

PRIVACY POLICY

Effective Date: July 14, 2016.

This Privacy Policy applies to your participation in the Southwest Customer Advisory Council market research access panel (the “Panel”) and your use of <https://www.southwestadvisorycouncil.com> and any other websites or services that post a link to this Privacy Policy, and all features, content, and other services that we own, control and make available through such websites (collectively, the “Service”). This Privacy Policy describes how Southwest Airlines Co. (“Southwest Airlines,” “we,” “our,” or “us”) collects, uses, and shares information about you through the Service.

By using our Service, you agree to our [Terms and Conditions](#) and consent to our collection, use and disclosure practices, and other activities as described in this Privacy Policy.

Information Collection.

Information You Provide to Us. We collect information you provide directly to us through the Service. For example, we collect information when you register for, use or log in to the Service, take our surveys, communicate with us through the Services.

The types of information we may collect include Personal Information. "**Personal Information**" is information that can be used to identify you and/or any other individuals (whether alone or in combination), such as your first and last name, preferred name, date of birth, e-mail address, phone number, and Rapid Rewards® account number.

We may invite you to participate in online surveys or other research projects. The information requested in these surveys and/or projects may include, but not be limited to, your opinions, purchase history, and purchase intent regarding consumer and/or business products and services. These surveys may also request information defined as sensitive (e.g., data directly or indirectly revealing racial and ethnic origins, political, philosophical, or religious opinions, trade union affiliation, or health or other potentially sensitive topics).

You have the option to provide demographic profile data (such as occupation, travel frequency, and areas of interest). Failing to provide this information will not stop you from participating in the Panel. However, it is encouraged so you can receive a more personalized experience.

We collect and use general profiling data to tailor your experience with the Service. As part of your membership in the Panel, we will ask questions to understand who you are, in order to make sure we provide you with the surveys and communications best suited to you. Profiling questionnaires are optional, but they will allow you to participate in our most interesting research, which can lead to higher rewards. Questionnaires cover many topics, from automotive to household shopping. In order to help research on matters such as health and social issues, we will also ask you about more sensitive topics. Please note these questions are entirely optional and you can choose whether or not to answer them.

You may choose to voluntarily submit certain other information to us through the Service, including Personal Information, but you are solely responsible for your own Personal Information in instances where we have not collected such information or requested that you submit such information to us.

Information We Collect Automatically. We and our service providers automatically collect certain information about you when you access or use our Service. This information may include, without limitation, demographic information; IP address; browser/device/hardware type; operating system characteristics; referring and exit pages; information about your use of our Service; and data regarding network connected hardware (e.g., computer or mobile device), such as unique device identifiers, type, model, version, MAC address, device or session ID, error related data status, capability, confirmation, functionality, performance data, and connection type. This information may also include clickstream data, which is information about the page-by-page paths you take as you browse through the Service.

This information is gathered by certain tools and methods such as:

Log Information: We collect information about your use of our Service, such as the type of browser you use, access times, pages viewed, your IP address and the referring link through which you accessed our Service.

Cookies: Cookies are data files placed on a device when it is used to visit a website. These cookies may be used for many purposes, including, without limitation, tracking user preferences or web pages visited while using our Service. Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser to remove or reject cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Service.

Web Beacons: We may include small graphic images called web beacons, also known as "Internet tags" or "clear gifs," in our web pages and e-mail messages. We may use web beacons or similar technologies for a number of purposes, including, without limitation, to count the number of visitors to our Service, to monitor how users navigate the Service, and to count how many e-mails that we sent were actually opened or how many particular articles or links were actually viewed.

Embedded Scripts: An embedded script is programming code that is designed to collect information about your interactions with the Service. It is temporarily downloaded onto your device from our web server or a third party with whom we work, is active only while you are connected to the Service, and is deleted or deactivated thereafter.

Location-identifying Technologies: We may use GPS (global positioning systems) software and other location-based technologies to locate you so we may verify your location, and deliver relevant content to you based on your location.

In-App Tracking Method: There are a variety of tracking technologies that may be included in mobile applications, and these are not browser-based like cookies and cannot be controlled by browser settings. Some use device identifiers or other identifiers to associate app user activity to a particular app.

Information we automatically collect about you, such as how you interact with our Service, may be combined with your Personal Information. If we associate any such automatically-collected information with Personal Information about you, we will treat the combined information as Personal Information.

Information We Collect From Your Rapid Rewards® Account. In order to use the Service, you must first link your Rapid Rewards® account to the Service. We may obtain and combine the information we receive from your linked Rapid Rewards® account, such as information relating to your boarding pass and Rapid Rewards® points, with information we collect about you on the Service. We consider the information from your Rapid Rewards® account to be Personal Information.

Information We Collect When You Refer a Friend. If you are selected to use our referral service to invite a friend to join the Panel, you may decide to forward an invitation to a friend. In such cases, we will ask you for your friend's name and email or postal address. Southwest Airlines may use any e-mail address provided when using this referral feature to send a single e-mail to such designated recipients about the Panel. By using a referral feature, you represent that you and your friend are United States citizens and that you have permission to provide your friend's email address.

Information We Collect From Our Partners and Other Sources. We may also obtain information about you from other sources and combine that with information we collect about you. If we receive Personal Information from a third party source and/or if we combine the information we receive from these third party sources with your Personal Information, we will treat that information as Personal Information. We are not responsible for the accuracy of the information provided by third parties or how such third parties collect, use, and share such information.

We may obtain information from our partners and append it to our existing user information to better understand users' interests and to provide more relevant content.

We may append information about you that is publicly available or information that is aggregated and/or depersonalized by partners. This information may include, for example, your travel preferences and activity, household income range, or postal code. This information may be associated with personal information as described herein, such as email address, physical address, first and last name combined, or phone number. We may use a third party vendor with whom we share your information to assist with this.

Uses of Information

We may use information about you for various purposes. Primary purposes for use of information include to:

- provide you with relevant market research surveys;
 - for market research purposes;
 - facilitate, personalize, and improve your online or app experience;
 - process your registration with our Service, including verifying that your e-mail address(es) are active and valid;
 - process and deliver frequent flyer miles, sweepstakes, contest, promotion, and survey entries and rewards;
 - respond to your comments, questions and requests and provide customer service;
 - send you technical notices, updates, security alerts and support and administrative messages;
 - contact you regarding your use of our Service and, in our discretion, changes to our policies;
 - prevent fraudulent transactions and monitor against threats;
 - communicate with you about offers, promotions, rewards and events and provide news and information we think will be of interest to you (for information about how to manage these communications, please see the **Your Choices** section below);
 - monitor and analyse trends, usage and activities;
 - improve our Service or other Southwest Airlines websites, applications, marketing efforts, products and services;
 - conduct research and analysis, including surveys, on Southwest Airlines websites, applications, products and services;
 - carry out any other purpose disclosed elsewhere in this Privacy Policy or at the time you provide your Personal Information; and
 - Any other purpose, with your consent.
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- We will not send any unsolicited commercial emails (“spam”) to you or sell your contact details to third parties.

Additional details: How We Use the Information We Collect

Sharing of Information.

Our agents, vendors, consultants, and other service providers have access to Personal Information to carry out work on our behalf. These third party service providers are prohibited from using your Personal Information for any purpose other than to provide this assistance, and they must provide protections to your Personal Information that are no less protective than those set out in this Privacy Policy. Southwest Airlines is not liable for the acts or omissions of these third party service providers except to the extent required by applicable law.

In addition, we may share information about you as follows:

- To the maximum extent permitted by applicable law, in response to (i) subpoenas or other legal process or if in our good faith opinion such disclosure is required or permitted by law; (ii) at the request of governmental authorities conducting an investigation;
- To defend the Terms and Conditions or other policies applicable to our Service;
- If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property, life, health, security and safety of us or any third party;
- To the maximum extent permitted by applicable law, we may also use IP addresses, mobile device identifiers, or any other information we collect to identify users, and may do so in cooperation with copyright owners, Internet service providers, wireless service providers or law enforcement agencies in our discretion. Such disclosures may be carried out without notice to you;
- With our service providers to verify your address in order to ensure we maintain the accuracy of our database;
- With third parties in order to enrich your profile, so as to provide you with more relevant market research surveys;
- With third parties for the fulfillment of rewards;
- With our affiliates for internal business purposes;
- Link or combine with information we get from others to help understand your needs and provide you with better service;
- In connection with, or during negotiations of, any proposed or actual merger, purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, amalgamation or any other type of acquisition of all or any portion of Southwest Airlines assets, financing, disposal, conveyance or transfer of all or a portion of our business to another company;
- For a purpose disclosed elsewhere in this Privacy Policy, or at the time you provide Personal Information; and
- With your consent or at your direction.

In our sole discretion, we may also share aggregated or de-identified information that cannot reasonably be used to identify you with third parties or affiliates.

Information You Disclose Publicly or to Others

The Service may permit you to submit ideas, photographs, user profiles, writings, music, video, audio recordings, computer graphics, pictures, data, questions, comments, suggestions or other content, including Personal Information (collectively, “User Content”), such as on blogs and forums, and in association with your account and user profile. We or others may store, display, reproduce, publish, distribute or otherwise use User Content online or offline in any media or format (currently existing or hereafter developed) and may or may not attribute it to you. Others may have access to this User Content and may have the ability to share it with third parties. Please think carefully before deciding what information you share, including Personal Information, in connection with your User Content. Please note that Southwest Airlines does not control who will have access to the information that you choose to make public, and cannot ensure that parties who have access to such publicly available information will respect your privacy or keep it secure. We are not responsible for the privacy or security of any information that you make publicly available on the Service or what others do with information you share

with them on the Service. We are not responsible for the accuracy, use or misuse of any User Content that you disclose or receive from third parties through the Service. We are not responsible for User Content you submit to third party services via our Service.

Rapid Rewards[®], Sweepstakes, Contests, and Surveys

We may offer you the opportunity to participate in our Rapid Rewards[®] Program, sweepstakes, contests, surveys, and other promotions (each, a “Promotion”) that may require registration or for you to submit Personal Information through the Service. Participation in these Promotions is completely voluntary. If you choose to enter a Promotion, your Personal Information may be disclosed to third parties in connection with the administration of such Promotion, such as in connection with winner selection, prize fulfillment, and as required by law, such as on a winners list. By entering a Promotion, you are agreeing to the official rules that govern that Promotion, which may contain specific requirements of you, including, except where prohibited by law, allowing the sponsor and/or other parties to use your name, voice and/or likeness in advertising or marketing materials. Southwest Airlines may offer opportunities to enter a Promotion or other feature that we offer jointly with a third party. As a result of your participation in such feature, your information may be shared with the third party that is jointly offering the feature, which will be disclosed at the time your information is collected.

Third Party Services and Social Features.

Our Service may include hyperlinks to websites, locations, platforms, or services operated by third parties (“**Third Party Service(s)**”). These Third Party Services may use their own cookies, web beacons, embedded scripts, location-identifying technologies, in-app tracking methods, and other tracking technologies to independently collect information about you and may solicit Personal Information from you.

Certain functionalities on the Service permit interactions that you initiate between the Service and certain Third Party Services, such as third party social networks (“**Social Features**”). Examples of Social Features include “liking” or “sharing” our content and otherwise connecting our Service to a Third Party Service. If you use Social Features, and potentially other Third Party Services, information you post or provide access to may be publicly displayed on our Service or by the Third Party Service that you use. Similarly, if you post information on a Third Party Service that references our Service (e.g., by using a hashtag associated with Southwest Airlines in a tweet or status update), your post may be used on or in connection with our Service. Also, both Southwest Airlines and the third party may have access to certain information about you and your use of our Service and the Third Party Service. To the extent we combine information from Third Party Services with Personal Information we collect directly from you on the Service, we will treat the combined information as Personal Information under this Privacy Policy.

The information collected and stored by third parties remains subject to their privacy practices, including whether they continue to share information with us, the types of information shared,

and your choices on what is visible to others on Third Party Services. We are not responsible for and make no representations regarding the policies or business practices of any third parties or Third Party Services and encourage you to familiarize yourself with and consult their privacy policies and terms of use.

Analytics Services.

We may engage third parties to provide analytics about the use of our Service. These entities may use cookies, web beacons, pixels, embedded scripts, location-identifying technologies, in-app tracking methods, and other technologies to automatically collect information about your use of the Service, such as your device, ID, IP address, web browser, pages viewed, time spent on pages, links clicked and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online or travel activity.

These and other third parties may collect Personal Information about your use of the Service over time and across services for purposes such as to associate different devices you use. You may have certain choices regarding these activities as explained in the next section.

Note that your browser settings may allow you to automatically transmit a “Do Not Track” signal to websites and online services you visit. There is no consensus among industry participants as to what “Do Not Track” means in this context. Like many online services, Southwest Airlines currently does not alter its practices when it receives a “Do Not Track” signal from a visitor’s browser. To find out more about “Do Not Track,” you may wish to visit <http://www.allaboutdnt.com>.

Your Choices

You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of registration. The Service may allow you to access, review, correct, update, and remove or make inaccessible Personal Information you have provided through the Service’s registration or otherwise, and you may provide registration updates and changes by logging into your account or contacting us by phone, e-mail, or postal mail as detailed [here](#).

With respect to our mobile and other applications, you can prospectively stop all collection of information by the application by uninstalling the application. Also, you may at any time opt out from further allowing us to have access to your location data by adjusting the permissions in your mobile device.

We will make good faith efforts to make requested changes in our then-active databases as soon as reasonably practicable (but we may retain prior information as business records). Please note that it is not always possible to completely remove or delete all of your information from our databases and that residual data may remain on backup media or for other reasons.

Panel. You can opt out of the Panel by clicking ‘My Profile’ on the top right of the page after logging into the website [here](#). Under the ‘Cancel my membership’ section, you’ll have the option to click ‘Unsubscribe’ and unsubscribe your email address from the Panel.

E-mail Messages. You can opt out of receiving certain promotional e-mails from us at any time by following the instructions as provided in e-mails to click on the unsubscribe link or by sending an e-mail to us [here](#) with the word UNSUBSCRIBE in the subject field of the e-mail. This will not affect subsequent subscriptions and if your opt out is limited to certain types of e-mails the opt out will be so limited. We reserve the right to send you e-mails relating to your account or use of our Service, such as administrative and service announcements and these transactional account messages may be unaffected if you choose to opt out from receiving our promotional e-mail.

Calls. By using the Service, you consent to receive ongoing calls (including by auto-dialers) from us to gather your feedback and comments regarding your use of the Service. You can opt out of receiving these calls from us by sending an e-mail to us [here](#) with the words STOP CALLS in the subject field of the e-mail or telling us anytime during these calls of your request to opt out. However, subsequent or different subscriptions will be unaffected by any opt out.

Children.

Our Service is not intended for nor targeted toward children under the age of thirteen (13). We do not knowingly collect personal information as defined by the U.S. Children’s Privacy Protection Act (“**COPPA**”) from children under the age of thirteen (13), and if we learn that we have collected such information, we will delete the information in accordance with COPPA. If you are a child under the age of thirteen (13), you are not permitted to use the Service and should not send any information about yourself to us through the Service. If you are a parent or guardian and believe we have collected information in a manner not permitted by COPPA, please contact us [here](#).

Our Service is not intended for not targeted toward California residents under the age of eighteen (18). Any California residents under the age of eighteen (18) who have registered to use the Service, and who have posted content or information on the Service, can request that such information be removed from the Service by contacting us by e-mail as detailed [here](#) or by sending a letter to Southwest Airlines Co., P.O. Box 36611, HDQ-4GC, Dallas, Texas 75235 (Attention: General Counsel), stating that they personally posted such content or information and detailing where the content or information is posted. We will make reasonable good faith efforts to remove the post from prospective public view or anonymize it so the minor cannot be individually identified. This removal process cannot ensure complete or comprehensive removal. For instance, third parties may have republished the post and archived copies of it may be stored by search engines and others that we do not control.

Your California Privacy Rights.

California law permits customers in California to request certain details about how their information is shared with third parties and, in some cases, affiliates, for those third parties' and affiliates' own direct marketing purposes.

We do not share Personal Information with third parties or affiliates for those third parties' or affiliates' own direct marketing purposes.

If you are a California resident, you may request information about our compliance with this law by sending a letter to Southwest Airlines Co., P.O. Box 36611, HDQ-4GC, Dallas, Texas 75235 (Attention: General Counsel). Any such request must include "California Privacy Rights Request" in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address or mail address.

Data Security.

- We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Although Southwest Airlines uses reasonable efforts to help protect your information, transmission via the Internet is not completely secure and Southwest Airlines cannot guarantee the security of your information collected through our Service. Further, you are responsible for protecting your password. Our privacy policy undergoes an independent review.

Changes to This Privacy Policy

This Privacy Policy is current as of the effective date set forth above. Southwest Airlines reserves the right to change this privacy policy from time to time consistent with applicable privacy laws and principles. If we make changes to this Privacy Policy we will notify you by revising the date at the top of this Privacy Policy, and in some cases, we may provide you with additional notice (such as adding a statement to the homepages of our Service or sending you an e-mail notification). If the changes are material, we may provide you additional notice.

Contact Us

If you have any questions, complaints, or suggestions regarding this Privacy Policy, please feel free to contact us by phone, e-mail, or postal mail as detailed [here](#).

I. Information Collected

A. Profiling information

Our websites' registration forms require you to provide contact information (full name, postal address, date of birth, and email address) to register as a Member of the Southwest Airlines

programs.

You have the option to provide demographic profile data (such as occupation, travel frequency, and areas of interest). Failing to provide this information will not stop you from participating in the Southwest Airlines programs. However, it is encouraged so you can receive a more personalized experience.

1. **General Profiling Information**

We collect and use general profiling data to tailor your experience with the Southwest Airlines programs.

As part of your membership with Southwest Airlines Customer Advisory Council, we will ask questions to understand who you are, in order to make sure we provide you with the surveys and communications best suited to you.

Profiling questionnaires are optional, but they will allow you to participate in our most interesting research, which can lead to higher incentives.

Questionnaires cover many topics, from automotive to household shopping. In order to help research on matters such as health and social issues, we will also ask you about more sensitive topics. Please note these questions are entirely optional and you can choose whether or not to answer them.

2. **Personal Information / Personal Data (including Sensitive Personal Data)**

Southwest Airlines will always ask for your explicit consent when collecting either Personal Information or Sensitive Personal Data for any reason.

Collection of personal information may occur at registration, within our profiling surveys, and as part of some of our market research surveys. We gather certain information automatically and store it in log files. This information may include Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring and exit pages, operating system, date and time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

We do not share, sell, rent or trade personal information with other third parties for their promotional purposes.

Once collected, Personal Information and Sensitive Personal Data may be shared for (i) the augmentation of Member information with statistical information available from a third party, (ii) independent auditing and/or verification of respondent data for quality control purposes, and (iii) the suppression of Member contact information from email communications that a Member has not consented to receiving. When our sponsors, our Reward Partners, our Panel Partners, our Marketing Partners, our Clients and other third parties receive Personally Identifiable Information (PII) from Southwest Airlines, they are required to sign legally binding agreements that hold them accountable to applicable data privacy laws and relevant industry standards.

B. Surveys and Sensitive Data

Southwest Airlines may invite you to participate in online surveys or other research projects. The information requested in these surveys and/or projects may include, but not be limited to, your opinions, purchase history, and purchase intent regarding consumer and/or business products and services. These surveys may also request information defined as sensitive (e.g., data directly or indirectly revealing racial and ethnic origins, political, philosophical, or religious opinions, trade union affiliation, or health or sexual life).

C. Refer a Friend

If you are selected to use our referral service to invite a friend to join Southwest Airlines' programs, you may decide to forward an invitation to a friend. In such cases, we will ask you for your friend's name and email or postal address. We will automatically send your friend a one-time email, inviting him or her to join the Southwest Airlines program.

Southwest Airlines will store your friend's information for the sole purpose of sending a one-time email. Your friend may contact Privacy@Researchnow.com to request that we remove this information from our database.

D. Inbound Communications with our Member Services Team

When our Member Services team receives your call, it may be recorded for quality purposes. Emails that are received by Southwest Airlines Customer Advisory Council Member Services are protected and handled as classified information. Your phone number or email is kept by the Member Services teams.

E. Edit / Correct your Personal Information

If there is incorrect information on your Southwest Airlines Customer Advisory Council account statement, please TBD.

We will retain your personal information, unless your account is deactivated or terminated. We will either delete or de-identify personal information as necessary per local laws and regulations.

If you wish to terminate your account or request that we no longer use your personal information to provide you services, or to delete your personal information from the Southwest Airlines database, please TBD. We will respond as promptly as possible.

F. Transfer of Ownership

In the event that Southwest Airlines goes through a business transition, such as a merger, acquisition by another company, or sale of all or a portion of its assets, your personal information will likely be among the assets transferred. If so, you will be notified via email or a prominent notice on our website will displayed for at least thirty (30) days with information regarding change in ownership, uses of your personal information, and choices you may have regarding your personal information.

G. Email Correspondence

Email correspondence is a requirement to participate. Southwest Airlines does not sell, rent, or lease your email address, nor does Southwest Airlines share such information with third parties for the purpose of sending you advertisements for products or services unaffiliated with Southwest Airlines, its affiliates, or business partners, without your consent.

II. How We Use the Information We Collect

A. Identification Verification

Southwest Airlines may use a third-party supplier to verify your identity as stipulated in ISO 26362 standard for access panels.

B. We Will Not Spam You

Southwest Airlines Customer Advisory Council is an opt-in email program. With your consent, we will send emails inviting you to participate in surveys. If you no longer want to receive email communications from Southwest Airlines, you must request that Southwest Airlines discontinue sending you emails or cancel your membership as described in Section 2. E, Edit / Correct your Personal Information

C. Protection of Personal Information

We will not sell, trace, rent, disclose or make available your identity, email address, phone number, or home address to any outside third party, without receiving your authorization to do so, unless we are required to do so by a court decision or by a public authority.

We may disclose your personal information as required by law, to comply with a subpoena or similar legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud or respond to a government request.

We gather certain information automatically and store it. This information may include Internet protocol (IP) addresses, browser type, and other information designed to make your experience and interaction as positive and efficient as possible.

D. Reward Fulfillment

We use third parties, such as fulfillment companies, to fulfill various types of Reward redemptions as defined within the Terms and Agreements document. When you redeem a

Reward, we will share your name and email or physical address, as necessary, for the third party to provide that service.

In this circumstance, you will have consented to the collection, use, storage, and processing of your personal information / personal data by that third party. These companies are authorized to use your personal information only as necessary to provide these services to you.

E. Survey Activity

1. Collection of Personal Information / Personal Data as Part of a Survey

Some of our clients use research methodologies which need to collect your personal information; examples include product tests and telephone or face-to-face interviews.

Similarly, some of our research surveys may collect sensitive information when conducting healthcare or social research. We will describe the nature of the research and ask for your informed consent. You will have the option to opt-out from that collection.

2. Supplemental Information

In order to provide better survey experiences for you, we may occasionally supplement your personal information (including PII) with information collected from third party sources. Examples might include your interests, hobbies, or sports you like.

F. Segmentation / Related Data

1. Segmentation

We use your demographic and profile data to build segments. This segment data is used to enhance your survey experience. We share this data with trusted third parties on an anonymous summary or an aggregated group basis.

2. Profile Enhancements

We purchase marketing data from third parties and add it to our existing Member database to provide enriched analytical data for our clients' use.

While this marketing data will be associated with personal information within the Southwest Airlines panels, all personal information is removed from the marketing data before such data is provided to any client, unless we have your explicit consent to share that information.

G. Reward Fulfillment

If you enroll through a program sponsor and allow us, by checking the corresponding box on the

Member registration or Welcome Gift form, we may share select enrollment information, which may including your full name, post or zip code, and your email address, with the Sponsor who invited you into the program and the Sponsor from whom you selected a Welcome Gift.

If you desire, this will enable you to foster a relationship with the Sponsors and receive email communications from them. You acknowledge that if you have consented to our disclosure of your personal information to a Sponsor, they may collect, use, and disclose that information in accordance with their privacy policy.

We enter into sponsorship agreements only with major brands that strive to respect our Members' privacy to the maximum extent permitted by law. Please note that Southwest Airlines will not be responsible for and will not be liable for our Sponsors' actions concerning your information or for any Sponsor's privacy practices when you are dealing directly with them.

IV. Cookies

A. Persistent and Session Cookies

A cookie is a small text file containing information about a Member that is placed by a website on the Member's device. Southwest Airlines places persistent cookies on your computer when you complete the registration form or log into Southwest Airlines websites. Persistent cookies are used to store your email address and encrypted password. We use these cookies to recognize you when you visit our websites so that we may provide you with customized pages based on information in your Member account or profile.

We also place a session cookie on your computer while you are participating in a survey or viewing the Southwest Airlines websites without logging in. Session cookies are used to maintain your session state across your Web requests. These cookies are used to record when you finish a survey, how much of the survey you complete, the country from where you are viewing the survey, and the language you are using to view the website.

B. Advanced / Tracking Cookies and Technologies

We and our partners, affiliates, or analytics or service providers, may also use tracking cookies, tags, and scripts to track certain information about you based on your activity on our site or third parties' sites. We use this information to conduct internal research on our Member's demographics, interests and behavior, and to understand and serve you better.

We and our third party partners use Local Shared Objects (Flash cookies) and Local Storage (HTML5) to provide certain features on our websites, to display advertising based on your web browsing activities, and/or to store content information and preferences. Various browsers may

offer their own management tools for removing HTML5. To manage Flash cookies, please click here: http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager07.html.

We provide market research analysis data to our Reward Partners and Marketing Partners on the effectiveness of their websites and advertisements. We do not tie the information gathered by tracking cookies on the effectiveness of websites and advertisements to our Members' PII.

Our tracking cookies do not track Members who are at or below specific years of age, as indicated in the terms and conditions document.

If you delete cookies on your browser after opting out, you will have to opt-out again. You can opt-out of the provision of data from our data partners to us, and out of receiving advanced cookies on your computer by clicking on “My Account” to update your preferences.

If a cookie is received by a Member directly from a third party, regardless of the Member's participation in the Southwest Airlines program, opting out with Southwest Airlines will not prevent the Member from receiving that third party's cookie.

Third Party use of Links: If another person uses your computer login, you should inform them if you have agreed to accept the tracking cookie on the computer as part of your profile, and if that person links to certain online advertisements, then the information may be captured by Southwest Airlines.

Your access to our websites and/or application will not be affected if you opt-out of tracking cookies placed by third parties.

C. Clear Gifs / Web Beacons / Web Bugs

Our third party tracking utility partner employs a software technology called clear gifs (also known as web beacons or web bugs), that informs us what content is effective and helping us improve Members' sites. Clear gifs are tiny graphics which contain unique identifiers that function similar to cookies and are used to track the online Member movements on Websites. In contrast to cookies which are stored on a Member's computer hard drive, clear gifs are embedded invisibly on webpages. We do not tie the information gathered by clear gifs to our Members' personally identifiable information.

V. Mobile Data Collection

A. Mobile Applications (“Apps”)

Southwest Airlines offers mobile applications which allow panel Members to use their mobile device to access their panel accounts and participate in Market Research projects. We use a prominent vendor's software development kit in these Apps. Under our vendor agreement, we will be provided with certain data about your device containing the Apps and your use of the Apps. You may continue your Southwest Airlines membership and opt-out of the vendor's collection of data from your device by contacting us to opt-out of data collection with our mobile App. If you opt-out of the vendor's collection of data from your device, they will discontinue sharing your data with us.

B. Location-Based Services

To use our Mobile Apps, you are required to give us certain personal information (i.e., your full name, postcode, date of birth, email address, etc.). In addition, if you desire to use the functionality of certain surveys and receive credit for completing such surveys, you are required to turn on geo-location tracking services through your mobile device's GPS functions. We will only share this information with our mapping provider for the sole purpose of providing you this service. We may share your geo-location data with third parties for the purpose of them serving you ads for places (such as restaurants) in your area. If you do not wish to allow us to share your information in this manner please opt-out by contacting us at urllname@coname.com. You may opt out of location-based services at any time by editing the setting at the device level.

C. Passive Data Collection

When you download and use our Services, we automatically collect information on the type of device you use, operating system version, and the device identifier (UDID).

The data collection and use practices described in third party's privacy policies are independent from our data collection practices, throughout your participation in our mobile Apps.

We may share your profile data, survey responses, and, if you use the App+ application, your mobile behavioral data with our vendor. They may associate such information with data that is specific to your device. If our vendor combines your profile data and survey responses collected through the Apps, and your mobile behavioral data collected through the App+ application with data specific to your device, the vendor may use the resulting data, subject to applicable law and industry standards.

When the vendor shares data with us as described above, we may use that data in the same manner as your profile data, survey responses, and, in the case of the App+ application, your mobile behavioral data.

D. Mobile Analytics

We use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software may record information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and

from where the application was downloaded. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

E. Push Notifications

We send you push notifications from time-to-time in order to update you about survey invitations or promotions that we may have. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

VI. Third Party Websites

A. Links in Third Party Websites

Our websites may contain links to other Internet sites that are not operated or controlled by Southwest Airlines. We cannot control and are not responsible or liable for the privacy practices or the content of such websites. If you submit your personal information to any of those sites, your information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website you visit.

B. Social Media Features and Widgets

Social media sites, such as Facebook and Twitter, include social media features such as the 'Like' button, and widgets such as the 'Share' button or interactive mini-programs that are run on our U.S. websites.

These features may collect personal information about you, including your IP address, which webpage you are visiting on our websites, and may set a cookie to enable the feature to function properly.

Social media features and widgets are either hosted by a third party or hosted directly on our websites.

Your interactions with these features are governed by separate terms and conditions with the company providing it. Your personal information will be handled by these companies in accordance with their privacy policies.

Members typically have the ability to opt-out or to block certain types of tracking information collected or shared about them by such sites.

Please visit the relevant social media websites to understand their privacy practices and the

options they may make available to you in relation to their collection of your personal information.

VII. Contests

Occasionally, Southwest Airlines, or in cooperation with third parties, may sponsor sweepstakes or similar games of chance on this website and, as a result, may request information from you for participation purposes. Your participation in these contests is completely voluntary and you have the choice of whether or not to provide this information. The information will be used by Southwest Airlines to notify the winners and award prizes. We reserve the right to share this information in an anonymous singular summary and/or aggregated format with third parties. All contests will be conducted in accordance with local laws and regulations.

VIII. Data Security

A. Retention Policy

We will retain your information for as long as your Member account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, [contact us](#). We will retain and use your information as necessary to comply with legal obligations, resolve disputes and enforce our agreements.

IX. Notifications

A. Changes to the Privacy Policy

We reserve the right to update this Privacy Policy periodically by posting an amended version to the Southwest Airlines websites. Please refer to this policy regularly.

If we change how we use your personal information or personal data, or update our email practices, we will notify you either on the Member home page of our websites or via email prior

to the change becoming effective.

B. How to Contact Us / How to Lodge Complaints.

C. Opting Choices

As a Member participating in our program, you must opt-in by making an explicit and affirmative indication of choice, indicating your desires.

If you would like to opt-out of Southwest Airlines membership, you may request that your membership be cancelled and your account closed by cancelling your membership online. You can, at any time, withdraw your consent to our use of your personal data as described in the Privacy Policy by cancelling your membership. Please contact us.

You may request that Southwest Airlines discontinue sending you emails without canceling of your Southwest Airlines membership by clicking on the unsubscribe link found at the bottom of email communications from Southwest Airlines. To resume receiving email from Southwest Airlines, please contact us.