

Last Update: March 26, 2024

Northgate Resorts

Privacy Policy

Northgate Resorts and its family of companies, including the following entities Northgate Partners, LLC; and RezPlot Systems, LLC d/b/a Campspot, Northgate Property Services, LLC (“Northgate”, “Company”, “we”, “our” or “us”), we are committed to protecting your privacy and are constantly working to give you a safe online experience. This "Privacy Policy" applies to the Northgate companies listed below and governs data collection and usage. We collect and analyze information about you, your business, and the reservations and other transactions that are made using Northgate. By using the website of Northgate and its family of companies, you consent to the data practices described in this Privacy Policy. Please read our Privacy Policy for more information.

We believe in being clear and open about how we collect data related to you when you visit our websites at www.northgateresorts.com (the “**Website**” or “**Site**”), create an account, use our services or www.northgateresorts.com to search or book a camping destination, subscribe to our newsletter, interact with us, participate in online advertisements or marketing emails, opt-in to receive SMS mobile messages, or engage with any other websites, pages, features, or content we own, operate and/or provide (collectively with the Websites (the “**Services**”) that direct you to this Privacy Notice (“**Privacy Notice**”).

No matter how Northgate comes to have your information, we want you to know that we respect the privacy of your information and that you should be aware of how we handle it. This Privacy Notice is designed to help you understand how we collect, use, share and safeguard the information you provide to us and to assist you in making informed decisions when using our Services.

Websites applications maintained by the applicable Northgate entity:

Website includes the following websites, as applicable, including any related blogs, domains, mobile sites, online services, and applications maintained by the applicable Northgate entity:

www.northgateresorts.com
www.northgateholdings.com
<https://www.lazyriverny.com/>
<https://www.jellystonemaryland.com/>
<https://southjerseyjellystonepark.com/>
<https://www.jellystonehillcountry.com/>
<https://jellystoneguadalupe.com/>
<https://www.campluray.com/>
<https://jellystonetyler.com/>
<https://wichitafallsjellystonepark.com/>
<https://www.jellystonepa.com/>
<https://towerparkresort.com/>
<https://www.towerparkwaterfrontgrille.com/>
<https://towerpark-marina.com/>
<https://jellystoneparkandroskoggin.com/>

<https://lakesregionjellystone.com/>
<https://campgoldenvalley.com/>
<https://www.glenellisjellystone.com/>
<https://wallerjellystonepark.com/>
<https://www.clayspark.com/>
<https://www.jellystonebartonlake.com/>
<https://cranberryacresjellystonepark.com/>
<https://pittsburghjellystone.com/>
<https://www.leelanaupinescampresort.com/>
<https://kittatinny.com/>
<https://www.margaritavilleresorts.com/camp-margaritaville-rv-resort-breaux-bridge>
<https://campfimfo.com/texas-hill-country>
<https://campfimfo.com/waco>
<https://www.ciscogrove.com/>
<https://www.treesiderv.com/>
thebendnsh.com
Vistthebend.com
<https://www.kittatinnyrediscovered.com/>
<https://www.willowridgeevents.com/>
<https://pothos.tech/>
<https://www.squirrelystavern.com/>
<https://campfimfo.com/waco/campout-concert-concert>
<https://staypok.com/>
<https://lakewapusun.com/>
<https://sanmarcosriverresort.com/>
<https://arroyovalle.com/>
<https://riverbottomsfarm.com/>

Types of Information Collected

We collect “Non-Personal Information” and “Personal Information” and the information we collect from you depends on how you use the Services. “**Non-Personal Information**” includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. “**Personal Information**” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, email address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. You do not need to provide Personally Identifiable Information to browse the public pages of the Site. However, to access certain products or services offered through the Site or elsewhere, you may be required to register and provide Personally Identifiable Information.

We collect information from you when you (i) register on the Website; (ii) fill out forms or fields on the Site or offline; (iii) complete an application for a product or service available through the Website; (iv) communicate with us by email, mail, text, telephone, facsimile or other electronic means; or (v) use the Website or authorize us to access any financial information stored or processed by a third party.

Personal Information You Provide Us

We may collect Personal Information from you in a variety of ways, including when you visit the Site, communicate with us through the Site, provide PII in connection with the Services we may offer or events we may participate in. We may collect your name, mailing address, billing address, phone number, payment information, age, gender, email address, preferences, interests, and preferences. We may also collect additional information from you depending on the nature of the transaction.

Identifiers collected may include

First and last name

Alias

Postal/ mailing address

Email address

Telephone number

Cellular telephone number

Gender

Geographic area

Title

Internet protocol address

State drivers' license number

Age

Documents to verify your identity

Your occupation

•Commercial information

Transaction information

Products or services purchased, obtained, or considered

Your purchasing or consuming history or tendencies, along with other preferences and interests

Financial Information about your company

Information about your business

•Geolocation data

•Inferences drawn from this Personal Information to create a profile about you.

We will treat as Personal Information any item that, either alone or together with other information, we could use to identify an individual. Except as described below, we will not share with third parties any Personal Information without your permission.

By providing your Personal Information to us, you explicitly agree to our collection and use of such information as described in this Privacy Policy.

By providing Personal Information belonging to another person, you expressly represent and warrant that you have the authority and right to do so, and that you obtained all appropriate and required consents.

We may also collect your Personal Information from sources that you have authorized to share with us or that you have authorized us to obtain information from.

We collect information about you from third parties related to transactions you are contemplating entering into with us or that you have entered into with us.

If you believe we received our personal information from a source without authority to share your personal information with us, please contact us so that we can resolve your complaint.

Information We Automatically Collect

Northgate may collect information about you automatically when you visit the Site, communicate through the site, or use any of our online Services. We may automatically receive certain information from your browser or mobile device, such as your browser type, the operating system of your device, the URL of the site from which you came and the URL of the site you visit when leaving the Site or any of our online Services, the equipment you use to access the Site, the unique identifier of your mobile device and your activities on the Site, such as webpages you view and how you interact with those webpages. We may also receive your IP address and the name of the internet service provider ("ISP") or your mobile carrier. Depending on your device's settings, we may also receive location data and other types of information sent from third party services or GPS-enabled devices.

As you use the Site or any of our online Services, we may also collect information about such usage and your actions on the Site, such as pages you viewed, access times, and how long you spend on a page. We may use cookies to collect such information, as described in more detail below. This information is considered Non-Personal Information, which we can use for any purpose, including, without limitation, to help us improve the Site or the Services and to enhance your, and other users', experience. We may also convert personal information into Non-Personal Information by excluding information that is personally identifiable. You acknowledge that Non-Personal Information and Personal Information that is converted into Non-Personal Information belongs to Northgate and that Northgate has the right to use such general information as it determines in its sole discretion.

How We Use Your Personal Information

We do not sell or share your Personal Information for purposes unrelated to the services we provide. However, we may share your personal data, including your SMS opt-in or consent status, with third-party service providers that assist in delivering our messaging services. These may include platform providers, mobile carriers, and vendors that help facilitate text message delivery.

We will use your Personal Information to provide the Services that your personal information was shared with us to fulfill. Northgate may use personal information for the following purposes:

- To improve customer service: Your information helps us communicate more effectively with inquiries and existing customers, and to respond to your customer service requests and support needs.
 - To personalize user experience: We may use information in the aggregate to understand how our users as a group use the Services and resources provided on the Site.
 - To improve the Site: We continually strive to improve our Site and the Services based on the information and feedback we receive from you.
 - To provide products or services and to process transactions: Except as otherwise expressly provided in this Privacy Policy, we will use Data for the purposes of fulfilling our duties and providing the Services. North gate may use Non-Personal Information for statistical analysis, product development, research, or other purposes. We may use the information that you

provide about yourself or that you have provided to our clients for the purpose of providing and fulfilling the Services. We do not share this information with outside parties except to the extent necessary to provide the Services.

- To send periodic mail, emails, and surveys: The email address you provide for the Services will only be used to send you information, newsletters, surveys, and updates pertaining to the Services requested, provided, or that we think you may be interested in. It may also be used to respond to inquiries and/or other requests or questions.
- To develop new products or services: We use your Personal Information and Non-Personal Information for research and commercial purposes. The information we collect may be used to develop new Products or Services. Except as otherwise provided in this Privacy Policy, we may use your Personal Information and Non-Personal Information internally or, among other things, to offer our own or third-party Products and Services. Only Northgate, its subsidiaries, its suppliers, and contractors involved in distributing the new Product or Service will have access to your Personal Information. Our subsidiaries, suppliers and contractors will be required to use any PII we provide to them only for that intended purpose and subject to the terms of this Privacy Policy.
- Fulfillment Obligations: Comply with contractual obligations, relevant industry standards, and our policies.
- For marketing: Except as otherwise expressly provided for in this Privacy Policy or except as prohibited by applicable law, Northgate may use your Personal Information and Non-Personal Information to enhance its networking, marketing, social, and recruiting activities, and for other similar business purposes. Northgate may also use your Personal Information and Non-Personal Information to contact you on behalf of external business partners about a particular offering that may be of interest to you. In these cases, your Personal Information is not transferred to the third party. We may also use Personal Information to provide you information regarding new Products or Services or to post testimonials from you related to our Products or Services. Personal Information is not shared with entities outside of Northgate other than service providers who assist us in carrying out these business functions. Northgate does not use or disclose sensitive Personal Information, such as race, religion, or political affiliations, without your explicit consent.
 - Compliance with applicable law: We may disclose your Personal Information as we may in sole discretion determine is necessary or reasonably required to comply with law, applicable regulations, court orders or subpoenas; to enforce our Terms of Use; or to protect our rights, property, or safety; or the rights, property, or safety of others.Security: Mitigate fraud, enhance the security of the Site, and manage institutional risk.
- Change in the Site Ownership: If ownership of the Site or of Northgate changes, whether in whole or in part, information collected through the Site and the Services about you may be transferred to the new owner of the Site and/or Northgate, as the case may be, and any Services can continue. In that case, your Personal Information would remain subject to the terms and conditions of the applicable version of the Privacy Policy.
- Payment Processing: For processing payments related to the Products and Services we provide you.

Use of Non-Personal Information

In general, we use Non-Personal Information to help us improve the Services and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns on the Services. This Privacy Notice does not limit in any way our use or disclosure of

Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

Web Browser Cookies

The Site or our Services may send a "cookie" to your computer. A cookie is a small piece of data sent to your browser from a web server and stored on your computer's hard drive. A cookie cannot read data off your hard disk or read cookie files created by other sites. Cookies do not damage your system. Cookies allow us to recognize you as a user when you return to the Site or use the online Services using the same computer and web browser. We use cookies to identify which areas of the Site or online Services you have visited. We also may use this information to better personalize the content you see on the Site or online Services. Northgate does not store unencrypted Personal Information in the cookies. We also do not link Non-Personal Information from cookies to your Personal Information.

To help us optimize the Site or for marketing purposes, we may allow other authorized third parties to place or recognize unique cookies on your browser. Any information provided to third parties through cookies will be for enhancing your user experience by providing more relevant marketing. Third party servers and tools we use, which may send cookies to users of the Site and may collect information from user, includes:

Adobe Creative Cloud (Typekit): The Adobe Creative Cloud (Typekit) is operated by Adobe. The Adobe Creative Cloud (Typekit) collects anonymous data (ad views, analytics, browser information, cookie data, date/time, serving domains, interaction data and page views), pseudonymous data (IP Address (EU PII), Device ID (EU PII), PII (name, address, phone number, email address, EU- IP address, EU-unique device ID), sensitive (financial information). Aggregate and anonymous data is shared by Adobe with third parties. The Adobe Creative Cloud (Typekit) privacy policy can be found at: <http://www.adobe.com/privacy/policies/typekit.html>.

Facebook Custom Audience: Facebook Custom Audience, operated by Facebook Business (formerly Facebook Custom Audience), collects anonymous data (ad views, analytics, browser information, cookie data, date/time, demographic data, hardware/software type, internet service provider, interaction data, page views, and serving domains), pseudonymous data (IP Address (EU PII), search history, location-based data, Clickstream Data, PII (name, address, phone number, email address, login, EU- IP Address, EU-unique device ID), sensitive (financial information). Facebook Custom Audiences privacy policy can be found at: <https://www.facebook.com/privacy/explanation>. Facebook Business shares data it collects through third parties.

Google Analytics, Google Dynamic Remarketing, DoubleClick, Google Tag Manager, and Google AdWords: Google Analytics, Google Dynamic Remarketing, DoubleClick, Google Tag Manager Google AdWords, and YouTube (collectively, "Google") collect anonymous data (ad views, browser information, cookie data, date/time, demographic data, hardware/software type, interaction data, page views, and serving domains), pseudonymous data (IP Address (EU PII), search history, location-based data, Clickstream Data, PII (name, address, phone number, email address, login, EU-IP address, EU-unique device ID), sensitive (financial information). Google's privacy policy can be found at: <http://google.com/intl/en/policies/privacy>. Anonymous data is shared with third parties. Northgate does not combine the information collected through Google and Personally Identifiable Information.

Some browsers may allow you to manage the storage of cookies on your device. If supported by your browser, you may set your browser to refuse all cookies (or, sometimes all third-party cookies) or to alert

you when a cookie is placed. However, if you select these settings, you may be unable to access certain parts of the Site or the online Services. Unless you have adjusted your browser setting to refuse cookies, the Site and online Services will issue cookies. For more information about how to manage your cookie preferences, use the 'help' menu of your web browser or explore the customer support sections of your web browser. To opt-out of all cookies or certain advertising cookies, visit the company website for your browser for instructions.

You can opt-out of receiving personalized ads from advertisers and ad networks that are members of the Network Advertising Initiative ("NAI") or who follow the Digital Advertising Alliance ("DAA") Self-Regulatory Principles for Online Behavioral Advertising using their respective opt-out tools. The NAI's opt-out tool can be found here: <http://www.networkadvertising.org/choices> and the DAA's opt-out tool can be found here: <http://www.aboutads.info/choices/>.

In addition, your mobile devices may offer settings that enable you to make choices about the collection, use, or transfer of mobile app information for online behavioral advertising (for example, Apple iOS' Advertising ID and Google Android's Advertising ID). Please note that opting out does not prevent the display of all advertisements to you.

AD Platforms

In addition to cookies used on the Site, Northgate also utilizes various ad platforms to provide relevant marketing to consumers. Third party ad platforms that we may use include, but may not be limited to the following:

Meta: The information Meta collects depends on how you use their products. Meta's Privacy Policy can be found here: <https://www.facebook.com/privacy/policy>

Google Ads: Google collects information to provide better services to users — from figuring out basic stuff like which language you speak, to more complex things like which ads you'll find most useful, the people who matter most to you online, or which YouTube videos you might like. The information Google collects, and how that information is used, depends on how you use their services and how you manage your privacy controls. You can read their full policy here: <https://policies.google.com/privacy>

Bing Ads: Bing Ads collects anonymous (ad views, browser information, cookie data, date/time, demographic data, hardware/software type, interaction data, page views, serving domains), pseudonymous (IP Address (EU PII), search history, Clickstream Data), PII (name, address, phone number, email address, login, EU- IP address, EU-unique device ID), sensitive (financial information), and location-based data. We do not combine the information collected through Bing Ads with personally identifiable information. Bing Ads privacy policy can be found at: <https://privacy.microsoft.com/en-us/privacystatement/>

Reddit: Reddit may log information when a user accesses and uses their services. This may include IP address, user-agent string, browser type, operating system, referral URLs, device information (e.e.g, device IDs), device settings, mobile carrier name, pages visited, links clicked, the requested URL, and search terms. You can view their privacy policy here: <https://www.reddit.com/policies/privacy-policy>

Pinterest: When you use Pinterest websites, apps, services, technologies, APIs, widgets, or any other products or features offered ("Pinterest" or the "Services"), you voluntarily share certain information such as account information, content, precise location information, communication with Pinterest, and

your contacts if previously synced. When you use a website, mobile application or other internet service, certain internet and electronic network activity information gets created and logged automatically such as device information, log data, information from cookies or similar technologies, usage data and inferences, location information (IP address), and user choices. You can view their full privacy policy here:

<https://policy.pinterest.com/en/privacy-policy#section-we-collect-information-in-a-few-different-ways>

MNTN: MNTN collects certain information if you contact them, request services, or otherwise provide it, and in each instance only to the extent you provide them with your personal information. This information collected includes: your name, email address, phone number, and any other such information you directly provide. They may also collect certain technical information when you visit the Site. This type of information includes your IP address, country, city, browser type, operating system, service provider, the areas you visit on the Site, time and date of your visit, and Google Analytics client ID. They may collect this technical information through cookies, web beacons, or other similar technologies. They may combine your IP address and other technical information together. View their full privacy policy here: <https://mountain.com/privacy-policy/>

Flip.To: Flip.to collects Personal Data about users when they provide it directly to them, when third parties such as their business partners (e.g. companies with whom we integrate our Service), service providers (such as our advertising service providers) provide them with Personal Data, or when Personal Data is automatically collected in connection with a user's use of their Service. They collect the following Personal Data in connection with the Service: Contact Information: information we collect to identify or contact a user, such as first and last name, email address, and social network handle. User Content: information, visual content (including images and video), written content (including quotes, feedback, and comments), and other content that we may collect that a user posts to or through the Service. Transaction Information: information related to transactions a user conducts on the Service, including registering for a webinar or event, downloading special content, and a user's own interactions with the Service (for example the functionality used and links clicked on the Service). Customer Account Information: information that identifies a customer to the Service, such as first and last name, email address, physical address, telephone number, password, and IP address. Customer Financial Account Information: information that a customer provides in connection with a purchase of the Service (or a purchase made through the Service), including credit card number, credit card expiration date, credit card verification code, bank account number, bank account title, bank name, branch location, and routing number. Log Data: information automatically recorded by the Service about how a person uses our Service, such as anonymized IP addresses, device and browser type, operating system, the pages or features of our Website or Service to which a user browsed, the time spent on those pages or features, the frequency with which the Service is used by a user, search terms used by a user, the links on the Service that a user clicked on or used, and other statistics. They also collect usage and performance information that is not Personal Data or that we aggregate or de-identify so that it no longer personally identifies an individual. They also associate some data that is not Personal Data with Personal Data. View their full privacy policy: <https://www.flip.to/privacy/>.

Embedded Pixels

We may use the Site embedded pixel technologies on selected pages for the purposes of identifying unique user visits to the Site as opposed to aggregate hits. In addition, embedded pixels or other

technologies may be used in emails to provide information on when the email was opened to track marketing campaign responsiveness; information collected using these technologies may be associated with your email address.

Flash Cookies

We may use flash cookies, also known as "local shared object," on the Site that employs 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.

Embedded Urls

We also use a tracking technique that employs embedded URLs to allow use of the Site without cookies. Embedded URLs allow limited information to follow you as you navigate the Site, but is not associated with your Personal Information and is not used beyond the session.

Widgets

The Site may include widgets, which are interactive mini-programs that run on our Site to provide specific services from another company (e.g., links to bookmarked sites). Some information, such as your email address, may be collected through the widget. Cookies may also be set by the widget to enable it to function properly. Information collected by this widget is governed by the privacy policy of the company that created it.

Retention And Storage Of Personal Information

We retain your Personal Information for as long as necessary to fulfill the purpose for which it was collected and to comply with applicable laws. We use reasonable security precautions to protect your information while in storage.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your personal information, whether we can achieve those purposes through other means, and applicable legal requirements.

Security

We will use commercially reasonable methods to keep your Personal Information securely in our files and systems. When credit card numbers are transmitted through a field in a form on the Site requesting credit card numbers, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Do Not Track

Your browser may provide you with the option to send a "Do Not Track" signal to websites you visit. This signal is used to request that websites not send the requesting device cookies, but websites have no obligation to respond to such signal or to modify their operation. At the current time, the Site is not programmed to recognize Do Not Track signals, so the Site will not treat you differently if we receive such signals from your browser and we may not comply with Do Not Track settings on your browser.

Exemptions from the Privacy Policy

Our Privacy Policy does not cover information you send to Northgate via email, instant messaging (e.g., Google, AOL, Yahoo), or social media platforms, even if accessed through links on our website. These communication methods are not considered secure. To protect your privacy, please avoid sharing sensitive information with us through email, instant messages, or social media (e.g., Twitter, Facebook), as such platforms may expose your information publicly.

Links To Other Sites

The Site and the online Services may contain links to other websites. Northgate is not responsible for the actions, practices, or content of websites linked to, or from, the Site or Services. You understand such websites may require you to agree to their terms of use and that we have no control over these terms. As always, you understand it is your responsibility to verify your legal use of a website, and use of information from the website and the corresponding website owner.

Your Rights and Choices

If applicable privacy laws allow, you may have rights over your Personal Information. This includes, but is not limited to:

- **Right to Know.** You have the right to request disclosure about our Personal Information collection practices during the prior 12 months, including the categories of Personal Information we collected, the sources of the information, our business purposes for collecting or sharing the information and the categories of third parties with whom we shared such information. You may request a copy of the specific pieces of Personal Information we may have collected about you in the last 12 months.
- **Right to Delete.** You may request that we delete (and direct our service providers to delete) your Personal Information, subject to certain exceptions.
- **Right to Opt-Out.** You have the right to opt-out of any 'sales' of your Personal Information, if a business is selling your information. For clarity, we do not sell your Personal Information.
- **Non-Discrimination.** You have the right to not be discriminated against for exercising these rights.

You can make the following choices regarding your Personal Information:

1. **Access To Your Personal Information.** You may request access to your Personal Information by contacting us at the address below. If required by law, upon request, we will grant you reasonable access to the Personal Information that we have about you. We will provide this information in a portable format, if required. Note that California residents may be entitled to ask us for a notice describing what categories of Personal Information (if any) we share with third parties or affiliates for direct marketing.
2. **Changes To Your Personal Information.** We rely on you to update and correct your Personal Information. Please update your Personal Information by logging into your account or contact us at the address or via email below, immediately if there are any changes to your Personal Information. Note that we may keep historical information in our backup files as permitted by law.

Deletion Of Your Personal Information. Typically, we retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Notice, unless a longer retention period is required or permitted by law, or as otherwise described in this Privacy Notice. You may, however, request information about how long we keep a specific type of information, or request that we delete your Personal Information by contacting us at the address below. If required by law we will grant a request to delete information, but you should note that in many situations we must keep your Personal Information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes.

If you decide to delete your in-App account, you may do so by selecting “Delete My Account” on your profile page. Deleting your Northgate account in-App will:

1. Sign you out immediately
2. Remove or anonymize any identifiable user information
3. Remove your email from our mailing lists

You will receive an email when account deletion is completed.

1. **Objection to Certain Processing.** You may object to our use or disclosure of your Personal Information by contacting us at the address or email below.
2. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include ‘Do Not Track’ instructions.
3. **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe instructions in e-mails that you receive. If you decide not to receive promotional emails, we may still send you communications related to your use of the Services and administrative purposes for reasons such as providing you with updates to this Privacy Notice.
4. **Revocation Of Consent.** If you revoke your consent for the processing of Personal Information, then we may no longer be able to provide you Services. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity. You may revoke consent to processing (where such processing is based upon consent) by contacting us at the address below.

How to Exercise Your Right(s)

You may enquire about your Personal Information by contacting us as described below in Section 21 below, and we’ll generally respond to all access requests within 30 days of the receipt of all necessary information. As required by law, we will require you to prove your identity before providing you with the Personal Information we hold about you. We may verify your identity by phone call or email. Depending on your request, we will ask for information such as your name or other account information. We may also ask you to provide a signed declaration confirming your identity. Following a request, we will use reasonable efforts to supply, correct or delete Personal Information about you in our files. In circumstances where we are not able to provide access, or if additional time is required to fulfill a request, we will advise you in writing.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. We will require verification that you provided the authorized agent permission to make a request on your behalf. You must provide us with a copy of the signed permission

you have given to the authorized agent to submit the request on your behalf and verify your own identity directly with us. If you are an authorized agent submitting a request on behalf of an individual you must attach a copy of the following information to the request:

- A completed written notice indicating that you have authorization to act on the consumer's behalf signed by you and the consumer.
- If you are a business, proof that you are registered with the appropriate Secretary of State to conduct business in that state.

If we do not receive this information, the request will be denied.

Northgate may not release certain types of information based upon exemptions specified in applicable laws. Where possible, we will sever the information that will not be disclosed and provide you with access to the remaining information. Should we be unable to provide access to or disclose Personal Information to you, we will provide you with an explanation, subject to restrictions.

In certain circumstances, such as where the request is excessive or unfounded, we may charge you an administration fee for access to your Personal Information. We may also charge for additional copies. We will advise you of any fees before proceeding with a request. You may learn more about the process or obtain assistance in completing an access request by contacting us as described below.

Children's Online Privacy Protection Act ("COPPA")

Our Services are not designed for children under 13, and we do not intentionally or knowingly collect Personal Information from users who are under the age of 13 or from other websites or services directed at children. If we discover that a child under 13 has provided us with Personal Information, we will delete such information.

CAN-SPAM Act

Northgate complies fully with the federal CAN-SPAM Act. You may opt out of receiving future email communications from us at any time.

Other Jurisdictions

Personal information that you submit through the Services may be transferred outside of the jurisdiction in which you live. We also store Personal Information locally on the devices you use to access the Services. Your Personal Information may be transferred to other jurisdictions that do not have the same data protection laws as the jurisdiction in which you initially provided the information. The following provisions may apply to you depending on where you are located.

Nevada.

This notice is provided to you pursuant to state law. Nevada state privacy laws permit us to make marketing calls to existing users, but if you prefer not to receive marketing calls, you may be placed on our internal opt-out list by emailing us at info@northgateresorts.com or you may also contact the

Nevada Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Ste 3900, Las Vegas, NV 89101; telephone 702-486-3132; email:AGCinfo@ag.nv.gov.

Although we do not currently conduct sales of personal information, Nevada residents may submit a request directing us to not sell personal information we maintain about them if our practices change in the future. To exercise this right, email us at info@northgateresorts.com with the subject line: "Nevada: Request to Opt-Out."

Vermont.

In accordance with Vermont law, we will not share information we collect about you with companies outside of Northgate except as described herein, or otherwise required or permitted by law.

Virginia.

This Section is only applicable to you if you are a resident of the state of Virginia ("**Virginia Residents**"). If you have a complaint, first contact us at info@northgateresorts.com. We will respond within 45 days after receipt of your request, and such time may be extended for an additional 45 days if it is reasonably necessary. We will notify you of any extension within the initial 45-day period. If you are not satisfied with our responses, you have the right to appeal. We will respond within 45 days of receipt of your appeal. If you still have an unresolved complaint, please direct your complaint to the Virginia Attorney General at service@oag.state.va.us or call (804)786-2071.

Colorado.

If you are a Colorado resident, the Colorado Privacy Act ("**CPA**") provides you with specific rights regarding your personal data, subject to certain exceptions. The CPA also does not apply to certain types of personal data maintained in compliance with specific federal privacy laws, such the Health Insurance Portability and Accountability Act and the Fair Credit Reporting Act, or for certain governmental purposes. For a complete list see CRS §6-1-1304.

The CPA defines "**Personal Data**" as any non-public information that can be linked or reasonably linked to an individual and does not include de-identified data. "**Sensitive Data Inference(s)**" means inferences made by a controller of Personal Data, "alone or in combination with other data, which are used to indicate an individual's racial or ethnic origin; religious beliefs; mental or physical health condition or diagnosis; sex life or sexual orientation; or citizenship or citizenship status."

The CPA provides Colorado Residents with the following rights with respect to their Personal Data:

- The right to opt-out from the sale of their personal data, or use of personal data for targeted advertising and certain types of profiling;
- The right to know whether a controller is collecting personal data;
- The right to access personal data that a controller has collected about them;
- The right to correct personal data;
- The right to delete personal data; and
- The right to download and remove personal data from a platform in a format that allows the transfer to another platform.

To exercise any of these rights please contact us at info@northgateresorts.com. We will respond within 45 days of your appeal, and any such time may be extended for an additional 60 days if reasonably necessary. We will notify you of any extension within the initial 45-day period. If you still have an unresolved complaint, please direct your complaint to the Colorado Attorney General or call 720-508-6000.

Notice to California Residents

To the extent the California Consumer Privacy Act of 2018, Cal. Civ. Code §§ 1798.100 et. seq (“CCPA”) as amended by the California Privacy Rights Act (“CPRA”) is applicable, this Section is only applicable to you if you are a resident of the state of California (“California Residents”), and only applies to personal information for which Company is a “Business” (as defined in the CCPA, as amended). “Personal Information” means information that identifies, relates to, describes, could reasonably be associated with, or could be reasonably linked directly or indirectly with a particular California consumer or household. Personal Information does not include (i) publicly available information from government records; (ii) deidentified or aggregated consumer information; or (iii) information excluded from the scope of the CCPA, as amended, such as:

- health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA), clinical trial data, or other qualifying research data;
- Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), the Farm Credit Act, and the Driver’s Privacy Protection Act of 1994.

CCPA applies to Personal Information we collect from California Residents on or through our Services and through other means (such as information collected offline or in person).

As a Business, we may need to collect certain Personal Information from you. If you do not provide the information that we ask for, we may not be able to provide you with the requested services. Sensitive Personal Information is a subset of Personal Information that requires greater security protections and standards of care in handling. With respect to Personal Information for which you are a “Business” and Northgate is a “Service Provider,” as defined in the CCPA, please see the applicable Service Agreement or Terms of Service, as the case may be.

RIGHTS OF CALIFORNIA RESIDENTS

If you are a California resident or are a California employee or contractor of Northgate, the CCPA as amended, provides you with specific rights regarding your Personal Information, subject to certain exceptions. For instance, we cannot disclose specific pieces of Personal Information if the disclosure would create a substantial, articulable, and unreasonable risk to the security of the Personal Information, your account with us, or the security of our network systems. These rights are explained below:

- **Right against discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against you for exercising your rights.
- **Right to know.** You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months, including the categories of third parties who purchased or received your Personal Information. Northgate

will disclose this information to a consumer upon request a maximum of two times in a 12-month period. Once we receive and confirm your verifiable consumer request, we will disclose the following to you: (i) the categories of Personal Information we collected about you; (ii) the categories of sources from which Personal Information was collected; (iii) the business or commercial purpose for collecting, selling, or sharing Personal Information; (iv) the categories of third parties with whom we shared your Personal Information; and (v) the specific pieces of Personal Information we collected about you.

- **Right to delete.** You have the right to request that we delete any of your Personal Information we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete and will direct our service providers to delete your Personal Information from their records and if applicable, to instruct their service providers or contractors to delete your Personal Information from their records. We may deny your request if it is necessary for us, our contractors or service providers to: (i) complete the transaction for which we collected the Personal Information, provide a good or service that you requested, or reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform services pursuant to our contract with you; (ii) help to ensure security and integrity to the extent the use of your Personal Information is reasonably necessary and proportionate for those purposes; (iii) debug our Websites or App, and/or identify and repair errors that impair existing intended functionality; (iv) exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law; (v) comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Cal. Penal Code § 1546 et. seq. of Title 12 of Part 2); (vi) 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 the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent; (vii) enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which you provided the information; (viii) comply with a legal obligation.
- **Right to Correct.** If applicable, you have the right to request us to correct inaccurate Personal Information about you, taking into account the nature of the Personal Information and the purpose of the processing of Personal Information. Upon verifying the validity of a verifiable consumer correction request, we will use commercially reasonable efforts to correct the inaccurate Personal Information as directed by you and in compliance with CCPA, as amended.
- **Right to Opt-Out of Sale or Sharing of Your Personal Information.** You have the right to opt-out of having your Personal Information, including Sensitive Personal Information, sold or shared for cross-context behavioral advertising. Northgate does not sell Personal Information for money, but our Websites and App may use Cookies or similar technologies as described in our Privacy Notice, which could be considered as a "sale" under the CCPA.

The CCPA defines "sharing" to include certain sharing of your Personal Information for purposes of serving you advertisements that are relevant to you based on your activity across our services and other sites (i.e., cross-contextual behavioral advertising). Like many companies, we use services that help deliver interest-based ads to you, and our Websites and App and may use Cookies or similar technologies that allow advertising partners to collect your Personal Information for their use. If you wish to opt out of having your Personal Information sold or shared for cross-context behavioral advertising please click this link: ["Do Not Sell or Share My Personal Information"](#) and we will process your request.

- **Right to limit the Use and Disclosure of Sensitive Personal Information.** Additionally, you have the right to direct Northgate to limit our use of your Sensitive Personal Information to that information which is expected by an average individual as necessary to perform our Services or for your employment. If you wish to limit our use or disclosure of your Sensitive Personal Information, please click this link: “Limit the Use of My Sensitive Information” and we will process your request.

Consumers under 16 years of age. We will not sell or share Personal Information of users if we have actual knowledge that the user is less than 16 years of age, unless the user, in the case of user at least 13 years of age and less than 16 years of age, or the user’s parent or guardian, in the case of users who are less than 13 years of age, has affirmatively authorized the sale or sharing of the user’s Personal Information.

Exercising Your Rights. If you’re a California resident, employee or contactor and desire to exercise your data protection rights, please contact us at info@northgateresorts.com. With the exception of your right to opt-out of the sale or sharing of your Personal Information for which we do not need to verify your identity, you may be required to provide additional information necessary to confirm your identity before we can respond to your request, and we will use that information only for that purpose. We may request that you submit a signed statement under penalty of perjury that you are the individual you claim to be. We will acknowledge receipt of your request within 10 days from receipt of such request and will endeavor to respond within 45 days after receipt of your request, but if we require more time (up to an additional 45 days) we will notify you of our need for additional time. For requests that we not sell or share your information, or limit the use of your sensitive Personal Information, we will comply with your request within 15 days after receipt of such request. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm that the Personal Information relates to you. You may make a request for disclosure of our information collection practices, the information we collected about you, or our sharing practices up to twice within a 12-month period. You may make a request that we not sell or share your Personal Information, limit the use of your sensitive Personal Information, or for deletion of your information at any time. For requests for a copy of the Personal Information we have collected during the 12 months prior to your request we will endeavor to provide the information in a format that is readily useable, including by mailing you a paper copy or providing an electronic copy to your e-mail account on file, if you have an email address on file with us. For requests for deletion of your information, please understand that California law permits us to retain certain information and not to delete it under certain circumstances. By way of example, we are not required to comply with a request to delete information if (1) the information is necessary for us to (a) complete a transaction for you or otherwise perform a contract; or (b) detect, protect against, or prosecute security incidents, fraud or illegal activity; (2) we use the information only internally in ways reasonably aligned with your expectations as our customer, and (3) we are required to retain the information to comply with legal obligations. If we receive such a request from you, we will notify any service providers we have engaged and provided your information to delete your information as well.

Using an Authorized Agent. You may submit a request through someone holding a formal ‘Power of Attorney’. Otherwise, you may submit a request using an authorized agent only if (1) the person is registered with the Secretary of State to do business in California, (2) you provide the authorized agent with signed written permission to make a request, (3) you verify directly with us that you have authorized the person to make the request on your behalf, (4) you verify your own identity directly with us, and (5) your agent provides us with proof that they are so authorized. We will require the agent to submit proof to us that they have been authorized to make requests on your behalf.

Categories of Information Collected.

We collect Personal Information for the business purposes described in this Privacy Notice. The CCPA as amended, defines a “Business Purpose” as the use of Personal Information for the business’s operational purposes, or other notified purposes, provided the use of Personal Information is reasonably necessary and proportionate to achieve the operational purpose for which the Personal Information was collected or another operational purpose that is compatible with the context in which the Personal Information was collected. The CCPA defines “Collected” as buying, renting, gathering, obtaining, receiving, or accessing any Personal Information pertaining to a consumer by any means, including receiving information directly or passively from the consumer, or by observing the consumer’s behavior.

We make disclosures for a Business Purpose under written contracts that describe the purposes, require the recipient to keep the Personal Information confidential, and prohibit selling or sharing of Personal Information and using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, Company has disclosed Personal Information for a Business Purpose to the categories of service providers or contractors indicated in the chart below.

This notice supplements our Privacy Notice. To the extent the California Consumer Privacy Act (“CCPA”) is applicable, this Section is only applicable to you if you are a resident of the state of California (“**California Residents**”) and only applies to Personal Information for which Company is a “**Business**” (as defined in CCPA), but does not apply to Personal Information we collect from you where you are an employee, owner, director, officer or contractor of a company, partnership, sole proprietorship, non-profit or government agency. It applies to Personal Information we collect from California Residents on or through our Services and through other means (such as information collected offline or in person). With respect to personal information for which you are a “Business” and Northgate is a “Service Provider,” as defined in the CCPA, please see the applicable Service Agreement or Terms of Service, as the case may be.

Rights and Choices. Under the CCPA and subject to certain limitations and exceptions, if you are a California resident, you may have certain rights with respect to information we have collected about you that constitutes Personal Information under the CCPA as set forth herein. This Privacy Notice describes the Personal Information we collect about you. We collect this information for the purposes described herein and we share this information as described herein.

Exercising Your Rights. If you’re a California resident and desire to exercise your data protection rights, please contact us at info@northgateresorts.com. You may be required to provide additional information necessary to confirm your identity before we can respond to your request, and we will use that information only for that purpose. We may request that you submit a signed statement under penalty of perjury that you are the individual you claim to be. We will acknowledge receipt of your request within 10 days from receipt of such request and will endeavor to respond within 45 days after receipt of your request, but if we require more time (up to an additional 45 days) we will notify you of our need for additional time. For requests that we not sell your information we will comply with your request within 15 days after receipt of such request. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity and confirm that the Personal Information relates to you. You may make a request for disclosure of our information collection practices, the information we collected about you, or our sharing practices up to twice within a 12-month period. You may make a request that we not sell information or for deletion of your information at any time. For requests for a copy of the Personal Information we have collected during the 12 months prior to your request we will endeavor to provide the information in a format that is readily useable, including by mailing you a paper

copy or providing an electronic copy to your e-mail account on file, if you have an email address on file with us. For requests for deletion of your information, please understand that California law permits us to retain certain information and not to delete it under certain circumstances. By way of example, we are not required to comply with a request to delete information if (1) the information is necessary for us to (a) complete a transaction for you or otherwise perform a contract; or (b) detect, protect against, or prosecute security incidents, fraud or illegal activity; (2) we use the information only internally in ways reasonably aligned with your expectations as our customer, and (3) we are required to retain the information to comply with legal obligations. If we receive such a request from you, we will notify any service providers we have engaged and provided your information to delete your information as well.

Amendments

Northgate reserves the right to change the Privacy Policy from time to time as its sole discretion with or without notice. Revisions to the Privacy Policy regarding the use of Personal Information are not retroactive.

European Union Disclosure

Personal Information voluntarily submitted to Northgate online, via electronic communication, or by other means may be stored or accessed on servers located in the United States. The European Union has not deemed the United States to provide an "adequate" level of privacy protection under its data protection laws. If you do not consent to your information being processed and stored in the United States, please do not provide it to Northgate.

Northgate asserts that the General Data Protection Regulation (EU) 2016/679 (GDPR) does not apply to its processing of Personal Information and that it is not subject to the jurisdiction of the EU. All processing of Personal Information is governed by the applicable laws of the United States.

Accessibility

If you are visually impaired, you may access this Privacy Notice through your browser's audio reader.

Changes to This Privacy Notice

We reserve the right to change this Privacy Notice or any agreement you entered into with Campspot time to time. We may notify you of significant changes to this Privacy Notice by sending a notice to the primary email address specified by you or by placing a prominent notice on the Websites and App. Significant changes will go into effect thirty (30) days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Services and this Privacy Notice for updates.

Contact

If you have any questions about the Privacy Policy, or to report a violation of the Terms of Use, please email us at info@northgateholdings.com. Contact us by mail at:

Northgate Resorts
38 Commerce Ave.

Suite 200
Grand Rapids, MI 49503