



For discerning travelers who have everything but time.

Privacy Policy

Aielli – Benevento LLC

(aka 'A&B Private Client Travel', 'A&B Private Client Italy', 'A&B Private Client Services')

Ambassador Style Travel & Private Concierge Class

Aielli – Benevento LLC (aka 'A&B Private Client Travel', 'A&B Private Client Italy', 'A&B Private Client Services'; and Private Concierge Club™) ("A&B", "us", "we", or "our"), operates the website www.ab-travelconciierge.net. We may change or add to this privacy notice, so we encourage you to come back and read it periodically. Aielli – Benevento LLC is the data controller that resides at 503 Summers Court, Alexandria, VA 22301 in the United States.

This privacy notice governs the website www.ab-travelconciierge.net and informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data. This privacy notice only covers information collected through this site and via direct communications between you and Aielli – Benevento LLC . It does not cover any information collected at any other website, application or other communication methods such as when you call us, write us, or in any other manner. Your privacy is very important to us.

Data We Collect

While using our site, we may ask you to provide us with certain personal data that can be used to contact or identify you ("Personal Data"). Personal Data may include, but is not limited to:

- Full name, nickname, alias name
- Job title, areas of expertise, employer
- Address, state, province, zip/postal code, city, country
- Phone number, fax number
- Email address, Twitter, LinkedIn
- Photos, bio, event attendance
- Pictures you submit

Information Collected Automatically

Like many websites, we and our third-party service providers, such as advertising and analytics providers, use cookies, web beacons and other data technologies to receive and store certain types of information when you interact with us through your computer or mobile device. Using these technologies helps us recognize you, customize your experience and make relevant marketing messages. Here are some of the types of information we collect:

Log & Device data. When you visit our site, we may automatically record information ("log data"), including information that your browser sends whenever you visit our site. This log data may include your web address you came from or are going to, your device model, operating system, browser type, unique device identifier, IP address, mobile network carrier, and time zone or location.



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Our third party service providers may provide us information that tells us how our marketing ads, often placed on third-party sites, performed and who clicked on them. This information does not identify any specific individual and is generally non-identifying. If we were to associate it with you, we would treat it as personal data.

Cookie data. We may use “cookies” (a small text file sent by your computer each time you visit our site) or similar technologies to record log data. Many browsers default to accepting cookies. You may be able to change this setting in your browser and you can also clear your cookies. If you do, you may lose some functionality of our site. Check your browser’s help function to learn more about your cookie setting options.

We may use the following types of cookies:

Advertising and Analytics cookies: These cookies collect information about who is visiting our site and how users engage with our site. This information does not identify any individual user. It is aggregated and anonymous. Information included in this analysis is number of visitors to our site, referring websites, pages visited while on this site, time of day visited our site, if this is a new or repeat visitor, and other comparable information. This information is used to help us understand the usage of our site, improve and operate our services more efficiently and to monitor the activity on our site. Please see below for a listing of our analytics providers.

Essential cookies: These cookies help run our site and make your experience better. These include cookies that allow you access to a members-only part of the site or help the content of our site load quickly. These cookies are only used to provide you with these services.

Functionality cookies: These cookies allow the site to remember preferences you have selected such as login details or other selections you may have made. These are designed to make it easier to use our site and not have to set the same preferences every time.

Social Media cookies: We use social media tools on our site and these cookies allow the social media network to record when you have liked or engaged with a social media tool on our site. In some situations, the social network may send us data that you have set to share. If you do not want the social media network to share information with us, please check your privacy settings with the social media network.

Advertising cookies:

These cookies allow you to track browsing habits as you visit the site. Based on your browsing history and with our permission, we use third-party advertising partners who can then display to you a relevant ad when you are on a third party site such as a social media platform. Within these cookies, we may also know your precise location such as latitude, longitude, GeoIP, and other location-specific information. Please see below for your choices on cookies in the use of advertising.

To help us make e-mails more useful and interesting, we often receive a confirmation when you open an e-mail from us if your computer supports such capabilities. You can opt out of receiving emails from us. Please see the Your Choices section below.



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We might also use a pixel tag, which is a small graphic file that allows us and third parties to monitor the use of the site and provide us with information based on your interaction with the site. These tags may collect the IP address from the device which you loaded the page, the browser type. Pixel tags are also used by our third parties to collect information when you visit our site, the links and other actions you take on our site, and we may use this information in combination with cookies to display targeted advertisements.

Other data technologies may be used that collect comparable information for security and fraud detection purposes. If you have any questions about cookies you can go to www.youronlinechoices.com/uk.

How We Use Your Information

We may use information that we collect about you to:

Provide our Programs and Services. We will use your information to provide our products and services to you.

Understand and improve our Programs and Services.

We will perform research and analysis about your use of, or interest in, our programs, networking events, products, services, content or content offered by others. We do this to help make our programs and services better and to develop new programs and services.

Communicate with you. We may send you emails about training programs and events, articles, and other services and news about us or on topics relevant to training or services you purchased or that you opted in to receive. You may opt out of these at any time. Visit the Your Choices section below.

Responding to your requests.

We will also use your information to respond to your questions or comments. We may contact you to inform you about changes in our services, our service offerings and other important service-related notices such as changes to the privacy policy or about security or fraud notices. We may develop and display content and advertising tailored to your interests on our programs and services on our site and on other sites.

We also may use your information to manage our business, to comply with legal or regulatory obligations, or perform functions as otherwise described to you at the time of collection. Use of your information – Grounds for Using Your Personal Data

As stated above, the information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition, Aielli – Benevento LLC is relying on the following lawful grounds to collect and process any personal data you may have provided:

Legitimate Business Interests: To provide you with the information requested from us relating to our services and to provide information on other services which we feel may be of interest to you if you have consented to receive such information, which is legitimate business interests. To notify you about any changes to our website, such as improvements or service changes, that may affect our service. If you are



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an existing customer, we may contact you with information about services similar to those provided to you by us in the past.

Performance of Contract: To meet our contractual commitments to you and in the performance of any contractual obligations to you.

User Consent: We may use your data so that you can be provided with information about services that may be of interest to you. We may contact you about these services by any of the methods that you consented to at the time your information was collected. If you are a new customer, we will only contact you when you have provided consent and only by those means you provided consent for.

Sharing and Disclosure

We do not share your personal information with others except as indicated within this policy or when we inform you and give you an opportunity to opt out of having your personal information shared. We do not sell your information to other organizations. We may share your information in the following ways.

With third-party service providers, agents, or contractors. We use other companies, agents or contractors (“Service Providers”) to perform services on our behalf or to assist us with providing services to you. For example, we may engage Service Providers to process credit card transactions or other payment methods. Or, we may engage Service Providers to provide services such as marketing, advertising, communications, infrastructure and IT services, to provide customer service, to collect debts, and to analyze and enhance data (including data about users’ interactions with our service). These Service Providers may have access to your personal or other information in order to provide these functions. In addition, some of the information we request may be collected by third-party providers on our behalf. We do not authorize them to use or disclose your personal information except in connection with providing their services.

Analytics: Specifically for analytics providers, we use Google Analytics, which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <http://www.google.com/intl/en/policies/privacy/>

Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.



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Advertising: We may use third-party Service Providers to show advertisements, which may include targeted advertisements on a third party site after you have visited our website. We and the third party service providers use cookies to inform, optimize, measure performance, and serve ads based on your previous visits to our site. Any tracking that a third party performs is subject to their own privacy notice. Please note at this time, we do not recognize automated browser signals regarding tracking mechanisms, which may include “do not track” instructions.

Google AdWords: Google AdWords remarketing service is provided by Google Inc. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <http://www.google.com/settings/ads> For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page at <http://www.google.com/intl/en/policies/privacy/>

Twitter: You can opt-out from Twitter’s interest-based ads by following their instructions: <https://support.twitter.com/articles/20170405>. You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

Facebook: You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>

To opt-out from Facebook’s interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/56813749330221>

To see more about Facebook’s participation in the Digital Advertising Alliance please visit the Choices section of this notice.

For more information on the privacy practices of Facebook, please visit Facebook’s Data Policy: <https://www.facebook.com/privacy/explanation>

For more information on the privacy practices of LinkedIn, please visit LinkedIn’s Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

We may participate in Facebook.com’s Custom Audience or LinkedIn’s Audience program which enables us to display personalized ads to persons on our email list when they visit Facebook or LinkedIn, respectively. We provide Personal Information such as your email address and phone number to the social media provider to enable it to determine if you are a registered account holder. You may opt-out of participation in this program by contacting us as noted below. You may also opt out of receiving these ads from the social media network directly.

To comply with legal process or to protect Aielli – Benevento LLC . If we believe that disclosure is reasonably necessary to comply with a law, regulation, legal or governmental request; to enforce applicable terms of use, including investigation of potential violations thereof; to protect the safety, rights, or property of the public, any person, or Aielli – Benevento LLC as required by law; or to detect, prevent, or otherwise address, security or technical issues or illegal or suspected illegal activities (including fraud).

Business Transfers. We may engage in a merger, acquisition, bankruptcy, dissolution, reorganization, or similar transaction or proceeding that involves the transfer of the information described in this Policy. In



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such transitions, customer information is typically one of the business assets that is transferred or acquired by a third party. In the unlikely event that we or substantially all of our assets are acquired or enter a court proceeding, you acknowledge that such transfers may occur and that your personal information can continue to be used as set forth in this privacy policy.

Links to Other Sites

We may have links on our site to other sites that we do not operate. If you click on a third party link, you will be taken directly to that site which is governed by its own privacy notice. We strongly encourage you to read that privacy notice. We do not control that site and assume no responsibility for the content, policies or its practices.

Retention

Aielli – Benevento LLC will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Notice. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Aielli – Benevento LLC will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Choices and Individual Rights

We aim to take reasonable steps so you can correct, amend, delete or limit the use of your Personal Data.

We outline your choices below:

E-mail. As described above, if you do not wish to receive promotional e-mails from us, you may opt-out at any time. If you opt out of a promotional e-mail, we may still send you transactional and administrative emails about this privacy notice or about the products or services you have purchased. Your browser's help function should contain instructions on how to set your computer to accept all cookies, to notify you when a cookie is issued, or to not receive cookies at any time.

You can opt out of online targeted advertising by opting out within the advertisement itself or by visiting Digital Advertising Alliance, <http://www.aboutads.info/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>. You can also opt out of the Digital Advertising Alliance using your mobile device settings.

Your rights under certain circumstances. To initiate any of these actions please contact us at info@ab-travelconcierge.net.

To access and receive a copy of the Personal Data we hold about you

To rectify any Personal Data held about you that is inaccurate

To request the deletion of Personal Data held about you



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You have the right to data portability for the information you have provided to us. You can request to obtain a copy of this information in a commonly used electronic format so that you can manage and move it. We will need to verify your identity before being able to respond to such requests.

Please note that in some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Right to Lodge a Complaint. For European Union residents, if you feel that our processing of your personal data infringes on data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state where you habitually reside, your place of work or the location of the alleged infringement. If you are located outside of the European Union, you may have rights under privacy laws in the jurisdiction where you live.

Transfer of Data

This site is operated in the United States. If you are located in another jurisdiction, please know that your information will be transferred to, stored, and processed in the United States. By using this site and providing us with information, you consent to this transfer, processing, and storage of your information in the United States. It is important to note that the privacy laws in the United States may not be as comprehensive as those in other countries such as the European Union. Our service providers use appropriate safeguards to transfer your personal data to the United States.

Security

We use reasonable administrative, logical, physical and managerial measures to safeguard your personal information against loss, theft and unauthorized access, use and modification. Unfortunately, no measures can be guaranteed to provide 100% security. Accordingly, we cannot guarantee the security of your information.

Sensitive Data

We request that you do not send us any sensitive data such as social security or national identification numbers, information related to racial or ethnic origin, political opinions, religious beliefs, health data, biometrics or genetic, criminal background or trade union membership information. If you do send us this information, then you are consenting to its processing in accordance with this privacy notice. To avoid processing of sensitive data, do not submit it.

Our Policy on Children's Information: Our site is not directed to children under 16. If you learn that your minor child has provided us with personal information without your consent, please contact us.

Changes to the Policy: We may change this policy from time to time, and if we do we'll post any changes on this page. If you continue to visit our site after those changes are in effect, you agree to the revised policy. If the changes are significant, we may provide more prominent notice or get your consent on the new policy.

Contacting Us

If you have any questions or comments about this policy, please contact us at info@ab-travelconcierge.net. or +1.833.434.1234.