

## PRIVACY POLICY

The privacy and security of your information is very important to us. Whether you are booking a room or just a prospective client browsing our website (the "Site") and looking at our property, we want you to trust that the information that you have provided to us is being properly managed and protected.

This Privacy Policy is issued by Abellona Inn & Suites (the "Hotel"), which includes its parents, subsidiaries, and affiliates, and covers information collected and used by the Hotel in the course of its business. Your information may be collected and used by the Hotel through your use of this Site. We have prepared this Privacy Policy to explain more about how we collect and manage your information.

### **INFORMATION WE COLLECT:**

Information you give us. In your use of the Site, you may provide us with various information that personally identifies you. For example, we collect information from you when you make a booking through our reservation system or stay at the Hotel. Information collected during the course of the reservation and during your stay may include:

- Your name, email address, home and business address, phone number, nationality and payment card information; and
- Information such as stay and room preferences made during the course of your reservation such as your preferred room type and specific requests to the Hotel.

This information may be provided to us directly when you make a reservation through our reservation system, through our websites, directly at the hotel or through mobile applications. In some cases, we may receive this information from a third party, such as when you book through an online travel agency such as booking.com.

**INFORMATION WE GET FROM YOUR USE OF THE SITE.** We also collect information from you when you browse the Site, use our mobile applications or participate in certain services at the Hotel, such as wireless internet services. In these instances, information such as your country information, internet protocol ("IP") address, media access control address and other characteristics about your system or device may be automatically collected. This information may be collected for functional purposes as well as to improve your experience when using these services. This information may also be used for aggregated trend and statistical analysis, and for showing you more relevant advertisements and messages. Site usage may also provide us with other information including, without limitation, domain server, type of computer, and type of web browser and other relevant information about your online experience and use of the Site.

**INFORMATION STORED ON YOUR COMPUTER ("COOKIES").** When you visit this Site, the Hotel may store some information on your computer. This information will be in the form of a "cookie" or similar file and can help us maintain and improve this Site. A "cookie" is a small amount of data that is transferred to your browser by a Web server and can only be read by the server that gave it to you. It functions as your identification card, recording such things as Internet addresses, passwords, and preferences. When you visit the website again, the cookie allows that site to recognize your browser. It cannot be executed as code or deliver viruses. With most Internet browsers, you can erase "cookies" from your computer hard drive, block all "cookies," or receive a warning before a "cookie" is stored. Please refer to your browser instructions to learn more about these functions.

**HOW WE USE THIS INFORMATION:** We use the information collected from you primarily to fulfill your hotel reservation. Prior to your stay, this may include sending your information to the Hotel or sending you pre-stay communications. Following your stay, we may also send you post-stay communications and satisfaction surveys to get feedback on your experience.

In some instances where we have your consent or where permitted under applicable law, we may send you marketing communications (which may include text messages) for products and services that we believe would be relevant for you. We also may use information related to your stay to display targeted advertisements on our websites or on third party websites or to send you more relevant messaging. Additionally, we use this information for purposes of aggregated trend and statistical analysis to

evaluate and improve our products and services, plan new hotel locations and services and other market research.

**WHO WE SHARE YOUR INFORMATION WITH:** We will share your information with the Hotel you are staying at to fulfill your reservation. We may also share your information with third party service providers to provide services in relation to our business as well as to help us improve our products and services. For example, we might use a third party or a third-party product for the purposes of market research and data analytics. In certain instances, subject to local consent requirements, third party service providers may also assist us with various marketing campaigns.

Aside from the purposes described above, we do not share your stay information with any other third parties unless we have your consent or under special circumstances, such as:

- when we believe in good faith that the disclosure is required by law or to protect the safety of hotel guests, employees, the public or Hotel property;
- when disclosure is required to comply with a judicial proceeding, court order, subpoena, warrant or legal process; or
- in the event of a merger, asset sale, or other related transaction.

There may be other times when we collect and use personal information, for example if you choose to participate in one of our competitions or sweepstakes, sign up to receive our newsletters or other special offers and promotions, download one of our mobile applications or participate in one of our other services. In these instances, we will collect information from you for running and administering the respective competition, sweepstakes or service that you have elected to participate in. The information collected may include personal details such as your name, address, and contact information, as well as certain demographic information. In each case, we will collect, use and secure your information in a manner consistent with the general principles set out in this Privacy Policy unless we tell you otherwise.

## **LOCATION INFORMATION AND SERVICES**

We may receive information about your location during the course of and for the purpose of providing you the services described above through your use of our websites and mobile applications. For example, if you are using our mobile applications and have consented to sharing your location information with us, this information might be collected through GPS or Bluetooth technologies to enable us to provide certain services to you such as customized offers and promotions. In addition to your use of our websites and mobile applications, we may also receive location information from wireless networks or cellular towers in proximity to your mobile device, through your internet protocol (“IP”) address or through your use of other services we provide at our hotels, such as wireless internet services. We may also have access to location information that you provide to us through your use of social media, such as when you “tweet” your location. Your location preferences can be set or modified at the device level or through modifying your settings with the relevant social media platform.

## **SOCIAL MEDIA**

We may use various social media features such as the Facebook “Like” button on our websites and mobile applications. Certain information may be shared or otherwise provided to us through your use of these features in conjunction with our services and programs. Subject to your account and privacy settings, we may also be able to see information that you post when using these social media platforms whether or not you are using one of our services. In some instances, depending on the circumstances, we may contact you on these social media platforms. The information you post on social media sites as well as the controls surrounding these disclosures are governed by the respective policies of these third parties.

## **HOW WE SECURE YOUR INFORMATION**

We are committed to protecting the confidentiality and security of the information that you provide to us. To do this, technical, physical and organizational security measures are put in place to protect against any unauthorized access, disclosure, damage or loss of your information. The collection,

transmission and storage of information can never be guaranteed to be completely secure, however, we take steps to ensure that appropriate security safeguards are in place to protect your information.

## **MANAGING YOUR PREFERENCES AND INFORMATION**

We want to ensure that you have the necessary tools at your disposal to control the information that you provide to us, including how we communicate with you. It is also important that you contact us to update your information if any of it is inaccurate or changes.

## **MANAGING YOUR INFORMATION**

Through the provision of the services described above, we and in some instances our third-party partners and service providers, may communicate with you in relation to a reservation or to support any other services that we provide.

In the event any information that you provide to us is inaccurate and changes need to be made or you would like certain information deleted, your information can be updated on the Site or by contacting a customer service representative at the Hotel. Please note that in some instances it may not be possible to delete certain pieces of your information. In other instances, we may not have the ability to delete certain pieces of information that are stored on our systems or that have been provided to third parties in connection with the services discussed in this Privacy Policy.

## **LINKS TO OTHER SITES**

Our websites and applications may contain links to websites that are maintained and/or controlled by third parties. We make no representations or warranties with respect to such third-party websites. We encourage you to review the privacy policies of these third-party websites as their privacy practices may differ from ours.

## **CHILDREN**

Our websites are not intended for children and we do not intentionally solicit or collect personal information from individuals under the age of 18. If we are notified or otherwise discover that a minor's personal information has been improperly collected, we will take all commercially reasonable steps to delete that information.

## **CHANGES TO THIS PRIVACY POLICY**

In some instances, we may have to change, modify or amend this Privacy Policy in order to comply with the evolving regulatory environment or the needs of our business. We reserve the right, at any time and without notice, to add to, change, update or modify this Privacy Policy, subject to any applicable legal requirements.