

ONLINE PRIVACY POLICY OF EVOLUTION HOSPITALITY, LLC
RELATING TO
THE HOTEL ADELINE

Changes to the Privacy Notice and Your Duty to Inform Us of Changes

This version was last updated as of May 25, 2018.

The General Data Protection Regulation (“GDPR”) law in the European Union (“EU”) will become effective on May 25, 2018. This privacy notice sets out your rights under the new laws.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Overview

Evolution Hospitality, LLC (the “Company”) is a Controller (as defined in the GDPR) and responsible for your personal data that we collect. The Company is one of several affiliated entities which are owned directly or indirectly by Aimbridge Hospitality Holdings, LLC (the “Parent”), which affiliated entities include operators of other hotels and resort properties (those affiliates, collectively, the “Other Operators”; those properties, collectively, the “Other Properties”). The Company, the Parent and the Other Operators are sometimes referred to, collectively, as the “Affiliated Group”. You can learn more about the Affiliated Group at www.aimbridgehospitality.com. We are committed to providing our customers and website visitors of the Hotel Adeline (the “Property”) with the best service possible while also respecting their right to privacy. The Company collects information about its customers and website visitors so that we can provide them with a personalized experience that is customized for their needs. This Privacy Policy explains how the Company collects and uses the information that our customers and website visitors share with us, as well as the precautions that we take to protect the confidentiality of their information.

This Privacy Policy applies to your visits to www.hoteladeline.com, including mobile optimized versions (the “Website”). We may update this Privacy Policy from time to time to reflect additional websites or properties. When we are permitted to store or use Personal Information (defined under “Information Collection and Use” below), we may do so across the Affiliated Group for purposes described in this Privacy Policy.

It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact us free of charge at privacy@aimhosp.com.

Children's Privacy & Parental Consent

The Website is not designed, or intended for use by, anyone under age 18, and minors are expressly requested not to use these sites or submit Personal Information over them. Our Privacy Policy prohibits us from accepting users who are under the age of 18. Should we inadvertently acquire Personal Information or other data from users under the age of 18, we will not knowingly provide these data to any third party for any purpose whatsoever.

Your Consent to this Privacy Policy

Use of the Website signifies your consent, as well as the consent of the company or business for whom you use the Website and whose information you submit, to this Privacy Policy, including the collection and use of the collected information by the Company, as described in this Privacy Policy, and also signifies agreement by both you and your company to the Terms of Use for the Website, which can be accessed through the link “Terms of Use.”

Information Collection and Use

It is the policy of the Company to collect only that personally identifiable information (such as name, mailing address, email address, telephone number, etc.) (hereinafter, "Personal Information") that customers or website visitors to the Property knowingly and voluntarily provide to us. The Company will not collect Personal Information without your knowledge and consent. The Personal Information requested on the Website is necessary for the purpose of processing your reservations, providing other products or service, or answering your inquiries. Any email address collected through a third party based on your consent to receive emails from the Company or the Property will follow the same provisions as described for those who provide their email directly on the Website. By providing the Company with your Personal Information, you are giving your consent and permission for this use and any other use disclosed elsewhere at the point you submit such Personal Information.

When you visit the Website through a mobile device, we automatically collect information on the type of device you use and operating system version. We access and track location-based information from your mobile device while during your visit to the mobile website. If you no longer wish to have your geo location used, you may turn off location services at the device level. We collect your location-based information for the purpose of locating a hotel in your geographic area. We will only share this information with our mapping provider for the sole purpose of providing you the service. The Company will use your Personal Information only as provided in this Privacy Policy.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you a room or other services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Mobile App Collection and Use

When you download and use our services utilizing one of our mobile optimized websites or our mobile applications, we automatically collect information on the type of device you use and operating system version. We access and track location-based information from your mobile device during your use of our mobile application or services. We collect your location-based information for the purpose of locating a place that you may be searching for in your area. We will only share this information with our mapping provider for the sole purpose of providing you the service. If you no longer wish to have your geo location used, you may turn location services off at the device level.

Browsing

The Website does not collect, save or store Personal Information from our visitors who just browse through the Website without completing and emailing any forms, making reservations, or enrolling in our programs. Like most standard website servers, we collect (or engage third parties to collect on our behalf) non-personally identifiable information using log files, ad tracking tags, and similar technology. This includes, but is not limited to, Internet Protocol ("IP") addresses, browser type, internet service provider, referring/exit pages, platform type, date/time stamp, and click stream data. We use this non-personally identifiable information to analyze trends, administer the website, track users' movements in aggregated form, and gather broad demographic information for aggregate use. IP addresses, etc. are not linked to personally identifiable information. We currently engage the third-party service provider Google Analytics to analyze user activity on the Website. You should review Google Analytics' Privacy Policy to learn how it collects and uses information. You can find Google Analytics' Privacy Policy at www.support.google.com/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 where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile app.

We use a third-party service provider to serve ads on our behalf across the Internet and sometimes on this site. This service provider may collect non-personally identifiable information about your visits to the Website. They may also use information about your visits to this and other websites to target advertisements for goods and services. If you don't want your anonymous information collected, you may delete the existing cookies for the Website, and in your browser settings revoke the permission granted to the Website for placing cookies.

Online Hotel Booking

We request Personal Information from you in our online booking area. You must provide contact information (such as name, address, phone number and email address) and financial information (such as credit card number, expiration date and other information) in order for us to process your reservation. This information is used for billing purposes and to reserve a room or rooms at the property. If there is a problem with a reservation, the information may also be used to contact you. Your email address will be used to send promotional specials only if you sign up to participate.

Email Exclusives

You can unsubscribe at any time from the emails you receive from the Company by clicking on the unsubscribe link at the bottom of the emails.

Except as otherwise provided in this paragraph, when you stay at the Property your Personal Information will not be shared with other parties for marketing purposes, except companies within the Affiliated Group. Communicating to past guests via email is the most environmentally friendly and responsible way to communicate; therefore, we make a strong effort to acquire the email addresses of those guests that stay with us.

If you do not opt out you will continue to receive our offers emails which will be sent approximately twice a month. If at any time you receive email from the Company and you wish to opt out/unsubscribe, please click on the unsubscribe link in emails you've received from the Company. On the unsubscribe page, click 'unsubscribe' to be removed from email campaigns.

Tracking Technologies

Some of our business partners (e.g., advertisers) use cookies, Web beacons, Local Storage, HTML 5, Java Script and E-Tags on our site. We have no access to or control over these tracking technologies. This privacy statement covers the use of tracking technologies by the website only and does not cover the use of tracking technologies by any advertisers or third parties that we partner with.

A cookie is a piece of data stored on the user's computer tied to information about the user. We use both session ID cookies and persistent cookies.

At any given time, the Website may have any number of simultaneous users making reservations or updating information on the Website. In order to keep track of what function a user is performing in the Website at any particular time, the system assigns a unique identification number for each user. This is referred to as a Session ID. We use Session ID cookies to store a unique session ID so that we can keep track of user interactions with the system at any particular time. As one might expect, when there are 50 or 100 users on the system at the same time all performing simultaneous operations, it is imperative that a unique ID is appended to each user operation so that the system can respond with the right information to the right user. The cookie performs this function. It is created and stored on the user's machine the first time a user receives a response from the server. The cookie terminates, or is deleted, from a user's computer when he or she closes the browser.

We use persistent cookies only when a user gives permission to place a cookie on his or her hard drive. A persistent cookie is a small text file stored on the user's hard drive for an extended period of time. This option stores all customer information in the form of a cookie on your computer, which will automatically apply your profile data to future reservations. No credit card information will be

retained as a result. If you are using a public or shared computer, we recommend that you deselect the checkbox for Remember Me to disable this function.

The Company and our third-party partners use Local Storage, such as HTML5, to store content information and preferences. Various browsers may offer their own management tools for removing HTML5.

The Company and our third-party partners may also utilize tracking tags and pixels to gather information about your activities on the Website and other sites in order to provide you advertising based upon your browsing activities and interests. An e-tag is a HTTP header that is sent-behind-the-scenes between a web browser and a web server. Tags are tiny bits of website code that allow our partners to measure traffic and visitor behavior, understand the impact of online advertising and social channels, use remarketing and audience targeting, test, improve sites, and more.

The Company and our third-party partners may also utilize JavaScript. A JavaScript is a scripting language used to produce more interactive and dynamic websites. JavaScript can create cookies, read cookies, and delete cookies.

Our third-party partners may also use technologies called web beacons to gather information about your activities on the Website and other sites in order to provide you advertising based upon your browsing activities and interests. Web beacons, also known as web bugs, pixel tags, or clear gifs are clear graphic images of a 1-by-1 pixel that are delivered through a web browser to an end user's computer – usually as part of a web page request. The beacon operates as a tag that records a user's visit to a particular web page.

We also use tracking technologies within email communications in order to more effectively tailor offers to your needs, as well as allow us to understand booking information from email responses.

Social Media Widgets

The Website includes social media features, such as the Facebook button and widgets, such as the share this button that runs on the Website. These features may collect your IP address, which page you are visiting on the Website, 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 the Website. Your interactions with these features are governed by the privacy policy of the company providing it.

Security

We use Secure Sockets Layer (“SSL”) connections to protect the information that you provide to us through the Website. SSL encrypts information and keeps the data private and confidential between your computer and the Company. This technology helps to make it safer to transmit your credit card number over the internet.

We follow generally accepted industry standards to protect the personal information and email addresses submitted to us, both during transmission and once we receive it. No method of transmission over the internet, or method of electronic storage, is 100% secure, however. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute confidentiality or security.

If you have any questions about security on the Website, contact us by email at privacy@aimhosp.com.

COMMUNICATIONS FROM THE COMPANY

Confirmation Emails

We send all visitors who book reservations at the Property an email confirming their reservations.

Service Announcements

On rare occasions, it is necessary to send out a service related announcement. For instance, if our service is temporarily suspended for maintenance we might send users an email. Generally, users may not opt-out of these communications. However, these communications are not promotional in nature.

Customer Service

We communicate with users on a regular basis to provide requested services and, with regards to issues relating to their accounts, to reply via email or phone, as directed.

Marketing Materials

We may, from time to time, use your email information gathered through the Website for the electronic marketing of the Property or the Other Properties, or our other products or services. If you do not wish to receive these electronic marketing materials, please see the Choice/Opt-out section below.

DISCLOSURE OF INFORMATION TO THIRD PARTIES

Disclaimer

Though we make every effort to preserve user privacy, we may need to disclose Personal Information when required by law when we have a good faith belief that such action is necessary to comply with a judicial proceeding, a court order, legal process or governmental investigation, or if we have a good faith belief that it is necessary to protect our rights or property. A request to opt out made on the Website will only apply to our use of your Personal Information collected on the Website and not to uses of your Personal Information that is obtained by us through other sources.

We may make Personal Information available (under an obligation to keep the Personal Information confidential) to a prospective or successor owner, buyer or operator of the Company or the Property. In the event of a merger, asset sale, reorganization, restructuring, liquidation, bankruptcy proceeding or similar transaction involving the Property, the Company's or the Websites, and we may share, sell, or otherwise transfer your information to such owner, buyer or operator of the Company or the Property.

We do not share your Personally Identifiable Information including email address with third parties for their promotional purposes, except as noted below.

Aggregate Information (non-personally identifiable)

We may combine non-personally identifiable information supplied by our users, such as geographic or other generic information, and use such information to describe our user base, without reference to any specific individual information, to our potential partners, investors and advertisers. We will not link this statistical information to any user's Personal Information that can identify such user as an individual.

Third Party Providers

We use credit card processing companies to bill users for goods and services purchased on the Website. We may also from time to time use unaffiliated third parties to perform various functions related to our website management, including many of the activities described in this Privacy Policy. None of these third parties is authorized to use personally identifiable information for any purpose for which the Company does not use such information. The third-party providers may use aggregated non-personally identifiable information for the purposes described in this Privacy Policy, and may combine that information with other information for other

marketing purposes. Any third-party provider that uses this information for any purpose other than as described as undertaken by the Company in this Privacy Policy has provided a link (listed elsewhere in this policy) to permit you to opt out of this use.

Credit Card Companies

When you purchase goods or services with a credit card, we may share your information with credit card companies. We may use a third party a service provider to help us gather and analyze information about our customers. The third-party service provider's only role is to help us conduct our business and deliver the most relevant products and services. If you would like to deactivate our ability to analyze your anonymous browsing and purchase behavior through the use of this service or find out more about our service provider, including its privacy policy and how to opt out, or to unsubscribe to our services, contact us using our online Customer Support form.

Access to Your Information

If you would like to modify or request deletion of your Personal Information including email address that you have provided to us through our website or mobile applications, you may do so by emailing privacy@aimhosp.com. We will respond to all access requests within 30 days.

All Personal Information collected from you, with your permission for purposes of making a reservation at one of our hotels, may be accessed and modified by contacting the hotel where your reservation is held.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Choice/Opt-out

We share email activity data with select marketing companies to help them better target email deployments sent on behalf of their clients. While those select marketing companies may have access to email addresses and email activity, and may share bulk/non-specific activity data, no email addresses or specific email activity are shared with other third parties. Should a consumer wish to opt out of this sharing, that consumer needs to opt out of email communications from us.

To opt out of targeted advertisements delivered by our advertising delivery partners, email us at unsubscribe@aimhosp.com.

Our customers and visitors are given the opportunity to 'opt-out' of receiving our electronic newsletter and promotional communications by notifying us via Email. To opt-out of receiving these types of communications, you can unsubscribe by clicking on the unsubscribe link at the bottom of the emails. On the unsubscribe page, click 'unsubscribe' to be removed from email campaigns.

If you do opt out, we will use your personal information only (a) as necessary to respond to your inquiry, and make a record of it; (b) as necessary to provide any goods or services, including hotel reservations that you have specifically requested, and to make records of these transactions; and (c) for inclusion in statistical or demographic profiles that we use for general marketing purposes. Although personally identifiable information is used to compile the profiles, we use the profiles only as aggregate data, without reference to personally identifiable information.

Links to Other Sites

The Websites provide links to third party websites. When you click on one of these links, you are leaving the Website and entering another website that we do not control and for which we cannot be responsible. You should carefully review the privacy statements or policies on any other website that you visit because those privacy statements or policies will apply to your visit to that website and may be very different from our policy.

Data Outside EU

By submitting information to us through the Website or otherwise, you acknowledge that you are sending your data outside the European Economic Area (“EEA”), including to the United States, and we do not intend to store that data inside the EEA.

We share your Personal data within the Affiliated Group. We ensure your Personal data is protected by requiring all our group companies to follow the same rules when processing your Personal data.

Many of our external third parties are based outside the EEA so their processing of your Personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

How Long Will You Use My Personal Data For?

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for seven years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

Your Legal Rights

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove Personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your Personal data. This enables you to ask us to suspend the processing of your Personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Please send an email to privacy@aimhosp.com if you wish to exercise any of the above rights.

Policy Changes

The Company reserves the right to modify the terms or conditions of this Privacy Policy or email practices at any time without prior notice or warning. Changes to this Privacy Policy will be made here on our "Online Privacy" page. You should periodically revisit this Privacy Policy to see if any modifications have been made.

If we make material changes in our information and email collection and use practices, we will notify you by means of a notice on the Website home page.

Contact Information

If you still have questions about our Privacy Policy, please contact us using the online Customer Support form. You may also contact us at privacy@aimhosp.com.