

Privacy & Cookie Policy

At AP resale we are committed to protecting and respecting your privacy.

Please read the privacy Policy carefully as it explains who we are, when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure. The Policy also explains your rights in relation to your personal information and how to contact supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to data protection laws and we are responsible as "controller" of that personal information for the purposes of those laws.

General Data Protection Regulation ("GDPR").

The **GDPR** is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

We collect your email address in order to:

- Send information, respond to inquiries, and/or other requests or questions
- Market to our mailing list or continue to send emails to our clients after the original transaction has occurred.

To be in accordance with GDPR, we agree to the following:

- Not use false or misleading subjects or email addresses.
- Identify the message as an advertisement in some reasonable way.
- Include the physical address of our business or site headquarters.
- Monitor third-party email marketing services for compliance, if one is used.
- Honor opt-out/unsubscribe requests quickly.
- Allow users to unsubscribe by using the link at the bottom of each email.

Our Commitment

APresale (*'we' or 'us' or 'our'*) are committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection program in place which complies with existing law and abides by the data protection principles. However, we recognize our obligations in updating and expanding this program to meet the demands of the GDPR compliance

We are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the new Regulation. Our preparation and objectives for GDPR compliance have been

summarized in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

Who are we?

We are APresale co. Ltd registered in Thailand with company number 0835563000314, having its registered office at No11/14, Maikhao Plaza village No 3 Maikhao Thalang Phuket 83110.

We trade and are a full service timeshare resale company.

You can contact us about how we handle your personal information by email to info@apresale.com or in writing to:

APresale
No11/14 Maikhao Plaza Village No3
Maikhao Talang
Phuket 83110
Thailand

How do we collect information about you?

We collect personal information that you choose to provide:

- When you make an enquiry online through our website, by email or by phone;
- If you contact our company about a general timeshare ownership/membership resale related enquiry or about purchasing, selling or renting a timeshare ownership/membership we will only ever ask you for the data required to perform these obligations;
- Through your use of our website, www.apresale.com you may provide us with personal information such as your name, contact details and nature of your enquiry and questions about your enquiry.
- Signup for our newsletter

What type of information is collected from you?

We receive and store any information you enter on our Websites or give us in any other way, such as via telephone, electronic mail, online or otherwise. For example, this information may be collected when you contact us for customer support.

Here are the types of information we gather:

Contact Information: We collect and retain personal contact information that you submit to us voluntarily and this includes, but is not limited to, your name, mailing address, web address, telephone number, and e-mail address. This information may include your full name, mailing address, phone number, email address, and, where provided, your fax number. Such contact information may be used, for example, to communicate with you when necessary with respect to transactions. Additionally, we may collect contact information provided to us during any correspondence relating to customer support, as well as in connection with products and services offered on our Websites.

Financial Information: We collect and retain certain financial information from when you purchase our products and services. For example, when you sign up for any other product or service through AP resale, we require you to provide a credit card number and billing address before we will process that application. We will not sell, share or rent any financial information collected from you except as disclosed in this Privacy Policy or as necessary to fulfil any order for our products or services.

Demographic Information: We may collect and store anonymous demographic information (such as your postcode, gender and age), and use this data to tailor your experience on our Websites, provide content that we think you might be interested in, perform general improvements to the Websites, and display the content according to your preferences. Such demographic information may be shared with partners, market researchers and other third parties on an aggregate, non-personally identifiable basis. No personally identifiable information will be linked to such aggregated demographic information that is shared with third parties.

Other Information: We collect and store certain types of information whenever you interact with us. For example, our servers track the type of web browser you are using and the page from which you link. Additionally, we log IP addresses (a unique number assigned to every computer on the Internet) in order to improve security, analyse trends and administer the Websites. We may track your movement within the Websites, the third-party website pages from which you were referred, access times and browser types. We use this information to gauge the effectiveness of our Websites, track information for statistical purposes and to improve the products and services we provide. We collect this information to better develop a sense of what services our customers need and identify areas of improvement to the Websites. We may use such information for marketing purposes, and to send information to you that we believe might be of interest. In addition, such information may be shared with partners, market researchers and other third parties on an aggregate, non-personally identifiable basis. No personally identifiable information will be linked to such aggregated information shared with third parties.

We may supplement the information you provide us by acquiring publicly or commercially available information as available in the public domain or from third parties, for instance, to verify your address or to update your information and to create a profile of your preferences. We tie your personally identifiable information to information in the profile, in order to improve the content of the Websites for you or to inform you about products or services that we think will be of interest to you. From time to time, we may also ask you to participate in surveys or other communications conducted by us or third parties designed to help us improve the Websites or the products or services we provide.

How is your information used?

Under data protection law, we can only use your personal information if we have a proper reason for doing so. In order to use your personal information, we rely on the following legal bases:

- **Consent** - You have given consent to the processing of your data for one or more specific purposes.
- **Contract** - Processing is necessary for the performance of your initial enquiry and any contract/agreement that you enter into with our company.

- Legal obligation - Processing is necessary for our compliance with a legal obligation to which we are subject to provide our services to you.
- Legitimate interests - Processing is necessary for the purpose of the legitimate business purposes pursued by us, for example:
 - Updating you in relation to your initial enquiry.
 - Allowing us to manage and fulfil your enquiry and answer your questions relating to the enquiry you have made.
 - Directly marketing to you information about services we provide that maybe of interest to you. Send you communications which you have requested or that we think may be of interest to you. This may include offers we have available or special events and information.

We may use your information to:

- process the legal transfer of ownership on your behalf for the purchase & sale (resale) of a timeshare ownership/membership relating to a contract/agreement you have entered into with us.
- process a booking or reservation for you if you have rented a timeshare ownership/membership through our company.
- make any special requests you have made to our company to allow us to perform our obligations arising from any contracts/agreements entered into by you and us
- ask you for your views or comments on the services we provide.
- notify you of changes to our services.
- to record your interactions with us in order to perform our obligations arising from your initial enquiry and being able to answer your questions and to perform our obligation arising from any contracts/agreements entered into by you and us.

If you do not provide personal information we ask for, it could delay or prevent us from providing the services you have requested to you.

How do we protect your information?

Our website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible. We use regular Malware Scanning.

- Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems, and are required to keep the information confidential. In addition, all sensitive/credit information you supply is encrypted via Secure Socket Layer (SSL) technology.
- We implement a variety of security measures when a user enters, submits, or accesses their information to maintain the safety of your personal information.

- All transactions are processed through a gateway provider and are not stored or processed on our servers.

How long will your personal information be kept?

- We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our legal obligations (e.g. financial record keeping).
- We will hold your personal information on our systems only for as long as is necessary for the relevant obligation to be performed, or as long as is set out in any relevant contract/agreement you hold with us. In any case, unless legally required, we will not hold your personal information for any more than 4 years.

Who has access to your information?

We routinely share your personal information with:

- **Third Party Service Providers working on our behalf:** we may pass your information to our third party service providers, agents, subcontractors and other associated organizations for the purposes of providing services to you on our behalf (for example to provide translation services, accountancy practice who are required to see copies of our financial records and or contracts and agreements. We share details for the purpose of completing purchase and sale agreements with our escrow/stakeholder. However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we ensure appropriate safeguards are in place that require them to keep your information secure, in accordance with data protection laws, and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond our approved suppliers, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.
- **Third Party Data Processors working on our behalf:** we use software providers to process your personal information on our behalf. When we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we ensure appropriate safeguards are in place that requires them to keep your information secure, in accordance with data protection laws. Where we use a Third Party Data Processor we will ensure they uphold the same level of confidentiality and security that we maintain when handling your information, in accordance with data protection laws.
- **Law Enforcement/Regulatory Bodies:** we may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.
- **Other Parties:** we may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymized but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.
- **We will not share your personal information with any other third party.**

Your rights

Under data protection laws, you have the following rights, which you can exercise free of charge.

- The accuracy of your information is important to us. You have the right to require us to correct any mistakes in your personal information we hold. If any of the information we hold about you is inaccurate or out of date, please let us know. You can contact us by email to info@apresale.com or in writing to:

APresale
No11/14 Maikhao Plaza Village No3
Maikhao Talang
Phuket 83110
Thailand

- You have the right to ask for a copy of the information APresale co.Ltd holds about you.
- You have the right to require us to delete your personal information, in certain situations.
- You have the right to receive a copy of all personal information we hold about you in a structured format.
- You have the right to object at any time to our processing of your personal information for direct marketing (including profiling) and in certain other situations (e.g. processing carried out for the purpose of our legitimate interests). You can change your marketing preferences at any time. If you do not want to receive direct marketing communications from us please follow the unsubscribe link on our communications or contact us.
- APresale co.Ltd does not make any automated decisions based on information we hold about you.
- You have the right to request we restrict the processing of your personal information for certain purposes only (e.g. if you contest the accuracy of the data).
- For further information on each of those rights, including the circumstances in which they apply, please contact us.
- If you think we have not handled your personal information correctly you have the right to lodge a complaint with the Information Commissioner's Office who act as the Supervisory Authority for enforcement of relevant data protection legislation in the UK. More information about how to make a complaint can be found at: <https://ico.org.uk/concerns/>
- You have the right to expect us to carry out any request with respect to any of your rights under data protection laws within 30 days where the request is not manifestly unfounded or excessive.
- Security precautions are in place to protect the loss, misuse or alteration of your Personal Information

- When you give us personal information, we take steps to ensure that it is treated confidentially and held securely.
- Once we have collected your information, we make our best effort to ensure its security on our systems and in physical form. Where data is stored electronically we take steps to ensure your information is accessed only by those who need it to administer your enquiry or contract/agreement that you and we may enter into. Your personal data is always encrypted when being sent between our systems, this is shown by the lock icon in your web browser. Where possible your personal data is also encrypted at rest. Where we are storing information about you in physical paper format, this is stored securely and access restricted to only those who need it to administer your enquiry or any contract/agreement that you and we may enter into.
- Credit or debit card details are encrypted and protected by our card payment provider. Any card details you may supply are processed using a secure server and fully encrypted.

Changes to this Privacy Notice

We may change this Privacy Notice at any time to ensure it always accurately reflects the way we collect, use and safeguard your Personal Information.

Please check this notice from time to time to ensure you are aware of any updates we may have made to our Personal Data handling practices. The date of the changes will be listed in the 'Last updated' section below. We will endeavour to notify all of our current clients of any updates to this notice via email and we will post the relevant announcement on our website homepage.

We recommend that you print a copy of this page for your reference.

This Policy was last updated in May 2018

Use of 'cookies'

Our websites use cookies. 'Cookies' are small pieces of information sent by an organization to your computer and stored on your hard drive to allow that website to recognize you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our websites.

What types of cookies are used on this site?

Site Analytics - We use Google Analytics to help analyze use of our website. This analytical tool uses 'cookies', which are text files placed on your computer, to collect standard internet log information and visitor behavior information in an anonymous form. The information generated by the cookie about your use of the website (including your IP address) is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>

Social Sharing - This is a cookie that identifies you with social networking sites such as Facebook and Twitter and allows interaction between your activity on social networking sites and on our website through your direction, and makes your transition between the sites more seamless.

How do I disable/enable cookies?

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

There are a number of ways to manage cookies. Please refer to your browser instructions or help screen to learn more about these functions. For example, in Internet Explorer, you can go to the Tools/Internet options/Security and Privacy Tabs to adapt the browser to your expectations. If you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

Some modern browsers have a feature that will analyze website privacy policies and allow a user to control their privacy needs. These are known as 'P3P' features (Privacy Preferences Platform).

You can easily delete any cookies that have been installed in the cookie folder of your browser. For example, if you are using Microsoft Windows Explorer:

1. open 'Windows Explorer'
2. click on the 'Search' button on the tool bar
3. type "cookie" into the search box for 'Folders and Files'
4. select 'My Computer' in the 'Look In' box
5. click 'Search Now' Double click on the folders that are found
6. 'Select' any cookie file
7. hit the 'Delete' button on your keyboard

If you are not using Microsoft Windows Explorer, then you should select 'cookies' in the 'Help' function for information on where to find your cookie folder.

Links to other websites

Our website may contain links to other websites. This Policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site

Third-party disclosure

We do not sell, trade, or otherwise transfer to outside parties your Personally Identifiable Information.

Third-party links

Occasionally, at our discretion, we may include or offer third-party products or services on our website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

Google

Google's advertising requirements can be summed up by Google's Advertising Principles. They are put in place to provide a positive experience for users. [...read more](#)

- We use Google Tracking Script on our website.

Google, as a third-party vendor, uses cookies to serve ads on our site. Google's use of the DART cookie enables it to serve ads to our users based on previous visits to our site and other sites on the Internet. Users may opt-out of the use of the DART cookie by visiting the Google Ad and Content Network privacy policy. **We have implemented the following:**

- Remarketing with Google AdSense
- Google Display Network Impression Reporting
- Demographics and Interests Reporting
- DoubleClick Platform Integration

We, along with third-party vendors such as Google use first-party cookies (such as the Google Analytics cookies) and third-party cookies (such as the DoubleClick cookie) or other third-party identifiers together to compile data regarding user interactions with ad impressions and other ad service functions as they relate to our website.

Opting out:

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add on.

Online Privacy Protection

Users can visit our site anonymously. Once this privacy policy is created, we will add a link to it on our home page or as a minimum, on the first significant page after entering our website. Our Privacy Policy link includes the word 'Privacy' and can easily be found on the page specified above. You will be notified of any Privacy Policy changes:

- On our Privacy Policy Page

You can change your personal information:

- By emailing us

How does our site handle Do Not Track signals?

We honor Do Not Track signals and Do Not Track, plant cookies, or use advertising when a Do Not Track (DNT) browser mechanism is in place.

Does our site allow third-party behavioral tracking?

It's also important to note that we do not allow third-party behavioral tracking **If at any time you would like to unsubscribe from receiving future emails**

- Follow the instructions at the bottom of each marketing email and we will promptly remove you from **ALL** correspondence.

Contacting Us

If there are any questions regarding this privacy policy, please contact us.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, we will require your parent/guardian's permission beforehand whenever you provide us with personal information.