

**Menin Hospitality  
Privacy Policy**

**BY USING OR ACCESSING THIS WEBSITE, YOU ARE ACCEPTING THE PRACTICES DESCRIBED IN THIS PRIVACY POLICY.**

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## **GENERAL**

Menin Hotels, LLC (“Company” or “we” or “us” or “our”) and its subsidiaries, parents and affiliated companies (“Menin”, “Company”) respects the privacy of its users (“User” or “you”) that use our website located at [www.shelborne.com](http://www.shelborne.com), including other media forms, media channels, mobile website or mobile application related or connected thereto (collectively, the “Website”). The following privacy policy (“Privacy Policy”) is designed to inform you, as a user of the Website, about the types of information that the Company may gather about or collect from you in connection with your use of the Website. It also is intended to explain the conditions under which Company uses and discloses that information, and your rights in relation to that information. Changes to this Privacy Policy are discussed at the end of this document. Each time you use the Website, however, the current version of this Privacy Policy will apply. Accordingly, each time you use the Website you should check the date of this Privacy Policy (which appears at the end of this document) and review any changes since the last time you used the Website.

The Website is hosted in the United States of America and is subject to U.S. state and federal law. If you are accessing our Website from other jurisdictions, please be advised that you are transferring your personal information to us in the United States, and by using our Website, you consent to that transfer and use of your personal information in accordance with this Privacy Policy. You also agree to abide by the applicable laws of applicable states and U.S. federal law concerning your use of the Website and your agreements with us. Any persons accessing our Website from any jurisdiction with laws or regulations governing the use of the Internet, including personal data collection, use and disclosure, different from those of the jurisdictions mentioned above may only use the Website in a manner lawful in their jurisdiction. If your use of the Website would be unlawful in your jurisdiction, please do not use the Website.

From time to time, we may want to contact you with information about announcements, Website updates, and special offers. We also may want to contact you with information about products and services from our business partners. You may opt out of such communications at any time by clicking the “unsubscribe” link found within the Company’s emails and changing your contact preferences. If you have an account on our Website you may continue to receive transactional messages related to our services, even if you unsubscribe from promotional emails.

For EEA users: We only send marketing communications to users located in the EEA with your prior consent. Please see the section “For EEA users” below.

## **GATHERING, USE AND DISCLOSURE OF NON-PERSONALLY-IDENTIFYING INFORMATION**

### **Users of the Website Generally**

“Non-Personally-Identifying Information” is information that, without the aid of additional information, cannot be directly associated with a specific person. “Personally-Identifying Information,” by contrast, is information such as a name or email address that, without more, can be directly associated with a specific person. Like most website operators, the Company gathers from users of the Website Non-Personally-Identifying Information of the sort that web browsers, depending on their settings, may make available. That information includes the user’s Internet Protocol (IP) address, operating system, browser type and the locations of the websites the user views right before arriving at, while navigating and immediately after leaving the Website, as more fully described herein. Although such information is not Personally-Identifying Information, it may be possible for Company to determine from an IP address a user’s Internet service provider and the geographic location of the visitor’s point of connectivity as well as other statistical usage data. Company may analyze Non-Personally-Identifying Information gathered from users of the Website to help the Company better understand how the Website is being used. By identifying patterns and trends in usage, Company is able to better design the Website to improve users’ experiences, both in terms of content and ease of use. From time to time, Company may also release the Non-Personally-Identifying Information gathered from Website users in the aggregate, such as by publishing a report on trends in the usage of the Website.

## **User Content**

We also collect User Content. “User Content” is defined as all text, documents, or other content or information uploaded, entered, or otherwise transmitted by you to us in connection with your use of the Website.

## **Automatically Collected Information**

Certain data about the devices you use to connect with our Website and your use of the Website are automatically logged in our systems, including:

*Mobile Device Information.* If you use a mobile device to access the Website or download any of our applications, we may collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.

*Log data.* As with most websites and technology services delivered over the internet, our servers automatically collect data when you access or use our Website and record it in log files. This log data may include the IP address, browser type and settings, the date and time of use, information about browser configuration, language preferences, and cookie data.

*Usage information.* This is information about the Website and how you use it. We may also obtain data from our third-party partners and service providers to analyze how users use our Website. For example, we will know how many users access a specific page on the Website

and which links they clicked on. We use this aggregated information to better understand and optimize the Site.

*Device information.* These are data from your computer or mobile device, such as the type of hardware and software you are using (for example, your operating system and browser type), as well as unique device identifiers for devices that are using our software.

*Web Cookies.* Data obtained from cookies are described below and in our [Cookie Policy](#).

## **Web Cookies**

Web Cookies are small text files stored on your device and used by web browsers to deliver personalized content and remember logins and account settings. The Company uses Web Cookies and similar technologies, including tracking pixels and web beacons, to collect usage and analytic data that helps us provide our Website to you, as well as to help deliver ads for relevant products and services to you when you visit certain pages on the Website and then visit certain third-party sites. For more information on cookies and how the Company uses them, please see our [Cookie Policy](#).

WEBSITE USERS WHO DO NOT WISH TO HAVE WEB COOKIES PLACED ON THEIR COMPUTERS SHOULD SET THEIR BROWSERS TO REFUSE WEB COOKIES BEFORE ACCESSING THE WEBSITE, WITH THE UNDERSTANDING THAT CERTAIN FEATURES OF THE WEBSITE MAY NOT FUNCTION PROPERLY WITHOUT THE AID OF WEB COOKIES. WEBSITE USERS WHO REFUSE WEB COOKIES ASSUME ALL RESPONSIBILITY FOR ANY RESULTING LOSS OF FUNCTIONALITY.

## **Web Beacons**

A “Web Beacon” is an object that is embedded in a web page or email that is usually invisible to the user and allows website operators to check whether a user has viewed a particular web page or an email. Company may use Web Beacons on the Website and in emails to count users who have visited particular pages, viewed emails and to deliver co-branded services. Web Beacons are not used to access users’ Personally-Identifying Information. They are a technique that the Company may use to compile aggregated statistics about Website usage. Web Beacons collect only a limited set of information, including a number, time and date of a page or email view and a description of the page or email on which the Web Beacon resides. You may not decline Web Beacons. However, they can be rendered ineffective by declining all Web Cookies or modifying your browser setting to notify you each time a Web Cookie is tendered, permitting you to accept or decline Web Cookies on an individual basis.

## **Analytics**

We may use third-party vendors, including Google, who use first-party Web Cookies (such as the Google Analytics cookie) and third-party Web Cookies (such as the DoubleClick cookie) together to inform, optimize and serve ads based on your past activity on the Website, including Google Analytics for Display Advertising. The information collected may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. If you do not want any information to be collected and used by Google Analytics, you can install an opt-out in your web browser (<https://tools.google.com/dlpage/gaoptout/>) and/or opt out from Google Analytics for Display Advertising or the Google Display Network by using Google's Ads Settings ([www.google.com/settings/ads](http://www.google.com/settings/ads)). More information on Web Cookies can be found in our Web Cookie Policy.

### **Aggregated and Non-Personally-Identifying Information**

We may share aggregated and Non-Personally Identifying Information we collect under any of the above circumstances. We may also share it with third parties and our affiliate companies to develop and deliver targeted advertising on the Website and on websites of third parties. We may combine Non-Personally Identifying Information we collect with additional Non-Personally Identifying Information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis. For example, we may tell our advertisers the number of visitors to the Website and the most popular features or services accessed. This information does not contain any Personally-Identifying Information and may be used to develop website content and services that we hope you and other users will find of interest and to target content and advertising.

### **Additional Terms for Mobile Device Users**

#### **Geo-Location Information.**

Unless we have received your prior consent, we do not access or track any location-based information from your mobile device at any time while downloading or using our mobile application or our services, except that it may be possible for Company to determine from an IP address the geographic location of your point of connectivity, in which case we may gather and use such general location data.

#### **Push Notifications.**

We send you push notifications if you choose to receive them, letting you know when someone has sent you a message or for other service-related matters. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

### **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 where the application was downloaded from. We do not link the information we store within the analytics software to any Personally-Identifying Information you submit within the mobile application.

### **Social Media**

We may use hyperlinks on the Website which will redirect you to a social network if you click on the respective link. However, when you click on a social plug-in, such as Facebook's "Like" button, Twitter's "tweet" button or the Google+, that particular social network's plugin will be activated and your browser will directly connect to that provider's servers. If you do not use these buttons, none of your data will be sent to the respective social network's plugin provider. So for example, when you click on the Facebook's "Like" button on the Website, Facebook will receive your IP address, the browser version and screen resolution, and the operating system of the device you have used to access the Website. Settings regarding privacy protection can be found on the websites or applications of these social networks and are not within our control.

## **COLLECTION, USE AND DISCLOSURE OF PERSONALLY-IDENTIFYING INFORMATION**

### **Website Registration**

As defined above, Personally-Identifying Information is information that can be directly associated with a specific person. Company may collect a range of Personally-Identifying Information from and about Website users. Much of the Personally-Identifying Information collected by Company about users is information provided by users themselves when (1) registering for our service, (2) logging in with social network credentials, (3) participating in polls, contests, surveys or other features of our service, or responding to offers or advertisements, (4) communicating with us, (5) creating a public profile or (6) signing up to receive newsletters. That information may include each user's name, address, email address and telephone number, and, if you transact business with us, financial information such as your payment method (valid credit card number, type, expiration date or other financial information). We also may request

information about your interests and activities, your gender, age, date of birth, username, hometown and other demographic or relevant information as determined by the Company from time to time. Users of the Website are under no obligation to provide Company with Personally-Identifying Information of any kind, with the caveat that a user's refusal to do so may prevent the user from using certain Website features. BY REGISTERING WITH OR USING THE WEBSITE, YOU CONSENT TO THE USE AND DISCLOSURE OF YOUR PERSONALLY-IDENTIFYING INFORMATION AS DESCRIBED IN THIS "COLLECTION, USE AND DISCLOSURE OF PERSONALLY-IDENTIFYING INFORMATION" SECTION.

## **Company Communications**

We may occasionally use your name and email address to send you notifications regarding new services offered by the Website that we think you may find valuable. We may also send you service-related announcements from time to time through the general operation of the Website. Generally, you may opt out of such emails at the time of registration or through your account settings, if available, though we reserve the right to send you notices about your account, such as service announcements and administrative messages, even if you opt out of all voluntary email notifications.

## **Company Disclosures**

Company will disclose Personally-Identifying Information under the following circumstances:

### ***A. By Law or to Protect Rights.***

When we believe disclosure is appropriate, we may disclose Personally-Identifying Information in connection with efforts to investigate, prevent or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of Company, our users, our employees or others; to comply with applicable law or cooperate with law enforcement; to enforce our agreements or policies, in response to a subpoena or similar investigative demand, a court order or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases, we may raise or waive any legal objection or right available to us.

### ***B. Marketing Communications.***

Unless users opt-out from receiving Company marketing materials upon registration, Company may email users about products and services that Company believes may be of interest to them. If you wish to opt-out of receiving marketing materials from Company, you may do so by following the unsubscribe link in the email communications, by going to your account settings (if applicable) or contacting us using the contact information below.

### ***C. Third-Party Service Providers.***

We may share your Personally-Identifying Information, which may include your name and contact information (including email address) with our authorized service providers that perform certain services on our behalf. These services may include fulfilling orders, providing customer service and marketing assistance, performing business and sales analysis, supporting the Website's functionality and supporting contests, sweepstakes, surveys and other features offered through the Website. We may also share your name, contact information and credit card information with our authorized service providers who process credit card payments. These service providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purpose.

### ***D. Business Transfers; Bankruptcy.***

Company reserves the right to transfer all Personally-Identifying Information in its possession to a successor organization in the event of a merger, acquisition, bankruptcy or other sale of all or a portion of Company's assets. Other than to the extent ordered by a bankruptcy or other court, the use and disclosure of all transferred Personally-Identifying Information will be subject to this Privacy Policy, or to a new privacy policy if you are given notice of that new privacy policy and are given an opportunity to affirmatively opt-out of it. Personally-Identifying Information submitted or collected after a transfer, however, may be subject to a new privacy policy adopted by the successor organization.

### ***E. Changing Personally-Identifying Information; Account Termination***

You may at any time review or change your Personally-Identifying Information by going to your account settings (if applicable) or contacting us using the contact information below. Upon your request, we will deactivate or delete your account and contact information from our active databases. Such information will be deactivated or deleted as soon as practicable based on your account activity and accordance with our deactivation policy and applicable law. To make this request, either go to your account settings (if applicable) or contact us as provided below. We will retain in our files some Personally-Identifying Information to prevent fraud, to troubleshoot problems, to assist with any investigations, to enforce our to comply with legal requirements as is permitted by law. Therefore, you should not expect that all your Personally-Identifying



Information will be completely removed from our databases in response to your requests. Additionally, we keep a history of changed information to investigate suspected fraud with your account.

## **General Use**

The Company uses the Personally-Identifying Information in the file we maintain about you, and other information we obtain from your current and past activities on the Website (1) to deliver the products and services that you have requested; (2) to manage your account and provide you with customer support; (3) to communicate with you by email, postal mail, telephone and/or mobile devices about products or services that may be of interest to you either from us, our affiliate companies or other third parties; (4) to develop and display content and advertising tailored to your interests on the Website and other sites; (5) to resolve disputes and troubleshoot problems; (6) to measure consumer interest in our services; (7) to inform you of updates; (8) to customize your experience; (9) to detect and protect us against error, fraud and other criminal activity; (10) to enforce our [Terms of Use](#); and (11) to do as otherwise described to you at the time of collection. At times, we may look across multiple users to identify problems. In particular, we may examine your Personally-Identifying Information to identify users using multiple user IDs or aliases. We may compare and review your Personally-Identifying Information for accuracy and to detect errors and omissions. We may use financial information or payment method to process payment for any purchases made on the Website, enroll you in the discount, rebate, and other programs in which you elect to participate, to protect against or identify possible fraudulent transactions and otherwise as needed to manage our business.

## **Collection and Use of Information by Third Parties Generally**

Company contractually prohibits its contractors, affiliates, vendors and suppliers from disclosing Personally-Identifying Information received from Company, other than in accordance with this Privacy Policy. However, third parties are under no obligation to comply with this Privacy Policy with respect to Personally-Identifying Information that users provide directly to those third parties, or that those third parties collect for themselves. These third parties include advertisers, providers of games, utilities, widgets and a variety of other third-party applications accessible through the Website. Company neither owns nor controls the third-party websites and applications accessible through the Website. Thus, this Privacy Policy does not apply to information provided to or gathered by the third parties that operate them. Before visiting a third party, or using a third-party application, whether by means of a link on the Website, directly through the Website or otherwise, and before providing any Personally-Identifying Information to any such third party, users should inform themselves of the privacy policies and practices (if any) of the third party responsible for that website or application, and should take those steps necessary to, in those users' discretion, protect their privacy.

## **Security**

We take the security of your Personally-Identifying Information seriously and use reasonable electronic, personnel and physical measures to protect it from loss, theft, alteration or misuse. However, please be advised that even the best security measures cannot fully eliminate all risks. We cannot guarantee that only authorized persons will view your information. We are not responsible for third-party circumvention of any privacy settings or security measures.

We use industry-standard encryption to protect your data in transit. This is commonly referred to as transport layer security (“TLS”) or secure socket layer (“SSL”) technology. Once we receive your data, we protect it on our servers using a combination of technical, physical, and logical security safeguards. The security of the data stored locally in any of our software installed on your computing device requires that you make use of the security features of your device. We recommend that you take the appropriate steps to secure all computing devices that you use in connection with our Website and services.

We are dedicated to protecting all information on the Website as is necessary. However, you are responsible for maintaining the confidentiality of your Personally-Identifying Information by keeping your password confidential. You should change your password immediately if you believe someone has gained unauthorized access to it or your account. If you lose control of your account, you should notify us immediately.

## **Privacy Policy Changes**

Company may, in its sole discretion, change this Privacy Policy from time to time. Any and all changes to Company’s Privacy Policy will be reflected on this page and the date new versions are posted will be stated at the top of this Privacy Policy. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. Users should regularly check this page for any changes to this Privacy Policy. Company will always post new versions of the Privacy Policy on the Website. However, Company may, as determined in its discretion, decide to notify users of changes made to this Privacy Policy via email or otherwise. Accordingly, it is important that users always maintain and update their contact information when changes go into effect.

## **Children**

The Children’s Online Privacy Protection Act (“COPPA”) protects the online privacy of children under 13 years of age. We do not knowingly collect or maintain Personally-Identifying Information from anyone under the age of 13, unless or except as permitted by law. Any person

who provides Personally-Identifying Information through the Website represents to us that he or she is 13 years of age or older. If we learn that Personally-Identifying Information has been collected from a user under 13 years of age on or through the Website, then we will take the appropriate steps to cause this information to be deleted. If you are the parent or legal guardian of a child under 13 who has become a user of the Website or has otherwise transferred Personally-Identifying Information to the Website, please contact Company using our contact information below to have that child's account terminated and information deleted.

## **California Privacy Rights**

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about the Personally-Identifying Information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year. If applicable, this information would include a list of the categories of the Personally-Identifying Information that was shared and the names and addresses of all third parties with which we shared Personally-Identifying Information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to our privacy officer as listed below.

## **For EEA Users**

Individuals located in the European Economic Area (EEA) have certain rights in respect to their personal information, including the right to access, correct, or delete Personally-Identifying Information we process through your use of the Website and/or services. If you're a user based in the EEA, you can:

- Request a Personally-Identifying Information report by submitting a support ticket through your user account. This report will include the Personally-Identifying Information we have about you, provided to you in a structured, commonly used, and portable format. You must be signed into your user account to submit this request. Please note that the Company may request additional information from you to verify your identity before we disclose any information.
- Have your Personally-Identifying Information corrected or deleted. Some Personally-Identifying Information can be updated by you: You can update your name and email address, as well as language preference, through your user account settings. If you registered for the Website using Google or Facebook, or if you otherwise have problems updating this information, please contact us. You can remove your Personally-Identifying Information from the Website by deleting your user account.
- Object to us processing your Personally-Identifying Information. You can ask us to stop using your Personally-Identifying Information, including when we use your Personally-Identifying Information to send you marketing emails. We only send marketing

communications to users located in the EEA with your prior consent, and you may withdraw your consent at any time by clicking the “unsubscribe” link found within our emails and changing your contact preferences. Please note you will continue to receive transactional messages related to our services, even if you unsubscribe from marketing emails.

- Complain to a regulator. If you are based in the EEA and believe that we have not complied with data protection laws, you have a right to lodge a complaint with your local supervisory authority.

### **Do-Not-Track Policy**

Most web browsers and some mobile operating systems include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. Because there is not yet a common understanding of how to interpret the DNT signal, the Website currently does not respond to DNT browser signals or mechanisms.

### **Contact us**

If you have any questions regarding our Privacy Policy, please contact us at:

Menin Hotels, LLC  
Attn: Legal  
3050 Biscayne Blvd., PH-1, Miami, FL 33137  
Email: [bookings@meninhospitality.com](mailto:bookings@meninhospitality.com)  
Phone: (305)704-3615

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