATION TO US.**

**CONSUMER PRIVACY NOTICE**

If you do business with any of our affiliates that may deliver services such as Roadside Service or Maintenance Work we provide special information on our use of the information those affiliates collect, use and share in the section at the end of this Privacy Policy labeled **“Consumer Privacy Notice For Emergency Services.”** Please refer to that section for information on the privacy practices of our affiliates that may deliver Emergency Rescue services. For the rest of our affiliates and subsidiaries, the information in this Privacy Policy applies.

**YOU CONSENT TO RECEIVING ANNUAL NOTICES OF OUR CONSUMER PRIVACY NOTICE VIA THE WEBSITE, IF APPLICABLE. THE CONSUMER PRIVACY NOTICE IS AVAILABLE AT THE END OF THIS PRIVACY POLICY.**

**We may change or modify this Privacy Policy from time to time. If we make any changes to this Privacy Policy, we will post the effective date of the update on this Privacy Policy or may notify you by email or as otherwise required by applicable law. Therefore, we ask you to check this Privacy Policy occasionally to be sure that you are aware of these changes. If we make any material changes as to how we use or share your personal information, we will also provide clear notice on our website and will obtain your consent, if required.**

**Information We Collect**

**What We Collect Online**

We collect certain “Personal Information” (as defined below) about our Clients when it is provided it to us while using the Website or other online resources, including social media resources and mobile applications. For example, a Client may provide us with information when a client fills out online a service request, or when a Client responds to a survey. “Personal Information” includes (a) contact information (such as name, address, email address and telephone number), (b) demographic information (such as age, date of birth, gender and marital status) and (c) information related to transactions with us (such as payment histories, account balances, credit card numbers, driver’s license numbers, VIN numbers, insurance policy numbers and utilization of Roadside Assistance). For each visitor to our Website, our web server automatically collects the visitor’s IP address. We also collect non-personally identifiable information about visitors’ web activity and equipment. This information includes the operating system a visitor is using, the date and time the user visited the Website, referring URLs (what website the visitor came from), Internet service provider, browser type, device identifier, and information on the pages that visitors’ access or visit. Most non-personally identifiable information is collected via cookies or other analysis technologies, and is discussed in greater detail below under “Cookies and Interest-Based Advertising.”

**What We Collect Offline**

We may also obtain information about our client through interactions with us outside of our website, such as in person, over the phone or by mail, text or email. For example, we may obtain Personal Information about a Client when a Client provides us a completed Service Request or other forms, or survey responses. When calling Bus Concierge, a Client location may be obtained to route your call to the nearest Client’s Roadside Assistance Center. We may also obtain Personal Information about Clients from third parties, including information about services our Client may have purchased through an Affiliate. For example, if you charter a Bus through a Bus Concierge arrangement with one of our Affiliates, we may be provided with Personal Information regarding your Charter. In addition, data we receive from third-party providers helps us verify information a Client has given us or to add demographic or other information to help us better understand each Client’s potential needs for additional products or services. We may combine information that we receive about a Client from our Website with information we receive about a Client from offline sources.

**How We May Use Information**

We may use the information we collect (including Personal Information) individually or combine it with other information to generate aggregate statistical information. When we aggregate information it does not identify a Client personally. The primary uses of the information include:

* To provide products and services you have requested or are entitled to receive as a Bus Concierge Client
* To operate, improve and personalize the services we offer, and to give each Client a more consistent and personalized experience when interacting with us online and offline;
* For customer service, security, to detect fraud or illegal activities, and/or for archival and backup purposes in connection with the provision of the Website and our services;
* To send or have third parties send marketing materials and communications to our Clients about products and services we think may be of interest to our Clients;
* To communicate with our Clients, or respond to your inquiries, including through email;
* To perform market research via surveys to better serve each Client needs and to improve the effectiveness of our Website, our Client experience, our various types of communications, advertising campaigns, and/or promotional activities;
* To show online advertisements that are more relevant to each Client’s interests;
* To cooperate with law enforcement or other regulatory agency activities;
* To enforce our Privacy Policy, Terms of Use, or other applicable policies; and
* To otherwise conduct business.

**How We May Share Information**

We may share and disclose information including Personal Information as described at the time information is collected or as follows:

**With Our Affiliates and Certain Non-Affiliated Companies**

We may share information about Clients, including Personal Information, with our affiliated companies, and preferred travel partners, that provide goods and services to our Clients. We only share our Clients information in this way to offer products and services that may meet our Clients interests and needs and to effect transactions that Clients authorize or request. The companies outside our own affiliates are permitted to use this information to promote their products and services to you and are not permitted to share your information or to use it for any other purpose without our specific consent. We are not liable for the privacy policies of such non-affiliated companies.

Federal law allows Clients to limit some, but not all, marketing from our affiliates.

**With Our Service Providers**

We share information, including Personal Information, with our service providers so that they can perform the functions for which we engage them. We may share information as needed to operate the Website and other aspects of our business.

**For Legal Purposes**

We also may share information that we collect to enforce our rights, protect our property or protect the rights, property or safety of others, or as needed to support external auditing, compliance and corporate governance functions. We will disclose information, including Personal Information, as we deem necessary to respond to a subpoena, governmental request or other legal or regulatory process or to comply with reporting and other legal requirements.

**Corporate Changes**

We may transfer information, including your Personal Information, in connection with our, or any of our affiliates’ participation in (in each case whether in whole or in part) a merger, sale, acquisition or other change of ownership or control by or of us or any affiliated company.

**Security of Your Information**

We utilize industry standard internal security practices to safeguard the information we have about you. We use administrative, technical and physical safeguards designed to restrict access to all of your Personal Information and account information to those Bus Concierge employees or service providers who need to know that information in order to serve you. However, the security of information transmitted through the Internet or via e-mail or other means, can never be guaranteed. We are not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of data. Users of the Website are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of the Website. You should recognize that your use of the Internet and the Website is solely at your own risk. If any breach of security is suspected we may suspend your use of any of the Website, or other systems, without notice, to protect you and your data while we investigate the issue. Access to and use of password-protected and/or secure areas of any of the Website or other systems is restricted to authorized users only. Unauthorized access to such areas is prohibited.

**Mobile Computing**

We may provide websites and online resources that are specifically designed to be compatible with and used on mobile computing devices. Mobile versions of our Website or mobile applications may require that users log in with an account. In such cases, information about the use of each mobile version of the Website may be associated with user accounts. In addition, we may enable individuals to download an application, widget or other tool that can be used on mobile or other computing devices. Some of these tools may store information on mobile or other devices. Some of these tools may store information on mobile or other devices. These tools may transmit information to us to enable you to access user accounts and to enable us to track use of these tools. We may use personal or non-identifiable information transmitted to us to enhance these tools, to develop new tools, for quality improvement and as otherwise described in this Privacy Policy or in other notices we provide.

**Emails and Text Messages**

You may receive emails or text messages from us. You can unsubscribe by clicking on the links available in our emails, or as may be stated in the text message, or by contacting us as provided in this Privacy Policy.

We try to strike a balance between the security of your Personal Information and account information and your convenience. We note that we may send you an e-mail or a text message in unencrypted form (i.e. instantly readable) because many of our members and customers are unable to access encrypted (i.e. coded) e-mails or texts. This means that such message, if misrouted or intercepted, could be read more easily than encrypted messages. For this reason, please do not include confidential information, such as your credit card number or account passwords, in any unencrypted e-mail or text you send to us.

On our Website, you may be able to choose to use a send or share service to send information from the Website to someone else. In such case we will ask you for information such as their email address as well as your name and email address. The information you provide will be used to send a single message by us on your behalf. This information will not be collected or stored for any additional purpose. By providing us with this information you affirm that you are entitled to provide it to us.

**Social Media**

We may also enable you to post content to social networking sites (e.g. Facebook). If you choose to do this you acknowledge that you are responsible for your use of a social networking site. We are not responsible for the availability or accuracy of such social networking sites or your use of such sites. You also should not include any confidential information in any post you make to a public area of a third party social network page, especially since any such posting immediately becomes public.

**Linking From Bus Concierge to other Websites**

For your convenience, we may provide links on our Website to third party websites. We may also link to third party websites of our service providers so that they can provide you with the products or services that you request. For example, when you book travel through certain of our affiliates, we may direct you to the booking system of our third party service provider which is hosted by them on their own website. Please remember that this Privacy Policy is not applicable to such third party websites and that we are not responsible for the privacy practices of third parties. Your browsing, use of your email address and interaction on any other website, including sites which have a link on this Website, are subject to the terms, conditions, and privacy policies of that website. Please read over those terms, conditions and policies before proceeding.

**Children**

We do not knowingly collect or maintain Personal Information from any person under the age of thirteen. No parts of our Services are directed to or designed to attract anyone under the age of thirteen.

**Our commitment to you.** Our mission is to provide quality services that meet our client’s needs for security, This statement is intended to provide you an understanding of our collection, use and protection of private and confidential information.

**What you should know.** We are committed to each client to keep information about each of our clients secure and confidential. It’s important for each client to know that we do not share any client of Bus Concierge with marketers outside of Bus Concierge and our preferred vendors. If you so desire, you may tell us you don’t want to receive direct marketing offers from us or from our preferred vendors. We carefully manage information to assist each client in a roadside emergency, which includes road side mechanic, bus repair shops, towing, on-site tire changes, emergency bus service and bus washing to provide you with excellent service. Our goal is give you the best service and provide convenience.

**What the statement covers.** This policy covers Client Information, which means personal information about a current or former relationship with Bus Concierge.

**Making the security of information a priority.** Keeping Client Information secure is one of our top priorities. We value our clients trust and handle information about each client with care. We limit access to client information to those employees who need it to provide services to our clients. We maintain physical, electronic and procedural safeguards and continually assess and implement new technologies for protecting information when appropriate.

**Collecting information.** We collect and use various types of information to service each client’s request. This will save each client time and money and give Bus Concierge better understanding of each client’s needs. We want to help our clients learn more about Bus Concierge services to keep their buses moving down the road.

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* Information you provide to us on applications, travel requests and payments
* Information about your use of services such as emergency roadside assistance requests, your *Charter Services*, trip plans and maintenance services
* Other general information we obtain about you that may help us better serve you, such as demographic information.

**Managing information for your convenience.** The information we use helps us bring each client reliable services and savings but most importantly, peace of mind on the road. We limit who receives affiliates information and what type of information is shared with our affiliates... Bus Concierge is looking for nationwide affiliates to help keep the buses moving across the country.

**Sharing information with companies that help us deliver services to you.** We may share client’s information with companies that work with us to provide you services. We share the information in order to provide you a good customer experience. These companies may include companies such as servicing garages, group tour companies, Charter Bus Companies, Roadside Mechanics, Maintenance Facilities, Towing, On-site Tire Changing, Bus Wash and Dump, DOT Compliance and Driver Hiring Services. All of these companies are contractually obligated to keep the information that we provide to them confidential and they use the information only to provide the services we’ve asked them to perform for the client and us.

**Disclosing information in other situations.** We may also disclose client information when required by law. Such disclosures may include those in connection with a subpoena or similar legal process, or a fraud investigation.

**Honoring your preferences.** You have choices when it comes to learning about new offers and services from Bus Concierge. You can choose not to receive savings opportunities and marketing offers by mail, phone and/or e-mail from us.