

INTRODUCTION

Management Group Investors, LLC, and its subsidiaries, Airport Shoppes, Corp., Airport Aviation Services, Inc., Carolina Catering Corporation, and Cargo Service Corporation (“we”, “us” or “our”) are committed to protecting your privacy. This statement describes the information we collect, our use of the same, and your options regarding our use of it. This statement also presents the steps we take to protect and how you can review and correct your personal information. This privacy statement refers to personal information that can be associated with a specific person and used to identify that person. Personal information does not include information that has been de-identified so that it does not identify a specific user, which may be used for any legal purpose.

YOUR CONSENT TO THIS PRIVACY STATEMENT

By accessing or otherwise using our Site or Services, you are consenting to the information collection and use practices described in this privacy statement. If you are using the Site or Services on behalf of a company or other legal entity, you hereby represent and warrant that you have the authority to consent to this privacy statement (and the Terms of Service applicable to the Site and Services) on behalf of the company or other legal entity. To the extent this privacy statement conflicts with any existing agreement between the company or other legal entity you represent and any of our affiliates, this privacy statement shall control and supersede such other terms and conditions with regard to the subject matter of this privacy statement. Additionally, if you are using the Site or Services on behalf of a company or other legal entity, you are nevertheless individually bound by this privacy statement even if your company has a separate agreement with us. As used in this privacy statement, “you” and “your” refer to you individually and the company on behalf of which you are entering into this privacy statement.

WHAT KINDS OF INFORMATION DO WE COLLECT?

Depending on how you use the Site, we may collect different kinds of information from or about you:

- **Information you provide:** We collect the content and information you provide when you use the Site, request information or assistance from us, when you post a review or comment of our services or products.
- Your content and information may include "**Personal Information**", which is any information that can be used to identify for you. For example, Personal information can include your:
 - Contact information (name, address, phone number, or email address);
 - Photo or images;
 - Certain data about your use of the Site that is considered Personal Information in some jurisdictions; and
- User comments that you may provide, such as in reviews, testimonials, or comments. Please note that the information you submit in these user comments may be posted publicly on the Site. If you do not want your information to be publicly available, please do not submit reviews, testimonials, or comments.
- **Payment Information:** If you place an order, we will collect the information that we need to process your transaction, such as your name, billing address, shipping address, phone number, and the recipient's information if the order is a gift. We have engaged the following companies to help us process your payment card information securely: Evertec and MultiService. We do not

store any of your financial or credit card information, and the processing companies we use are required to be compliant with the Payment Card Industry Data Security Standard (PCI-DSS).

- **Employment Application Information:** If you apply for employment with us, we will collect your name, work history, and other information relevant to your employment application. We will not use your information for purposes other than evaluating and processing your employment application. We have engaged a company called HRSense to help us process your employment information securely.
- **Information collected automatically:** We collect information about your visit to our sites, including what pages you view, the number of bytes transferred, the links you click, the materials you access, and other actions taken within our sites. On sites that you enter with a user ID, we may connect this information with your identity to determine your potential interests in our products and services. We also collect certain standard information that your browser sends to every website you visit, such as your Internet Protocol (IP) address, your browser type and capabilities and language, your operating system, the date and time you access the Site or Services, and the website from which you linked to our Site or Services. The information we collect automatically is statistical data and may or may not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve and to deliver better and more personalized Services, including by enabling us to:
 - Estimate of our audience size and usage patterns.
 - Store information about your preferences, allowing us to customize our Site and Services according to your individual interests.
 - Speed up your searches.
 - Recognize you when you return to our Site or Services.
- **Information we may collect from other sources.** We may also collect information about you from third parties, including but not limited to third-party verification services, credit bureaus, mailing list providers, and publicly available sources.

HOW DO WE USE THIS INFORMATION?

We reserve the right to use the personal information we collect to deliver services or carry out transactions you have requested, such as providing information on our products and services, processing orders, handling service issues, answering customer service requests, and facilitating the use of our Site or Services, and so forth help provide and support our Sites. We may also use your information to communicate with you and deliver advertising that may be more relevant to you. We will obtain your consent to use your Personal Information for a purpose other than as described in this Privacy Policy and below:

- **Offering, improving and developing the Site:** We use your information to provide and improve the services that we offer, including to operate, maintain and develop Site content, features, and products. We also use your information to analyze our operations and marketing initiatives and develop new services and products in response to your feedback

- **Communicate with you:** We may use your information to send you information about your account, our services and products, marketing communications, and important administrative announcements about the Site or your Account. We also use your information to respond to you when you contact us.
- **Promoting Safety and Security:** We use the information we collect to help verify your identity, your account, and your activity on the Site. We might use this information, for instance, to investigate suspicious activity or violations of our Terms of Use or policies.

We use cookies and other data collection technologies to provide and support the Site and the uses outlined and described in this section of the Privacy Policy. See Cookies and Other Data Collection Technology below to learn more about how we use Data Collection Technology and how to control cookies on your devices.

HOW IS THIS INFORMATION SHARED?

We will only share your Personal Information we disclosed to you at the time we collect it, with your consent, or as stated below:

- **With our service providers:** We work with vendors that help us provide you the Site and related services. Unless prohibited by applicable law, we may share information with our vendors for purposes such as website hosting, professional services, human resources management, processing transactions, advertising, customer service, e-mail delivery, auditing and analyzing our Site and Services. When we share Personal Information with vendors, we provide them with only those elements of your personal information they need to deliver those services and require those vendors to process your Personal Information only on our behalf and for the same purposes for which the Personal Information was collected.
- **With affiliates:** We may share Information within our corporate family for the purposes described in this Privacy Policy and as required or authorized by law. Affiliates are those companies that are under common control of Airport Shoppes, which is the primary data controller for these purposes.
- **As part of individual transactions:** In connection with certain transactions, we may disclose some or all of your personal information to financial institutions, government entities, and shipping companies or postal services involved in fulfillment of orders.
- **As part of a corporation transaction:** Unless prohibited by applicable law, we may share, transfer or delete your Personal Information if we are involved in a merger, sale, acquisition, divestiture, restructuring, reorganization, dissolution, bankruptcy or other change of ownership or control by Airport Shoppes or any affiliated company (in each case, whether in whole or in part). If required by applicable law, any such sharing of information will be reported to regulators in accordance with the applicable law.
- **In other lawful ways:** We may also share your Personal Information: (i) if we determine that disclosure is necessary to comply with the request of a law enforcement, regulatory agency or other legal process; (ii) to protect the rights, privacy, property, interests or safety of our company or our affiliates, customers, business partners, suppliers, employees or the general public; (iii) to pursue available remedies or limit damages; (iv) to enforce our Terms of Use; (v) to respond to an emergency; and (vi) as otherwise permitted by applicable law.
- We will not share your personal information to the following with third party publishers, advertisers or developers.

COOKIES AND OTHER DATA COLLECTION TECHNOLOGY

We use cookies and other data collection technologies to help us provide, protect and improve the Site.

Cookies are small pieces of text used to store information on web browsers. Cookies are used to store and receive identifiers on computers, phones and other devices and they may contain information such as user settings, browsing history and other Internet activities. While the cookies that we use may change from time to time as we improve and update the Site, the types of cookies we use generally fall into the below categories:

- **Session Cookies** are used to operate our Services. Some cookies are essential for the operation of the Services. If a user chooses to disable cookies, certain content and features may not be available.
- **Preference Cookies** are used to remember your preferences. For example, when you select your location on Site, we use cookies to remember your location preferences so you do not have to select it every time you visit the Site.
- **Advertising Cookies** are used to serve you with advertisements that we believe are relevant to you and your interests. These cookies also help us evaluate our marketing program performance and analytics.
- **Security Cookies** are used for general security purposes, such as user authentication and preventing fraudulent use or unauthorized access of data.

To learn more about cookies, visit www.allaboutcookies.org. In this Privacy Policy, we refer to cookies and other similar technology as "**Data Collection Technology**."

Why we use Data Collection Technology: Data Collection Technology helps us to save your password for future log-ins, detect and prevent fraud, and help us (and our ad partners) manage our online marketing program and deliver ads that are relevant or may be of interest to you. Data Collection Technology also helps us personalize and improve the performance of the Site. For example, we use Google Analytics to collect information to improve the Site, such as how often users visit a website, what pages they visit when they do so, and what other website they used prior to visiting the Services. Google Analytics places a cookie on your web browser so that it can identify you the next time you visit the Site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to the Site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

Controlling cookies on your computer: We will notify you when you are on part of the Site that uses cookies. By continuing to use that part of the Site after such notice, you accept the use of cookies. If you do not wish to receive cookies, you may set your browser to reject cookies or alert you when a cookie is dropped on your computer. Usually, these settings are available through the security features of your web browser. Please be aware that if you disable cookies, some features on the Site may not be available.

Our policy on "Do Not Track" signals: California's Online Privacy Protection Act requires website operators to disclose how they respond to web browser's "Do Not Track" ("**DNT**") signals. Some web browsers incorporate a DNT or similar feature that signals to websites that a user does not want to have his or her online activity tracked. Not all browsers offer a DNT option and DNT signals are not

yet uniform. For this reason, many website operators, including us, do not respond to DNT signals.

Opting out of Interest-Based Advertising. Interest-based advertising is a way that helps companies provide you with more relevant advertising on the websites you visit or the applications you use. If you want to "opt out" of receiving online interest-based ads, please follow the instructions at www.aboutads.info/choices, or <http://www.networkadvertising.org/choices/>. Please note that when you "opt-out" of receiving interest-based ads, this does not mean you will no longer see ads from us or on the Site. It means that the online ads that you do see will not be based on your particular interests. If you delete cookies on your device, generally you will need to opt-out again. More information about online behavioral advertising can be found at www.aboutads.info.

HOW CAN I MANAGE OR DELETE INFORMATION ABOUT ME?

If you are an Account holder, you can manage your Personal Information in your account settings and profile page. Depending on where you live, you may have legal rights to access, modify, or delete the Personal Information we hold about you. Exercise such rights must be in accordance with applicable law, and we reserve the right to charge appropriate fees to respond to such request if permitted by applicable law. To exercise these rights or delete your account, please contact us by using the contact information set forth in the How to Contact Us section below.

HOW CAN I OPT OUT OF MARKETING COMMUNICATIONS?

If you do not wish to receive marketing-related emails from us or prefer us not to process your Personal Information for marketing purposes, you may use the unsubscribe link in any of our marketing emails or contact us at info@mgicaribe.com. Please note we cannot remove your Personal Information from the databases of third parties (who are not our vendors) with whom we have shared your Personal Information prior to your opt-out request. Please contact those third parties directly.

HOW DO WE PROTECT YOUR INFORMATION?

We take reasonable precautions intended to help protect your Personal Information that we collect, including the use of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosure. Unfortunately, no system or online transmission of data is completely secure, and we cannot guarantee the security of data transmitted across the Internet. If you believe that information you provided to us is no longer secure, please notify us immediately using the contact information provided below.

LINKS TO THIRD PARTY WEBSITES

The Site may include links to third party websites and services that we do not own or operate. When you click these links, you will be directed away from the Site to that third party's website. Any information you submit on that third party's website will be subject to that third party's practices and privacy policy. We encourage you to read these third party privacy policies carefully before submitting your information.

NOTE TO INTERNATIONAL USER

Please note that your Personal Information may be stored and processed on servers in the United States. The laws on holding personal data in the United States may differ from the laws of other countries. By using the Site, you consent to the transfer, storage and use of your Information in accordance with applicable laws and with this Privacy Policy.

YOUR CALIFORNIA PRIVACY RIGHTS.

Under California law, California residents have the right to request a list of all third parties to whom a company has disclosed their Personal Information for those third parties' direct marketing purposes. We do not currently share Personal Information with third parties for those third parties marketing purposes; however, if you are a California resident and would like information on how to exercise your rights concerning third party disclosures, please contact us at privacy@mgicaribe.com.

CHILDREN'S PRIVACY

The Site is not directed to or intended for use by minors. Consistent with the requirements of the U.S. Children's Online Privacy Protection Act and similar rules in other jurisdictions, if we learn that we have received any information directly from a child under age 13 (or such other age as set by the laws of jurisdictions outside the U.S.) without his or her parent's verified consent, we will use that information only to respond directly to that child (or his or her parent or legal guardian) to inform the child that he or she cannot use the Site and subsequently, we will delete that information.

HOW WILL WE NOTIFY YOU OF CHANGES TO THIS PRIVACY POLICY?

The Effective Date of this Privacy Policy is set forth at the top of this page. If we make a material change to the way we treat your Personal Information, we will notify you in advance via email or through the Site. Your continued use of the Site after the Effective Date of any changes constitutes your acceptance of the amended Privacy Policy. Any amended Privacy Policy supersedes all previous versions.

CONTACT US

To learn more about how we use your information, please contact us using the information below:

By Mail: Airport Shoppes, Corp.
P.O. Box 37779
San Juan, PR 00937

By Phone: 787 791-8500

By Email: info@mgicaribe.com