

## Privacy Policy

This Privacy Policy describes how Cyber Insecurity (collectively, “we,” “us,” or “our”) collects, uses, shares, and safeguards personal information. This Privacy Policy also tells you about your rights and choices with respect to your personal information, and how you can reach us to get answers to your questions. You can jump to particular topics by going to the headings below:

### Types Of Information We Collect.

### Use And Processing Of Information.

### Sharing Of Information.

### Your Choices.

### Authorized Agent

### Annual Data Requests

### How We Protect Personal Information

### Cookie Policy

### Miscellaneous

### Contact Information

### Types Of Information We Collect.

The following provides examples of the type of information that we collect from you and how we use that information.

Context	Types of Data	Primary Purpose for Collection and Use of Data
Account Registration	We collect your name and contact information when you create an account. We also collect information relating to the actions that you perform while logged into your account.	We use this information to provide account related functionalities to our users. Accounts can be used for easy checkout and to save your preferences and transaction history.
Cookies and first party tracking	We use cookies and clear GIFs. “Cookies” are small pieces of information that a website sends to a computer’s hard drive while a web site is viewed.	We use this information to ensure our website operates efficiently.
Cookies and Third Party Tracking	We participate in behavior-based advertising, this means that a third party uses technology (e.g., a cookie) to collect information about your	We use this information to engage in behavior-based advertising and capture website analytics.

	use of our website so that they can provide advertising about products and services tailored to your interests on our website, or on other websites.	
Demographic	We may collect personal We use this information to comply with Information information, such as your age, location, and gender.	Applicable laws.
Distance Information	When you use our App we may collect your location from the GPS, Wi-Fi, and/or cellular technology in your device to determine your location and your distance from a store that sells our products.	We have a legitimate interest in understanding our users and providing tailored services. In some contexts our use is also based upon your consent to provide us with geo location information.
Email Interconnectivity	If you receive email from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains and make purchases.	We use this information to understand how you interact with our communications to you.
Employment	If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.	We use information about current employees to carry out our payment and benefits obligations. In some contexts, we are also required by law to collect information about our employees. We also use this information to have efficient staffing and work force operations.
Feedback/Support	If you provide us feedback or contact us for support we will collect your name and e-mail address, as well as any other content that you send to us, in order to reply.	We use this information in order to receive, and act upon, your feedback or issues.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address.	We share information about our products and services with individuals that consent to receive such information. We also use this information to share information about our products or services.
Mobile Devices	We collect information from your mobile device such as	We use this information to identify unique visitors and

	unique identifying information broadcast from your device when visiting our website or when visiting one of our stores.	understand how users interact with us on their mobile devices.
Order Placement	We collect your name, billing address, shipping address, e-mail address, phone number, and credit card number when you place an order.	We use your information to perform our contract to provide you with products or services.
Partner Promotion	We collect information that you provide as part of a co-branded promotion with another company.	We use this information to fulfil our promotions.
Surveys	When you participate in a survey we collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.	We use this information to understand your opinions and collect information relevant to our organization.
Sweepstakes or contests	When you participate in a sweepstakes or contest we collect information about you which includes contact information to notify you if you are selected.	We use this information to operate the sweepstakes. In some contexts we are also required by law to collect information about those that enter into our sweepstakes.
Website interactions	We use technology to monitor how you interact with our website. This may include which links you click on, or information that you type into our online forms. This may also include information about your device or browser.	We use this information to understand how you interact with our website to better improve it, and to understand your preferences and interests in order to select offerings that you might find most useful. We also have a legitimate interest in detecting and preventing fraud.
Web logs	We collect information, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to a computer when the Internet is used), domain name, clickactivity, referring website,	We use this information to monitor our networks and the visitors to our websites. Among other things, it helps us understand which of our products or services is the most popular.

	and/or a date/time Fmp for visitors.	
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In addition to the information that we collect from you directly, we may also receive information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. For example, if you submit a job application, or become an employee, we may conduct a background check.

### **Use And Processing Of Information.**

In addition to the purposes and uses described above, we may use information in the following ways:

- To identify you when you visit our websites.
- To provide products and services or to process returns or changes to your flight booking.
- To improve our services and product offerings.
- To streamline the checkout process.
- To conduct analytics.
- To respond to inquiries related to support, employment opportunities, or other requests.
- To send marketing and promotional materials, including information relating to our products, services, sales, or promotions.
- For internal administrative purposes, as well as to manage our relationships.

Although the sections above describe our primary purpose in collecting your information, in many situations we have more than one purpose. For example, if you complete an online purchase we may collect your information to perform our contract with you, but we also collect your information so that we can quickly and easily respond to any questions about your order or process change requests. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our general interest in conducting our business.

### **Sharing Of Information.**

In addition to the specific situations discussed elsewhere in this policy, we disclose information in the following situations:

1. **Affiliates and Acquisitions.** We may share information with any corporate affiliates (e.g., parent company, sister companies, subsidiaries, joint ventures, or other companies under common control). If another company acquires, or plans to acquire, our company, business, or our assets, we will also share information with that company, including at the negotiation stage.
2. **Other Disclosures with Your Consent.** We may ask if you would like us to share your information with other unaffiliated third parties who are not described elsewhere in this policy.
3. **Other Disclosures without Your Consent.** We may disclose information in response to subpoenas, warrants, or court orders, or in connection with any legal process, or to comply with relevant laws. We may also share your information in order to establish or exercise our rights, to defend against a legal claim, to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies, or to

comply with your request for the shipment of products to or the provision of services by a third party intermediary.

4. **Public.** Some of our public accounts on external websites (e.g., Instagram) may provide the opportunity to post comments, or reviews, in a public forum. If you decide to submit information on these pages, that information may be publicly available.
5. **Partner Promotion.** We may offer contests, sweepstakes, or other promotions with third party partners. If you decide to enter a contest, sweepstakes, or promotion that is sponsored by a third party partner the information that you provide will be shared with us and with them. Their use of your information is not governed by this privacy policy.
6. **Service Providers.** We may share your information with service providers. Among other things service providers may help us to administer our website, conduct surveys, provide technical support, process payments, and assist in the fulfillment of orders.
7. **Sale of Information.** We do not sell personal information.

### **Your Choices.**

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 as set forth below. If required by law, upon request, we will grant you reasonable access to the personal information that we have about you. 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. **Deletion Of Your Personal Information.** You may request that we delete your personal information by contacting us as set forth 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.
3. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.
4. **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 service related communications.
5. **Promotional Mailings.** If at any time you do not want to receive offers and/or circulars from us you can remove yourself from our mailing lists by contacting us at [spirit.com/Help](https://spirit.com/Help), select "submit a question" and write "NO SNAIL MAIL" in the subject line along with your name, address and zip code in the description box. Please note that our mailings are prepared in advance of their being sent. Although we will remove your name from our mailing list after receiving your request, you may still receive mailings from us that had been initiated prior to your name being removed.
6. **Promotional Text Messages.** If you receive a text message from us that contains promotional information you can opt-out of receiving future text messages by following the instructions indicated therein.

Please submit any requests via our [email address](#).

Note that, as required by law, we will require you to prove your identity. We may conduct an identity verification by phone call, email or via other secure means. Depending on your request, we may ask for information such as your name, the last item you purchased from us, or the date of your last purchase from us. 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 some circumstances, certain California residents may designate an authorized agent to submit requests to exercise certain privacy rights on their behalf. The authorized agent is required to submit a valid power of attorney and complete the affidavit made available on our [email address](#). Note that we may deny a request from an authorized agent that does not submit sufficient proof that they have been authorized to act on behalf of another individual.

### **How We Protect Personal Information**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable efforts to protect your personal information from unauthorized access, use, or disclosure, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

Some of our websites permit you to create an account. When you do you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account.

### **Cookie Policy**

A cookie is a small data file that Web sites often store on your computer's hard drive when you visit. We use cookies in order to improve your online experience and to facilitate effective site administration. Cookies enable us to keep track of your reservation as you book on our site. They also allow us to recognize guests who have saved their info with us when they visit, and to provide those guests with their account information. If you save your info with Spirit or book on our site, we use cookies to monitor and maintain information about how you use our site and what you book. If you have not saved your info with us or booked from our site, we may monitor and maintain information about your use of our Web site in a manner that does not identify you. In either case, this information helps us to serve you better by improving our site design, as well as our products, services, contests, and promotions.

Through our use of cookies, we track and maintain the identity of the Web site you visited immediately prior to visiting [www.spirit.com](http://www.spirit.com). Keeping track of the site you came from prior to visiting [www.spirit.com](http://www.spirit.com) can help us to improve our site design.

You can refuse cookies by turning them off in your Web browser. However, if you turn off cookies, we may not be able to track your reservation, which means you may be unable to book on our site. Also, we may not be able to recognize you as a guest who has saved information with us.

We allow certain third-party companies to serve ads and/or collect certain anonymous information when you visit our web site. These companies may use information (not including your name, email address, or telephone number) about your visits to this and other web sites in order to provide advertisements about goods and services of interest to you. If you would like more information about this practice and to know your choices about not having this information used by these companies, you can visit the Network Advertising Initiative web site.

**Miscellaneous**

The following additional information relates to our privacy practices:

- Third Party Applications/Websites. We have no control over the privacy practices of websites or applications that we do not own.
- Changes To This Privacy Policy. We may change our privacy policy and practices from time to time. We will note the effective date of the latest version at the end of the Privacy Policy.
- Children. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

**California Information Sharing Disclosure**

California law indicates that organizations should disclose for California residents the categories of information collected, the business purpose of the collection, and identify categories of third parties to whom it is being disclosed. Please note that because this list is comprehensive it may refer to types of information that we share about people other than yourself. We do not discriminate against California consumers who exercise their privacy rights.

Categories of Personal Information That We Collect	Categories of Third Parties (Including service providers) to Whom We Disclose Personal Information for Business Purpose
<p><b>Identifiers</b> – such as full name, postal address, phone number, email address, passport number (international travel), or other similar identifiers.</p>	<ul style="list-style-type: none"> <li>• Third parties that help administer, manage, analyze our programs and services, such as customer service providers, and loyalty program administrators</li> <li>• Third parties that provide marketing and data analytics services, such marketing communications providers, data analytics providers, and advertising networks</li> <li>• Government entities, auditors, lawyers, and other parties as required by law, including litigation</li> <li>• Third parties necessary to complete transactions and provide our products and services, including service management and fulfillment</li> <li>• Third parties that provide us with information technology services, such as</li> </ul>

	<p>internet service providers, operating systems and platforms, and data service providers</p> <ul style="list-style-type: none"> <li>• Payment processors and financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention</li> <li>• Third parties that assist us with security programs, fraud prevention, detection, and mitigation</li> </ul>
<p><b>Financial information</b> – such as bank account number, credit or debit card number, or other financial information.</p>	<ul style="list-style-type: none"> <li>• Payment processors and financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention</li> <li>• Third parties necessary to complete transactions and provide our products and 8 services, including service management and fulfillment</li> <li>• Third parties that help administer, manage, analyze our programs and services, such as customer service providers, and loyalty program administrators</li> <li>• Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, and data service providers</li> <li>• Government entities, auditors, lawyers, and other parties as required by law, including litigation</li> <li>• Third parties that assist us with security programs, fraud prevention, detection, and mitigation</li> </ul>
<p><b>Protected characteristics</b> – such as gender.</p>	<ul style="list-style-type: none"> <li>• Government entities, auditors, lawyers, and other parties as required by law, including litigation</li> </ul>
<p><b>Commercial information</b> – such as information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<ul style="list-style-type: none"> <li>• Third parties that help administer, manage, analyze our programs and services, such as customer service providers, and loyalty program administrators</li> <li>• Third parties that provide marketing and data analytics services, such marketing communications providers, data analytics providers, and advertising networks</li> </ul>



	<ul style="list-style-type: none"> <li>• Third parties that assist us with information technology and security programs</li> </ul>
<p><b>Network activity data</b> – internet or other electronic network activity information, such as browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement.</p>	<ul style="list-style-type: none"> <li>• Third parties that help administer, manage, analyze our programs and services, such as customer service providers, and loyalty program administrators</li> <li>• Third parties that provide marketing and data analytics services, such marketing communications providers, data analytics providers, and advertising networks</li> <li>• Payment processors and financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention</li> <li>• Third parties necessary to complete transactions and provide our products and services, including service management and fulfillment</li> <li>• Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, and data service providers</li> <li>• Third parties that assist us with security programs, fraud prevention, detection, and mitigation</li> <li>• Government entities, auditors, lawyers, and other parties required by law, including litigation</li> </ul>
<p><b>Biometric information</b> – such as fingerprint, face print or voice print.</p>	<ul style="list-style-type: none"> <li>• Third parties that assist us with security programs, fraud prevention, detection, and mitigation</li> <li>• Government entities, auditors, lawyers, and other parties as required by law, including litigation</li> </ul>
<p>Geolocation data – such as precise physical location.</p>	<ul style="list-style-type: none"> <li>• Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, and data service providers</li> <li>• Third parties that help administer, manage, analyze our programs and services, such as customer service providers, and loyalty program administrators</li> </ul>

	<ul style="list-style-type: none"> <li>• Government entities, auditors, lawyers, and other parties as required by law, including litigation</li> </ul>
<p><b>Electronic and sensory data</b> – such as audio, electronic, visual, or similar information (e.g., pictures, a recording of a customer service call, security video surveillance footage).</p>	<ul style="list-style-type: none"> <li>• Third parties that help administer, manage, analyze our programs and services, such as customer service providers, and loyalty program administrators</li> <li>• Third parties that provide marketing and data analytics services, such marketing communications providers, data analytics providers, and advertising networks</li> <li>• Third parties that assist us with security programs, fraud prevention, detection, and mitigation</li> </ul>
<p><b>Inferences</b> – drawn from any of the information listed above to create a profile</p>	<ul style="list-style-type: none"> <li>• Third parties that help administer, manage, analyze our programs and services, such as customer service providers, and loyalty program administrators</li> <li>• Third parties that provide marketing and data analytics services, such marketing communications providers, data analytics providers, and advertising networks</li> <li>• Government entities, auditors, lawyers, and other parties as required by law, including litigation</li> <li>• Third parties necessary to complete transactions and provide our products and services, including service management and fulfillment</li> <li>• Third parties that provide us with information technology services, such as internet service providers, operating systems and platforms, and data service providers</li> <li>• Payment processors and financial institutions, and others as needed to complete transactions and for authentication, security, and fraud prevention</li> <li>• Third parties that assist us with security programs, fraud prevention, detection, and mitigation</li> </ul>

**Effective Date: August 1, 2021**