

PRIVACY POLICY

Effective Date: March 5, 2020.

1. Introduction and Overview.

This Privacy Policy provides a comprehensive description of how (Nordman Lake Associates LLC) aka “**Camp Woodbury on Nordman Lake**,” “we,” “our,” or “us”) collects, uses, and shares information about you as well as your rights and choices regarding such information. It applies to any online location that links to this Privacy Policy and when it is made available to you offline (the “**Service**”).

By using the Service or interacting with us offline, you agree and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy. If you do not agree and consent, discontinue use of the Service.

If you are a California resident or data subject in Europe, please see the “Additional Disclosures for California Residents” and “Additional Disclosures for Data Subjects in Europe” sections.

If you have any questions or wish to exercise your rights and choices, please contact us as set out in the “Contact Us” section.

2. Information Collection.

A. **Information You Provide.**

We collect information about you when you use the Service or interact with us offline, including information you provide when you request event information, or fill out a form on our Service, access our content, or contact our customer support. The categories of information we collect, including collection in the last 12 months, are:

- **Client Contact Data**, including your and/or your company’s name, area of interest, email address, postal address, and phone number.
- **Geographic Data**, Country, State, language.
- **Billing Data**, including payment instrument number (such as a credit or debit card number), expiration date, and security code as necessary to process your payments. Credit card data is not retained for future use.
- **Content**, including content within any messages you send to us (such as feedback and questions to customer support) or publicly post regarding the Service (such as in social media comments, on sites such as Instagram, Pinterest and Facebook).

You may choose to voluntarily provide other information to us that we do not request, and, in such instances, you are solely responsible for such information.

B. Information Collected Automatically.

In addition, we automatically collect information when you use the Service. The categories of information we collect automatically and have collected in the last 12 months, include the following:

- **Service Use Data**, including data about the features you use, pages you visit, emails and advertisements you view, the time of day you browse, and your referring and exiting pages.
- **Device Connectivity and Configuration Data**, including data about the type of device or browser you use, your device's operating software, your internet service provider, your device's regional and language settings, and device identifiers such as IP address and Ad Id (e.g., IDFA or AAID).
- **Location Data**, including imprecise location data (such as location derived from an IP address or data that indicates a city or postal code level).

We use various current – and later – developed tracking technologies to automatically collect information when you use the Service, including the following:

- **Log Files**, are files that record events that occur in connection with your use of the Service.
- **Cookies**, which are small data files stored on your device that act as a unique tag to identify your browser. We use two types of cookies: session cookies and persistent cookies. Session cookies make it easier for you to navigate our website and expire when you close your browser. Persistent cookies help with personalizing your experience, remembering your preferences, and supporting security features. Additionally, persistent cookies allow us to bring you advertising both on and off the Service. Persistent cookies may remain on your device for extended periods of time and may be controlled through your browser settings.
- **Pixels** (also known as web beacons), which is code embedded in a website, video, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, video, email, or advertisement that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels from separate entities that allow us to track our conversions, bring you advertising both on and off the Service, and provide you with additional functionality, such as the ability to connect our Service with your social media account.

For further information on how we use tracking technologies for analytics and advertising, and your rights and choices regarding them, see the “Analytics and Advertising” and “Your Rights and Choices” sections below.

For further information on your rights and choices regarding Client Data, see the “Your Rights and Choices” section below.

C. Information from Other Sources.

We also collect information from other sources. The categories of other sources from which we have collected information, including in the last 12 months, include the following:

- **Social networks** when you engage with our content, reference our Service, or grant us permission to access information from the social networks.
- **Publicly available sources**, including data in the public domain.

3. Use of Information.

We collect and use the categories of information described in this Privacy Policy for business and commercial purposes. The business purposes for which we use information include:

- Operate and manage our Service, including your registration and account.
- Perform services requested by you, such as respond to your comments, questions, and requests, and provide customer service.
- Sending you updates, information regarding changes to our policies, and support and administrative messages.
- Improving the Service or other Camp Woodbury on Nordman Lake websites, apps, marketing efforts, products and services.
- Fulfilling any business or commercial purposes at your direction or with your consent.

Camp Woodbury on Nordman Lake discloses the following categories of personal information for commercial purposes: contact information and identifiers such as cookies, demographic information, service use data, internet or other electronic network activity information such as IP Address, and profile information such as inferences. Our disclosure of this information is more fully described in the “Analytics and Advertising” section below.

Notwithstanding the above, we may use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law. For information on your rights and choices regarding how we use information about you, please see the “Your Rights and Choices” section below.

4. **Sharing of Information.**

We share information we collect in accordance with the practices described in this Privacy Policy. The following are the categories of entities to whom we disclose information, including in the last 12 months:

- **Clients.** We share information with our clients in connection with us processing information on their behalf. For example, we share information with our clients in order to facilitate your orders, maintain and administer your online accounts, respond to your questions and comments, comply with your requests, market and advertise to you, and otherwise comply with applicable law.
- **Public Forums.** We share information you make public through the Service, such as your posts on our public social media sites. Please think carefully before making information public as you are solely responsible for any information you make public. Once you have posted information, you may not be able to edit or delete such information, subject to additional rights set out in the “Your Rights and Choices” section below.
- **Security and Compelled Disclosure.** We share information to comply with the law or other legal process, and where required, in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We also share information to protect the rights, property, life, health, security and safety of us, the Service or anyone else.
- **Consent.** We share information at your request or direction or with your consent.

Camp Woodbury on Nordman Lake does not generally sell information as the term “sell” is traditionally understood. However, to the extent the California Consumer Privacy Act is interpreted to include advertising technology activities such as those disclosed in the “Analytics and Advertising” section as a “sale,” we will comply with applicable law as to such activity. California residents should review the “Additional Disclosures for California Residents” section to learn how to opt out.

Notwithstanding the above, we may share information that does not identify you (including information that has been aggregated or de-identified) except as prohibited by applicable law. For information on your rights and choices regarding how we share information about you, please see the “Your Rights and Choices” section below.

5. **Social Media and Technology Integrations.**

We offer parts of our Service through websites, platforms, and services operated or controlled by separate entities. In addition, we integrate technologies operated or controlled by separate entities into parts of our Service. For example, we hyperlink from our Services to websites, social media platforms, and other services not operated or controlled by us.

Please note that when you interact with other entities, including when you leave our Service, those entities may independently collect information about you and solicit information from you. The information collected and stored by those entities remains subject to their own policies and practices, including what information they share with us, your rights and choices on their services and devices, and whether they store information in the U.S. or elsewhere. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.

6. **Analytics and Advertising.**

We use analytics services, such as Google Analytics, to help us understand how users access and use the Service. In addition, we may work with agencies, advertisers, ad networks, and other technology services to place ads about our products and services on other websites and services.

As part of this process, we may incorporate tracking technologies into our own Service (including our website and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies may track your activities across time and services for purposes of associating the different devices you use and delivering relevant ads and/or other content to you (“**Interest-based Advertising**”).

For further information on the types of tracking technologies we use on the Service and your rights and choices regarding analytics, Interest-based Advertising, please see the “Information Collected Automatically” and “Your Rights and Choices” sections.

7. **Your Rights and Choices.**

A. **Account Information.**

You may access, update, or remove certain information that you have provided to us through your account by visiting your account settings or sending an email to the email address set out in the “Contact Us” section below. We may require additional information from you to allow us to confirm your identity. Please note that we will retain and use information about you as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

B. **Tracking Technology Choices.**

- **Cookies and Pixels.** Most browsers accept cookies by default. You can instruct your browser, by changing its settings, to decline or delete cookies. If you use multiple browsers on your device, you will need to instruct each browser separately. Your ability to limit cookies is subject to your browser settings and limitations.
- **Do Not Track.** Your browser settings may allow you to automatically transmit a “Do Not Track” signal to online services you visit. Note, however, there is no industry consensus as to what site and app operators should do with regard to these signals. Accordingly, unless and until the law is interpreted to require us to do so, we do not monitor or take action with respect to “Do Not Track” signals. For more information on “Do Not Track,” visit <http://www.allaboutdnt.com>.

Please be aware that if you disable or remove tracking technologies some parts of the Service may not function correctly.

C. Analytics and Interest-Based Advertising.

Google provides tools to allow you to opt out of the use of certain information collected by Google Analytics at <https://tools.google.com/dlpage/gaoptout> and by Google Analytics for Display Advertising or the Google Display Network at <https://www.google.com/settings/ads/onweb/>.

The companies we work with to provide you with targeted ads are required by us to give you the choice to opt out of receiving targeted ads. Most of these companies are participants of the Digital Advertising Alliance (“DAA”) and/or the Network Advertising Initiative (“NAI”). To learn more about the targeted ads provided by these companies, and how to opt out of receiving certain targeted ads from them, please visit: (i) for website targeted ads from DAA participants, <https://www.aboutads.info/choices>; (ii) for app targeted ads from DAA participants, <https://www.aboutads.info/appchoices>; and (iii) for targeted ads from NAI participants, <https://www.networkadvertising.org/choices/>. Opting out only means that the selected participants should no longer deliver certain targeted ads to you, but does not mean you will no longer receive any targeted content and/or ads (e.g., in connection with the participants’ other customers or from other technology services).

You may also limit our use of information collected from or about your mobile device for purposes of serving targeted ads to you by going to your device settings and selecting “Limit Ad Tracking” (for iOS devices) or “Opt out of Interest-Based Ads” (for Android devices).

Please note that if you opt out using any of these methods, the opt out will only apply to the specific browser or device from which you opt out. We are not responsible for the effectiveness of, or compliance with, any opt out options or programs, or the accuracy of any other entities’ statements regarding their opt out options or programs.

8. Children.

The Service is intended for a general audience and is not directed at children under (13) years.

We do not knowingly gather personal information (as defined by the U.S. Children’s Privacy Protection Act, or “COPPA”) in a manner not permitted by COPPA. If you are a parent or guardian and you believe we have collected information from your child in a manner not permitted by law, contact us at the email address in the “Contact Us” section below. We will remove the data to the extent required by applicable laws.

In California, we do not knowingly “sell” the personal information of minors under 16 years old.

If you are a California resident under 18 years old and you have registered with a Service, you can ask us to remove content or information you have posted to a Service. Email us at the email address

under the “Contact Us” section below with “California Under 18 Content Removal Request” in the subject line and tell us what you want removed.

9. Data Security.

We implement and maintain reasonable administrative, physical, and technical security safeguards to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of information about you.

10. International Transfer.

We are based in the U.S. and the information we collect is governed by U.S. law. If you are accessing the Service from outside of the U.S., please be aware that information collected through the Service may be transferred to, processed, stored, and used in the U.S. and other jurisdictions. Data protection laws in the U.S. and other jurisdictions may be different from those of your country of residence. Your use of the Service or provision of any information therefore constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of information about you in the U.S. and other jurisdictions as set out in this Privacy Policy.

11. Changes to this Privacy Policy.

We reserve the right to revise and reissue this Privacy Policy at any time. Any changes will be effective immediately upon posting of the revised Privacy Policy. Your continued use of our Service indicates your consent to the Privacy Policy then posted. If the changes are material, we may provide you additional notice to your email address.

12. Contact Us.

If you have any questions or comments about this Privacy Policy, our data practices, or our compliance with applicable law, please contact us:

By email:

TOM@CAMPWOODBURY.COM

By mail:

Camp Woodbury on Nordman Lake
1991 N Steinbach Rd
Dexter, MI 48130

If you have a disability and would like to access this Privacy Policy in an alternative format, please contact us at TOM@CAMPWOODBURY.COM or 734-604-6439.

13. Additional Disclosures for California Residents.

A. Roles.

Our Service is intended to provide information to our prospective and current guests. You understand and agree that information collected about you is solely within the context of (i) your role as an employee, guest, or contractor or (ii) Camp Woodbury on Nordman Lake conducting due diligence regarding or providing or receiving a product or service to or from your employer.

If you are a California resident and we as a service provider have processed personal information about you on behalf of our clients and you wish to exercise your CCPA rights, please inquire with your direct provider such as Camp Woodbury on Nordman Lake or Airbnb. We will support you to the extent required by California privacy law in responding to your request.

B. Do Not Sell My Personal Information.

To the extent Camp Woodbury on Nordman Lake sells your personal information as the term “sell” is defined under the California Consumer Privacy Act, you have the right to opt-out of the sale of your personal information by us to third parties at any time. You may submit a request to opt-out by calling Tom at 734-604-6439 or emailing us at TOM@CAMPWOODBURY.COM

C. Authorized Agent.

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent’s permission to do so and verification of your identity.

D. Right to Non-Discrimination.

You have the right not to receive discriminatory treatment by us for the exercise of any your rights.

E. Shine the Light.

If you are a resident of California, you may request (i) a list of the categories of personal information disclosed by us to third parties during the immediately preceding calendar year for those third parties’ own direct marketing purposes; and (ii) a list of the categories of third parties to whom we disclosed such information. To exercise a request, please write us at the email or postal address set out in “Contact Us” above and specify that you are making a “California Shine the Light” request. We may require additional information from you to allow us to verify your identity and are only required to respond to such requests once during any calendar year.

14. Additional Disclosures for Data Subjects in Europe.

A. Roles.

Data protection laws in Europe distinguish between organizations that process personal data for their own purposes (known as “controllers”) and organizations that process personal data on behalf of other organizations (known as “processors”).

Camp Woodbury on Nordman Lake acts as a controller with respect to personal data collected as you interact with our websites, emails, and advertisements. Any questions that you may have relating to the processing of personal data by Camp Woodbury on Nordman Lake and your rights under data protection law should be directed to TOM@CAMPWOODBURY.COM

B. Lawful Basis for Processing.

Data protection laws in Europe require a “lawful basis” for processing personal data. Our lawful bases include where: (a) you have given consent to the processing for one or more specific purposes, either to us or to our service providers; (b) processing is necessary for the performance of a contract with you; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.

C. Your Data Subject Rights.

If you are a data subject in Europe, you have the right to access, rectify, or erase any personal data we have collected about you. You also have the right to data portability and the right to restrict or object to our processing of personal data we have collected about you. In addition, you have the right to ask us not to process your personal data (or provide it to third parties to process) for marketing purposes or purposes materially different than for which it was originally collected or subsequently authorized by you. You may withdraw your consent at any time for any data processing we do based on consent you have provided to us.

Please note that we retain information as necessary to fulfil the purposes for which it was collected, and may continue to retain and use information even after a data subject request for purposes of our legitimate interests, including as necessary to comply with our legal obligations, resolve disputes, prevent fraud, and enforce our agreements.

D. Complaints.

If you have a complaint about our use of your personal data or response to your requests regarding your personal data, you may submit a complaint to the data protection regulator in your jurisdiction. We would, however, appreciate the opportunity to address your concerns before you approach a data protection regulator, and would welcome you directing an inquiry first to us.