

PRIVACY POLICY

Last updated: January 2019

PRESTIGE HOTELS AND RESORTS is committed to protecting your privacy and wants you to be familiar with how we collect, use, and disclose Personal Information (as defined below). References to “**PRESTIGE HOTELS AND RESORTS**,” “**we**” and “**us**” throughout this Policy, depending upon the context, collectively refer to **PRESTIGE HOTELS AND RESORTS** and any affiliate of **PRESTIGE HOTELS AND RESORTS**.

By using this website or a mobile application (“**Site**”), including text message, providing Personal Information (as defined below) to **PRESTIGE HOTELS AND RESORTS**, or otherwise indicating your consent to receipt of marketing or other information from us, you consent to all actions taken by us with respect to your Personal Information as set forth in this Policy. If you do not agree to the terms and conditions of this Policy, please do not use the **Site** or provide any Personal Information to **PRESTIGE HOTELS AND RESORTS** through our **Site** or otherwise.

PERSONAL INFORMATION WE COLLECT

PRESTIGE HOTELS AND RESORTS may collect “**Personal Information**” from you, meaning information that identifies you as an individual or from which you may be identified.

For example, we may collect:

- contact information, such as your name, mailing address, e-mail address, and telephone number;
- credit card number or other payment account number, billing address, and other payment and billing information (“**Payment Information**”);
- **PRESTIGE REWARDS** program member information. Including online user account details, profile or password details;
- records and copies of your correspondence if you contact us;
- information necessary to fulfil special requests (e.g., health conditions that require specific accommodation);
- guest stay information, including the hotels where you have stayed, date of arrival and departure, and goods and services purchased;
- information collected through the use of security cameras, card key and other security systems; and
- in limited cases, information relating to the credit of customers.

We may collect Personal Information from a variety of sources including:

- through the **Site**;
- through reservation processes;
- through social media and brand channels (e.g. Facebook, Twitter);
- from **PRESTIGE HOTELS AND RESORTS** and from its Affiliates or other third parties; or
- when you otherwise voluntarily provide it to us, including in connection with our loyalty program (i.e. **PRESTIGE REWARDS** program).

We may also combine Personal Information we collect with publicly available Personal Information and Personal Information we receive from others or cross-reference with others. The collection and use of Personal Information, whether separately or combined, is done in accordance with and for the purposes described in this Policy.

If you voluntarily share "Sensitive Information" (e.g., Personal Information related to your health) with us, that information will only be used as necessary to fulfill special requests (e.g. health conditions that require specific accommodations). For example, if you voluntarily convey a health-related need to us, we may store and use that information in order for us to provide a room with appropriate amenities. We do not collect or store Sensitive Information unless it is voluntarily provided by you. By providing such Sensitive Information, you expressly consent to our collection, processing and storage of that information in accordance with the terms of this Policy.

PRESTIGE HOTELS AND RESORTS REWARDS PROGRAM

In order to enroll in the PRESTIGE REWARDS program, you must provide us with some of your Personal Information, such as your name, e-mail address, mailing address, and phone number, which is required in order to create and manage your account, administer the PRESTIGE REWARDS program, and provide the benefits of the PRESTIGE REWARDS program to you.

Enrolling in or maintaining a membership in the PRESTIGE REWARDS program constitutes your acceptance of the PRESTIGE REWARDS program terms and conditions and your express written consent to all actions taken by us with respect to your Personal Information in compliance with this Policy. Your continued use of the Site after expiration of the PRESTIGE REWARDS program constitutes your implied consent to all actions taken by us with respect to your Personal Information in compliance with this Policy.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

PRESTIGE HOTELS AND RESORTS collects Personal Information about guests, visitors to the Site, and others, so that we can provide an experience that is responsive to the needs of such individuals. PRESTIGE HOTELS AND RESORTS may collect, use, and disclose Personal Information for one or more of the following purposes:

Fulfillment of Reservation or Information Requests. To fulfill your requests such as completing a credit card transaction or booking a reservation at any of our Hotels through our reservation system, or responding to your requests that we send marketing, informational or other newsletters to you (and to personalize such newsletters and the Site to your preferences). For example, when you make a reservation through PRESTIGE HOTELS AND RESORTS's online reservation system, Synxis, we may collect payment information from you, and may use and disclose such payment information to fulfill your reservation.

PRESTIGE HOTELS AND RESORTS maintains a worldwide accessible website which is intended to help PRESTIGE HOTELS AND RESORTS conduct business and to facilitate the operation and maintenance of its reservation system.

Membership Programs. To administer and operate voluntary membership programs, including our loyalty program such as the PRESTIGE REWARDS program, which allows members to earn and redeem rewards, points, or credits in connection with the program.

Administrative and Other Communications. To send you important information regarding the Site, changes to our terms, conditions, and policies, or other administrative information (e.g., information about your travel reservations, such as reservation confirmations and pre-arrival communications). We may also use your Personal Information to determine whether you are eligible for and/or inform you, if you have provided your consent, to send marketing communications or tell you about products, programs, enhancements, events, special offers, and services of PRESTIGE HOTELS AND RESORTS, and any of its Affiliates, that might be of interest to you. For more information, see the “Your Choices” section of this Policy below.

Promotions. To operate sweepstakes, contests, or other marketing or promotional activities (collectively, “Promotions”). We typically ask you for certain Personal Information when you enter or participate in such Promotion and, if applicable, win a prize. We use such Personal Information to administer the Promotion. Participation in these Promotions is completely voluntary, and you have a choice whether you disclose your Personal Information. You should carefully review the rules, if any, of each Promotion in which you participate, as it may contain additional important information about PRESTIGE HOTELS AND RESORTS’ use of your Personal Information. To the extent that the Promotion’s rules concerning the treatment of your Personal Information conflict with this Policy, the Promotion’s rules shall control.

Surveys. To conduct or facilitate surveys and to ask for your responses to questionnaires in order to provide better products and services to guests and Site visitors. Completion of any surveys or questionnaires is strictly voluntary; and you may choose whether or not to participate, and therefore disclose this information. Information requested may include contact information (such as name and address), and demographic information (such as postal code, age level). Contact information will be used to communicate regarding specific feedback, concerns or questions. Survey information will be used for the purposes of monitoring or improving the use and satisfaction of this site and/or our hotels.

Customer Care. To track, process, and respond to customer care inquiries and to enhance and improve the customer’s experience.

Internal Business Purposes. For our internal business purposes, such as data analysis, audits, developing new products, enhancing the Site, improving our services, identifying usage trends and visiting patterns, determining the effectiveness of our Promotions, and meeting contractual obligations (e.g., a contractual obligation with regard to earning or redeeming PRESTIGE REWARDS points or miles through our airline partners).

Our Legal Duties. To comply with legal and regulatory requirements or demands in accordance with applicable law, a court order, subpoena, or other legal process.

Terms of Use. We may enforce or apply our Terms of Use and/or other agreements and policies.

Additional Uses. We may also use your Personal Information in other ways as described when you provide such information to us or for other purposes with your consent.

HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

PRESTIGE HOTELS AND RESORTS and Affiliates. We may share your personal information with PRESTIGE HOTELS AND RESORTS' Affiliates so that they may use such personal information for the purposes described in this Policy. PRESTIGE HOTELS AND RESORTS' Affiliates are required to protect your personal information consistent with this Policy. PRESTIGE HOTELS AND RESORTS is the entity that is responsible for the management of such jointly used personal information.

This would be to provide our Hotels and Affiliates, with information on the rewards, points, or credits earned by you in connection with the PRESTIGE REWARDS program, and to allow our Hotels and Affiliates, to determine whether you are eligible for and/or inform you, if you have provided your consent, of products, programs, services, and promotions that they believe might be of interest to you.

Third-Party Service Providers. PRESTIGE HOTELS AND RESORTS sometimes relies on a Third-Party Service Provider to provide certain products and services on our behalf, (e.g. customer care, e-mail delivery services, text messaging services, communication and delivery of promotional and marketing materials via e-mail, direct mail, and text message, administering guest surveys and promotions, administration, data analysis, and other similar services). We may share your Personal Information for the purpose of enabling these third parties to provide such services or as otherwise necessary for the ongoing operation of PRESTIGE HOTELS AND RESORTS' business, including operation of programs such as the PRESTIGE REWARDS program. When we do outsource the processing of your personal information to third parties or provide your personal information to Third Party Service Providers, we require those third parties to protect your personal information with reasonable security measures, such as data encryption, transmitted in a secure way; and to limit their use only to the purposes for which we have disclosed to them.

PRESTIGE REWARDS PARTNERS. PRESTIGE HOTELS AND RESORTS may also share your Personal Information with companies that we have partnered with or that are participants in our PRESTIGE REWARDS program to allow you to earn and redeem rewards, points, or credits in connection with your PRESTIGE REWARDS membership and in accordance with your chosen earning and spending preferences (e.g., selection of a particular airline partner through which you can earn PRESTIGE REWARDS points).

Promotions. Personal information submitted in connection with promotions may be shared with third-party sponsors of such promotions (irrespective of whether such promotions are hosted by us), or otherwise in accordance with the rules applicable to such promotion.

Assignment. In the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of PRESTIGE HOTELS AND RESORTS's or the PRESTIGE HOTELS AND RESORTS Affiliates' business, we may transfer any and all information that we collect pursuant to this Policy. Any successor, assignee, or transferee may use your personal information as described in this Policy.

Social Networking Forums. PRESTIGE HOTELS AND RESORTS may make available interactive services (e.g., message boards, forums, and blogs) through which you may post information and materials on the Site. Please note that any information you disclose through such services becomes public information and may be available to visitors to the Site and to the general public. We urge you to exercise discretion and caution when deciding to disclose your Personal Information, or any other information, through these services. If you choose to voluntarily disclose your personal Information through such a forum it may be available to the public and might be used by others for any purpose.

Law Enforcement; Emergencies; Compliance. We may disclose your Personal Information: (i) when we have reason to believe that it is necessary to identify, contact, or bring legal action against persons or entities that may be causing injury to you, PRESTIGE HOTELS AND RESORTS or its Affiliates; (ii) when we believe that applicable law or regulation (including laws and regulations outside your country of residence) requires it; (iii) as mandated by subpoena, court order, or legal process; (iv) to establish or exercise our legal rights, defend against legal claims, or protect our operations or those of any PRESTIGE HOTELS AND RESORTS or its Affiliates; (v) to protect the rights, privacy, safety, or property of PRESTIGE HOTELS AND RESORTS, or its Affiliates, you, or others; (vi) to investigate, prevent, or take action regarding suspected illegal activities, (vii) to investigate, prevent, or take action regarding suspected fraud, (viii) to investigate, prevent, or take action regarding situations involving potential threats to the physical safety of any person, (ix) to investigate, prevent, or take action regarding violations of our Terms Of Use or other agreements or policies, or (x) as otherwise required or permitted by law.

NON-PERSONAL INFORMATION

PRESTIGE HOTELS AND RESORTS may also collect “**Non-Personal Information,**” meaning aggregated and/or anonymized information, demographic information, and any other information that does not reveal your specific identity. Because Non-Personal Information does not personally identify you, we may use and share such information with PRESTIGE HOTELS AND RESORTS, or its Affiliates and other third parties for any purpose, including without limitation to facilitate and improve your ongoing access to and use of our Site, to best tailor our services to suit personal interests, to analyze visiting patterns, enhance and improve customer service, and for our other business purposes. As you navigate the Site, we and our service providers may collect certain Non-Personal Information such as your computer type (Windows or Macintosh), screen resolution, OS version, Internet browser, and Internet browser version using automatic data collection technologies.

In addition, we may engage third party tracking and advertising providers to act on PRESTIGE HOTELS AND RESORTS' behalf to track and analyze your usage of our Site through the use of such automatic data collection technologies. These third parties collect and share with us, as we may request, Site usage information about visits to our Site, measure and research the effectiveness of our advertisements, track page usage and paths followed during visits through our Site, help us target and track use of our Internet banner advertisements on our Site and on other sites, and track use of other links from our marketing partners' sites to our Site. We do not control these third parties' tracking technologies or how they may be used.

If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

COOKIES

We may also collect information related to cookies. A cookie is a simple text file that is stored on your computer or mobile device by a website's server for tracking user interactions and behaviour. It contains anonymous information, for example a unique identifier and the name of the website, as well as some numbers and digits. Cookies allow a website to remember your preferences, and items you have placed in your shopping cart. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. The "Help" function within your browser should tell you how to do this. Alternatively, you can visit www.Allaboutcookies.Org which gives comprehensive information on how to disable cookies on a wide variety of desktop browsers. If you disable or refuse cookies, please note that some parts of this Site may then be inaccessible or not function properly.

IP ADDRESSES

Your IP address is a number that your Internet Service Provider automatically assigns to the computer that you are using to access the Site. This number is identified and logged automatically in our server log files whenever users visit the Site, along with the time of each visit and the page(s) that were visited. Collecting IP addresses is standard practice on the Internet and is done automatically by many websites. We use IP addresses for purposes such as calculating Site usage levels, helping diagnose server problems, and administering the Site. Please note that we treat IP addresses, server log files, and related information as Non-Personal Information, except when we are required to do otherwise under applicable law.

DO NOT TRACK

Your web browser may let you choose your preference as to whether you want to allow websites to collect information over time about your online activities across different websites or online services. At this time, the Site does not respond to such "Do Not Track" or similar preferences you may have configured in your web browser, and the Site may continue to collect information in the manner described in this Policy. However, as stated in the "Non-Personal Information" section above, we do allow you to exercise some choice in the information collected by adjusting your browser's cookie settings.

THIRD-PARTY SITES

The Site may contain links to third-party websites. These linked sites (which may include the websites of Affiliates, and various PRESTIGE REWARDS partners or other third parties) are not under PRESTIGE HOTELS AND RESORTS' control, and we are not responsible for the privacy practices or the contents of any such linked site (or any link contained in any linked site). We provide such links only as a convenience, and the inclusion of a link on the Site does not imply endorsement of the linked site by PRESTIGE HOTELS AND RESORTS or its Affiliates. If you decide to access any of the third-party websites linked to this Site, you do so entirely at your own risk and subject to the terms and conditions of use and privacy policies for such

websites. If you provide any Personal Information through any such third-party website, your Personal Information will be treated in accordance with the privacy policy of that third party.

SECURITY

Because the security of your personal information is important to us, we have implemented security measures that provide reasonable precautions against the unauthorized access, disclosure, alteration, or destruction of personal information. The personal information we collect from you online is stored by us and/or our service providers and protected through a combination of physical and electronic access controls, firewall technology, and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, access, misuse, or alteration of personal information. Where required by law, we will notify you of any such loss, access, misuse, or alteration of personal information that may affect you, so that you can take the appropriate actions to protect your rights. We may decide to notify you by mail, email, or telephone where permitted by law.

Please do not send us your payment information or sensitive information through e-mail or any undesignated area (e.g., submission of your credit card number in a "comment" field). If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the alleged problem by contacting the PRESTIGE HOTELS AND RESORTS Corporate Office.

YOUR CHOICES

You may always choose what personal information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected. For example, we cannot take a reservation without a name, and we may be unable to provide you with membership program related benefits. If you do not wish for us to use your contact information to promote our own or third parties' products or services, you can opt-out of any or all such promotional communications or withdraw your previous consent by contacting the PRESTIGE HOTELS AND RESORTS Corporate Office. If you have received a promotional e-mail from us and no longer wish to receive such e-mails going forward, you may opt-out by using the "Unsubscribe" function in the e-mail you have received from us.

Please note that when you unsubscribe from receiving promotional e-mails from us, your contact details will be 'suppressed' rather than deleted. This will ensure that your request is recorded and retained unless you provide a later consent that overrides it.

If you have a PRESTIGE REWARDS account, we ask you to indicate your communication preferences at the time you become a member of the PRESTIGE REWARDS program. Once you have indicated your preferences, you can change them by logging into your account.

Please note that if you opt-out as described above, we will not be able to remove your Personal Information from the databases of our Hotels, Affiliates, or other third parties with which we have already shared your personal information.

PRESTIGE HOTELS AND RESORTS does not maintain a 'data base' of any of our guests' personal information. Any information collected is handled and encrypted by our reservation and/or property management for the sole purpose of your business transaction with PRESTIGE HOTELS AND RESORTS; therefore, we cannot offer access to such information.

To make one of the requests listed above, please contact PRESTIGE HOTELS AND RESORTS Corporate Office including your full name, address, telephone number, e-mail address, PRESTIGE REWARDS number (if any), as well as the date and location of your most recent hotel stay with PRESTIGE HOTELS AND RESORTS. We use this information to ascertain your identity, or in the event we need to contact you to obtain any additional information.

If you are a PRESTIGE REWARDS member, please understand that by PRESTIGE HOTELS AND RESORTS deleting your membership information, you will lose any value associated with that membership. This includes any PRESTIGE REWARDS points that may be associated with that membership. If you want to redeem any of your PRESTIGE REWARDS points, you may do so by promptly logging into your account.

NOTE REGARDING THE USE OF THE SITE BY MINORS

The Site is not directed to minors (as defined by applicable law), and we request that such individuals do not provide personal information through the Site. If we learn we have collected or received personal information from a minor under the age of 19 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a minor under the age of 19, please contact our Corporate Office.

CHANGES TO THE POLICY

PRESTIGE HOTELS AND RESORTS reserves the right to change, modify, or amend this Policy at any time. The date this Policy was last revised is at the top of this document. If we make a material change to this Policy, we will indicate on the Site that our privacy practices have changed and will provide you with an opportunity to opt-out. Any changes to the Policy will become effective upon our posting of the revised Policy on the Site. Use of the Site following such changes constitutes your acceptance of the revised Policy then in effect.