

ResortPAL™ Privacy Policy

Version September 14, 2005

This document sets forth the policy of ResortPAL™'s owners, Summit Management Resources, LLC and Orion Software, Inc., herein referred to as "Owners," relative to privacy and personal information of the resorts to which they provide services, including resort employees, management, contract employees, agents, and the owners of timeshares, intervals and fractional interests, (collectively referred to herein as "users"). It is the Owners' policy to protect and respect the privacy and personal information of the users. Only the current version of this policy is applicable, and supersedes all previous versions.

Owners will not disclose the contents of users' private communications or data to third parties, subject to the following provisions.

We receive and store any information you enter on our Web site or give us in any other way. You can choose not to provide certain information, but then you might not be able to take advantage of many of our features. We use the information that you provide for such purposes as responding to your requests, customizing features for you, improving our services, and communicating with you. We receive and store certain types of information whenever you interact with us. For example, like many Web sites, we use "cookies," and we obtain certain types of information when your Web browser accesses ResortPAL. We employ other companies and individuals to perform functions on our behalf. Examples include processing requests, sending postal mail and e-mail, analyzing data, and providing customer service. They have access to personal information needed to perform their functions, but may not use it for other purposes.

Owner will not give out personal information of its customers to advertisers, business partners, sponsors, and other third parties in any form other than aggregate usage data. Any financial data or personal identifier information collected shall be stored in encrypted form, and will be made available for future transactions immediately upon request, and stored only for as long as required by applicable regulations. The privacy of all registrant, administrative, technical, and billing contact information collected is governed by the terms and conditions of the Service Level policy.

While Owners will strive to protect your personal information and privacy, even with all the reasonable security measures such as 128-bit encryption, firewalls, user authentication, etc., it is still remotely possible, though we believe highly unlikely, that information could be compromised in transit or by a hacker. Nothing is perfect in the world of the internet. As such, we cannot totally guarantee the security of any information you disclose online and you do so at your own risk.

Owners' policies do not extend to anything that is inherent in the operation of the Internet, and therefore beyond Owners' control, and are not to be applied in any manner contrary to applicable law or governmental regulation. Owners may disclose the contents of users' private communications or data if required to do so by law or in the good faith belief that such action is necessary to:

1. Conform to the edicts of the law or comply with legal processes served on Owners;
2. Identify, contact or bring legal action to defend and protect the rights or property of Owners, its users or anyone else;
3. Act under exigent circumstances to protect the personal safety of its users or the public;
4. Administer the system to maintain performance for its users;
5. Provide authenticated user (registrant, administrative, or technical contacts) with contact information.

As we continue to develop our business, we might sell or buy subsidiaries or business units. In such transactions, customer information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Notice (unless, of course, the customer consents otherwise). Also, in the unlikely event that Owners businesses or substantially all of its assets are acquired, customer information will of course be one of the transferred assets.

Owners' may from time to time change this Privacy Policy and by using the ResortPAL™ application, users consent to the version of this policy as posted on the www.resortpal.com website at the time of use.