



## Royal Park Hotel Privacy Policy

This policy describes how Royal Park Hotel collects, uses, and shares personal information. Please note that we are a member of BWH Hotel group. When you provide information to BWH Hotel group or book through a third party OTA, that information is collected through them and is then relayed to our Hotel. Please refer to their individual company privacy policies for information about their practices.

### Use and Processing of the Information We Collect

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

| Context   | Types of Information   | Primary Purpose for Collection and Use of Information   |
|---|--|---|
| <b>Room Reservations</b>                        | <p>When you book a room reservation on our website or contact BWH Hotel group, we collect your contact information, payment information, reservation information, and accommodation preferences. In a small number of cases we collect information about a guest's health. For example, a guest may voluntarily choose to provide information about a disability as part of a request for an accommodation preference. Note that if you book a room reservation on a different website (e.g., an online travel agency), your information is not being collected by Royal Park Hotel.</p> | <p>We use your information in order to fulfill your requests for a reservation and to take steps in anticipation of your stay.</p> <p>In addition, we also need your information to comply with legal obligations to collect and maintain information about our guests. In the rare circumstances in which we collect information about a guest's health, that information is collected only for the purpose of accommodating a guest's needs and is used for no other purpose.</p> |
| <b>WorldHotels Rewards<sup>SM</sup> ("WHR")</b> | <p>World Hotels offers a loyalty program that entitles members to certain benefits or discounts. We collect your contact information, communication preferences, reservation history, redemption details, and partner loyalty program elections (if any). Information is collected when you register for WHR, redeem reward points, make a hotel reservation as part of WHR, update your WHR account, or link your WHR account to a partner loyalty program.</p>   | <p>World Hotels, an affiliate of Royal Park Hotel uses your information in order to perform contractual obligations to you. For example, they would use the information to allow you to earn and redeem rewards, points or credits in connection with WHR.</p> <p>They also have a legitimate interest in marketing to you and analyzing trends and patterns among our rewards members.</p>   |



|                                |   |  |
|--------------------------------|---|--|
| <b>Email Interconnectivity</b> | If you receive emails from us, we use certain tools to capture data related to when you open our message, click on any links or banners it contains, or make reservations.  | Collected information is used simply to understand how to better interact with our guests in how and when you receive information.   |
| <b>Customer Care</b>           | If you contact us with an issue we will collect your name and e-mail address as well as any other information that you choose to provide to us in order to reply.   | We have a legitimate interest in receiving and acting upon the information that you provide to us concerning issues that you bring to our attention.   |
| <b>Communications List</b>     | When you opt-in or sign up for one of our mailing lists we collect your name, email address, and email interests.   | We share information about our products and services or the products and services if you consent to receive that information. We also have a legitimate interest in sharing information with you about our services and those of our partners. |
| <b>Mobile Devices</b>          | We collect information from your mobile device such as unique identifying information broadcast from your device when visiting our websites or applications.  | We have a legitimate interest in identifying unique visitors and in understanding how users interact with us on their mobile devices.  |
| <b>Surveys</b>                 | When you participate in a survey we collect information that you provide through the survey.  | We have a legitimate interest in understanding your opinions and collecting information relevant to our organization to improve our services.  |
| <b>Website Interactions</b>    | We use technology to monitor how you interact with our website. This may include the links you click on or information that you type into our online forms.   | We have a legitimate interest in understanding 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.                           |
| <b>Web Logs</b>                | 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, click-activity, referring website, and/or a date/time stamp for visitors. | We have a legitimate interest in monitoring our networks and the visitors to our websites. Among other things, it helps us understand which of our services is the most popular.   |



C3 consultants provides public access to the interne, and the C3 Consultants network on an “as is” basis with all risks inherent in such access. By connecting to the C3 Consultants network, the user acknowledges the risks associated with public access to the internet and hereby releases and indemnifies C3 Consultants, the owner and manager of the venue at which the internet is accessed, and any affiliate of the foregoing parties from any damages that might occur.

**WiFi Access**

We have a legitimate interest in providing WiFi networks and in collecting information for fraud and security purposes.

**Employment Candidates**

If you apply to work for us we collect information necessary to evaluate your application.

We use information about prospective employees in connection with our legal obligations and our legitimate interest in evaluating candidates.

**Employees**

If you are or were an employee of Royal Park Hotel, we collect information necessary to your employment.

We use information about current employees in connection with our employment obligations. In some contexts, we are also required by law to collect information about our employees and we have a legitimate interest in complying with those laws. We also have a legitimate interest in using employment information to have efficient staffing and work force operations.

In addition to the information that we collect from you directly, we may also receive information about you from other sources, including business partners, or publicly available sources. For example, if you ask someone to transmit information to us, we will use that information as part of our legitimate interest to, among other things, respond to your query or provide customer service and support.

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

- For internal administrative purposes as well as to manage our relationships.
- To conduct analytics.
- To identify you when you visit our websites.
- To provide service to you and to improve our services and product offerings.
- 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.
- To streamline the reservation or checkout process.
- For the safety and security of guests, staff, and other visitors.



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 make a room reservation we collect your information so that we can perform a contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your stay. As a result, our collection and processing of your information may be based upon our need to perform a contract, our obligations under law, our legitimate interest in conducting our business, and/or your consent.

### Sharing Of Information

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

1. **WorldHotels Rewards:** We may share information with BWH Hotel group, as they operate WHR in order to allow you to earn and redeem rewards, points, or credits in connection with your loyalty program membership and in accordance with your chosen earning and spending preferences. For example, we may provide you with the choice to select a particular airline partner through which you can earn loyalty points. We also share information with independent companies if you have selected that you would like to receive promotions and marketing material from third party-business partners.
2. **Travel Agents and Online Travel Websites.** We share your information with travel agents, that you use in order to process your reservation request and to comply with any requirements or needs of those entities.
3. **Service Providers.** We share your information with service providers. Among other things, service providers help us to administer our databases, websites, marketing, communications, and surveys; service providers provide us with technical and logistical support; service providers process payments on our behalf; and service providers assist in the fulfillment of reservations and orders.
4. **Public.** Some of our websites 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 publically available.
5. **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 or for national security requirements within the jurisdictions in which we operate. 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. We also may share information with our corporate affiliates (*e.g.*, subsidiaries, joint ventures, or other companies under common ownership or control). In addition, 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.
6. **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.



## Your Choices

You can make the following choices regarding your personal information:

1. **Promotional Emails.** 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.
2. **Changes to Your Personal Information.** We rely on you to update and correct your personal information. Most of our websites allow you to modify or delete your account profile. Note that we may keep historical information in our backup files as permitted by law. If our website does not permit you to update or correct certain information you can request that your information be changed by contacting us. Although we will attempt in good faith to respond to your request, we may not be able to change your information in all circumstances. For example we may not be able to change your information if doing so would impose an undue burden or expense, or if it would require us to change information relating to another person.
3. **Deletion of Your Personal Information.** You can request information about how long we keep a specific type of information by contacting us at the address described below. You can request that your information be deleted. If required by law we will delete your personal information after such a request is made. You should note that there are some situations in which we may decline to delete your information. For example, we may keep your personal information as needed to comply with our legal obligations, resolve disputes, and/or enforce any of our agreements.
4. **Revoking Consent or Objecting to Processing.** You can revoke consent to processing (where such processing is based upon consent) or object to our processing. If you revoke consent or object to further processing, we may no longer be able to provide you services. In some cases, we may limit or deny your request if the law permits or requires us to do so, or if we are unable to adequately verify your identity.
5. **Online Tracking.** We do not currently recognize automated browser signals regarding tracking mechanisms, which may include "Do Not Track" instructions.

## How We Protect Personal Information

No method of transmission over the Internet or 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 any breach to your personal information, we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

When making a reservation, you may be permitted 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.



## How Long We Retain Information

We retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. For example, we retain WHR information for as long as an individual remains a WHR member because WHR points do not expire and the information is needed in order to allow the individual to redeem their rewards. We retain information in our reservation system, in full or in summary form, for three years following a guest's departure in order to process your reservation, provide post-reservation customer support, and provide invoicing and recordkeeping. We typically retain information in our customer care complaint system for three years after receipt, unless the information is needed for an ongoing purpose such as to address an open issue.

## Countries Used for Processing

Royal Park Hotel operates directly in the United States. Individuals that provide information to Royal Park Hotel or visit Royal Park Hotel's website should be aware that the laws of the United States may differ from those of your country of residence. For example, there may be situations in which we are required to share your information with United States law enforcement personnel.

## Miscellaneous

The following additional information relates to our privacy practices:

- **Third Party Applications, Websites, and Social Media.** We have no control over the privacy practices of websites or applications that we do not own. Our website or our communications may also contain plug-ins and other features that integrate third party social media platforms. If you interact with these, the third parties who operate these platforms may be able to identify you, determine how you use our website, and link and store this information with your social media profile.
- **Changes to This Privacy Policy.** We may change our privacy policy and practices over time. To the extent that our policy changes in a material way, the policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy.