

## Privacy Statement

Thank you for visiting The Club and/or The Club Mobile website (the "Site" or "Sites") brought to you by General Growth Management, Inc. ("we" or "us" or "GGMI"). We provide this Privacy Statement to highlight our policy with regard to the privacy of information we may gather through your use of this Site. The policies contained in this Privacy Statement are incorporated by reference in the Terms of Use (<http://www.ggpmail.com/crm/2009/rules/2009rules.pdf>) (the "Agreement").

### 1. COLLECTION OF PERSONALLY IDENTIFIABLE INFORMATION

In order to use and participate in certain services provided to you by GGMI through The Club or The Club Mobile such as our customer relationship program, retailer promotions, surveys, sweepstakes, and mobile communications (collectively the "Site Services"), you may be required to register with us. In order to register, you will be required to provide certain personally identifiable information, such as your first and last name, postal address, birth date, gender, email address and/or cell phone number, and possibly volunteer other information ("Registration Profile Page"). If you are unwilling to disclose the required information in connection with your registration, you will still be able to access those portions of the Site available to non-registered users of the Site. You must be 13 or older to register with the Site. The United States Children's Online Privacy Protection Act ("COPPA") went into effect on April 21st, 2000. In order to comply with that act, we will not knowingly process any data that was submitted to us by a visitor who is under 13 years of age. Please visit [www.ftc.gov](http://www.ftc.gov) and search for COPPA for information from the Federal Trade Commission about protecting children's online privacy. By completing the Registration Profile Page you have indicated that you are interested in receiving information on special offers and promotions, and we may send you such information by via mail and email if you joined The Club or via mail and mobile telephone devices if you joined The Club Mobile. In addition, we may share user information with affiliated businesses and third parties that we believe are reputable to offer products and services that may be of interest to you. When you visit the Site, our server may place small temporary text files called "cookies" on your computer's processor or in the browser directory of your hard drive. These cookies may contain a unique identifier that enables us to personalize your visit to the Site and create a better experience for you. For example, when you access the Site, a cookie will enable us to provide you with information on the GGP mall closest to you. You may choose not to accept cookies by setting your web browser to either refuse all cookies or to notify you each time before a cookie is set. If you choose to refuse cookies, however, you may not be able to use all the features of the Site, including but not limited to the site services, contests, and promotions. Even after you have become a registered user, you may later choose not to receive such information from us by Opting-Out of the program.

To Opt-Out of The Club send an email to [TheClub@ggp.com](mailto:TheClub@ggp.com) and enter UNSUBSCRIBE in the subject line .To Opt-Out of The Club Mobile send an email to [TheClubMobile@ggp.com](mailto:TheClubMobile@ggp.com) or send a text message to 50304 with the words STOP in the text message via the mobile phone number you registered. If you Opt-Out, you will no longer receive such special offers and information from us. You may, however, remain an entrant in certain contests or sweepstakes as indicated in the Official Rules of those promotions. This Privacy Policy does not, however, apply to other Internet websites that are not under our control ("Third-Party Websites"), or to other third parties; you should contact such entities directly regarding their use of your information.

### 2. PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

We do not make available to the general public any personally identifiable information you provide to us in connection with your registration on the Site. We use industry standard technology and efforts to safeguard the confidentiality of your personal identifiable information. These include secure servers and firewalls. All of the user data we collect is protected against unauthorized access. Authorized employees and contracted agencies who need the information to perform a specific job are granted access to this information.

### 3. CHANGES TO YOUR PERSONALLY IDENTIFIABLE INFORMATION; YOUR ABILITY TO CORRECT INACCURACIES

To make changes to your personal information provided to The Club you must send an email to [TheClub@ggp.com](mailto:TheClub@ggp.com).

To make changes to your personal information provided to The Club Mobile you must send an email to [TheClubMobile@ggp.com](mailto:TheClubMobile@ggp.com).

Following such correspondence a representative of GGMI will make the changes or contact you to arrange for the appropriate changes to your personal information profile.

#### **4. LINKS TO THIRD-PARTY SITES**

The Site provides links to Third-Party Websites that are not under our control. If you click on a banner advertisement that appears on one of the pages of the Site, you may be transported to a Third-Party Website and away from this Site. THIS PRIVACY STATEMENT APPLIES TO THIS SITE ONLY, AND IS NOT INTENDED TO DESCRIBE THE PRIVACY POLICIES OF THIRD-PARTY WEBSITES WITH REGARD TO THE COLLECTION AND USE OF PERSONALLY IDENTIFIABLE INFORMATION; WE ARE NOT RESPONSIBLE FOR THE PRIVACY PRACTICES OF THIRD-PARTY WEBSITES. IF YOU CLICK ON A BANNER ADVERTISEMENT OR A LINK TO A THIRD-PARTY WEBSITE, YOU SHOULD REVIEW THE PRIVACY POLICY OF SUCH THIRD-PARTY WEBSITE, IF ANY, TO DETERMINE THAT SITE'S PRACTICES WITH REGARD TO THE COLLECTION AND USE OF PERSONALLY IDENTIFIABLE INFORMATION. Any link on the Site to a Third-Party Website does not imply an endorsement of the privacy practices of such Third-Party Website by us, and no such Third-Party Website is authorized to make any representation or warranty on our behalf.

#### **5. NON-PERSONALLY IDENTIFIABLE INFORMATION**

During your visit to the Site, we may ask for certain anonymous, non-personally identifiable information, such as your zip code, age, gender, consumer preferences, and the like. Such information is used to gain a better understanding of usage trends and we provide it to third parties for their general marketing research purposes. We may use your Internet Protocol ("IP") address to help diagnose problems with our server, and to administer the Site. We may use IP addresses to gather non-personally identifiable demographic information, such as how many users visited a certain part of the Site, but not to track a specific IP address to the identity of an individual user.

#### **6. THIS PRIVACY STATEMENT MAY CHANGE**

This privacy statement may change from time to time. General Growth Management, Inc. reserves the right to change it without notice. If you believe that General Growth Management, Inc. has in some way not complied with the policies outlined in this Privacy Statement, or if you have any other questions relating to privacy, please let us know by sending an e-mail message detailing your concern to [TheClub@ggp.com](mailto:TheClub@ggp.com)

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