

1. PRIVACY STATEMENT

This privacy statement (“Statement”) applies to **The Ashton Hotel** (collectively, "we," or "us"). We strive to deliver outstanding products, services, and experiences. We value your business and, more importantly, your loyalty. We recognize that privacy is an important issue. We have developed this Statement to explain our practices regarding the personal information we collect from you or about you on this site or via our apps, through written or verbal communications with us, when you visit our property, or from other sources. While this Statement broadly describes the practices we have adopted globally, local laws vary and some jurisdictions may place restrictions on our processing activities (e.g., certain jurisdictions may require affirmative consent to send marketing messages). Therefore, our actual practices in such jurisdictions may be more limited than those described herein, in order to enable us to comply with local requirements.

2. CONSENT

"Personal data" means any information collected and logged in a format that allows you to be identified personally, either directly (e.g. name) or indirectly (e.g. telephone number) as a natural person. Before providing us with this information, we recommend that you read this document describing our customer privacy protection Statement.

By using any of our products or services and/or by agreeing to this Statement, e.g. in the context of registering for any of our products or services, you agree to the collection and use of Personal Information as described in this Statement.

Please note that this Statement does not apply to our processing of personal information on behalf of and subject to the instructions of third parties other service providers, companies that organize or offer packaged travel arrangements, marketing partners, or corporate customers.

3. SCOPE OF APPLICATION

This Statement applies:

1. To all data processing implemented in our hotel,
2. To all our reservation websites.
3. Third party processors that we partner with

4. WHAT PERSONAL DATA IS COLLECTED

At various times, we will be obliged to ask you, as a customer, for information about you and/or members of your family, this may include:

- Contact details (for example, last name, first name, telephone number, email)
- Personal information (for example, date of birth, country)

- Information relating to your children (for example, first name, date of birth, age)
- Your credit card number (for transaction and reservation purposes)
- Your membership number for the loyalty program or another partner program (for example, the airline loyalty program)
- Your arrival and departure dates
- Your preferences and interests (for example, smoking or non-smoking room, preferred floor, type of bedding, type of newspapers/magazines, sports, cultural interests)
- Your questions/comments, during or following a stay in one of our establishments.

The information collected in relation to persons under 18 years of age is limited to their name, and date of birth, which can only be supplied to us by an adult. We would be grateful if you could ensure that your children do not send us any personal data without your consent (particularly via the Internet). If such data is sent, you can contact the Data Privacy department to arrange for this information to be deleted.

We do not deliberately collect sensitive information, such as information concerning race, ethnicity, political opinions, religious and philosophical beliefs, union membership, or details of health or sexual orientation.

In addition, we collect other personal information in certain cases, such as:

- *Surveys:* We may request demographic data or other personal information in customer surveys.
- *On-property Collection:* We collect additional personal information during registration/check-in at our properties, including such information as may be required by local laws. We may also use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our properties (via keycards and other technologies). We may also use closed-circuit television and other technologies that record sound or video for the protection of our staff, guests and visitors to our properties where permitted by law. In addition, we may collect personal information in connection with on-property services, such as concierge services, health clubs, spas, activities, child care services, equipment rental, and our Open Key app (where available).
- *Event Profiles:* If you plan an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organization (name, annual budget, and number of sponsored events per year). We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event in accordance with your preferences as permitted by law. If you visit us as part of an event, we may share personal information about you with the event planners, as permitted by law. If you are an event planner we may also share information about your event with third-party service providers who may market event services to you as permitted by law.
- *Social Media:* If you choose to participate in Hotel-sponsored social media activities or offerings, we may collect certain information from your social media account consistent

with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. We may also allow you to enter into contests to provide photos, such as of your stay with us, which you may share with your connections on social media for votes, shared offers or other promotions.

- *Forward-to-a-Friend:* From time to time, we may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend, whether via the Internet, a stand-alone kiosk or mobile device. If you choose to use this feature, we will ask you for the recipient's name and email address, along with the text of any message you choose to include. By using this feature, you represent that you are entitled to use and provide us with the recipient's name and email address for this purpose.

In addition to the information we collect from you directly, we may also infer information about you based on the information you provide to us or from Other Information we collect.

5. SENSITIVE INFORMATION

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the purpose of unique identification. We do not generally collect sensitive information unless it is volunteered by you. We may use health data provided by you to serve you better and meet your particular needs (for example, the provision of disability access).

Moreover, depending on applicable local laws, other information could be considered sensitive, such as your credit card number, your leisure activities, personal activities and hobbies, and whether or not you are a smoker. We may be obliged to collect such information in order to meet your requirements or provide you with an appropriate service, such as a specific diet.

In this case, depending on the laws in force in certain countries, your prior consent may be required with regard to the collection of sensitive information.

6. WHEN YOUR PERSONAL DATA IS COLLECTED

Personal data may be collected on a variety of occasions, including:

1. Hotel activities:
 - Booking a room
 - Checking-in and paying
 - Eating/drinking at the hotel bar or restaurant during a stay
 - Requests, complaints and/or disputes.
2. Participation in marketing programs or events:
 - Signing up for loyalty programs
 - Participation in customer surveys (for example, the Guest Satisfaction Survey)
 - Online games or competitions
 - Subscription to newsletters, in order to receive offers and promotions via email.

3. Transmission of information from third parties:
 - Tour operators, travel agencies, GDS reservation systems, and others
4. Internet activities:
 - Connection to our websites (IP address, cookies)
 - Online forms (online reservation, questionnaires, Hotel pages on social networks, network login devices such as Facebook login etc.).

7. FOR WHAT PURPOSES DO WE COLLECT DATA

We collect your personal data for the purposes of:

1. Meeting our obligations to our customers.
2. Managing the reservation of rooms and accommodation requests:
 - Creation and storage of legal documents in compliance with accounting standards.
3. Managing your stay at the hotel:
 - Monitoring your use of services (telephone, bar, pay TV etc.)
 - Managing access to rooms
 - Internal management of lists of customers having behaved inappropriately during their stay at the hotel (aggressive and anti-social behavior, non-compliance with the hotel contract, non-compliance with safety regulations, theft, damage and vandalism, or payment incidents).
4. Improving our hotel service, especially:
 - Processing your personal data in our customer marketing program in order to carry out marketing operations, and gain a better understanding of your requirements and wishes
 - Adapting our products and services to better meet your requirements
 - Customizing commercial offers and the promotional messages we send to you
 - Informing you of special offers and any new services
5. Managing our relationship with customers before, during and after your stay:
 - Managing the loyalty program
 - Providing details for the customer database
 - Segmentation operations based on reservation history and customer travel preferences with a view to sending targeted communications
 - Predicting and anticipating future behaviors
 - Developing statistics and commercial scores, and carrying out reporting
 - Providing context data for the offer push tool when a customer visits a Group website or makes a reservation
 - Knowing and managing the preferences of new or repeat customers
 - Sending you newsletters, promotions and tourist, hotel or service offers, or offers from our partners, or contacting you by telephone
 - Managing requests to unsubscribe from newsletters, promotions, tourist offers and satisfaction surveys
 - Taking into account the right to object
 - Using a dedicated telephone service to search for persons staying in our hotels in the event of serious events affecting the hotel in question (natural disasters, terrorist attacks etc.).

6. Use a trusted third party to cross-check, analyze and apply certain devices to your collected data at the time of booking or at the time of your stay, in order to determine your interests and your customer profile, and to allow us to send you personalized offers.
7. Improving services, especially:
 - Carrying out surveys and analyses of questionnaires and customer comments
 - Managing claims/complaints
 - Offering you the benefits of our loyalty program.
8. Securing and enhancing your use of our websites, especially:
 - Improving navigation
 - Implementing security and fraud prevention.
9. Conforming to local legislation (for example, storing of accounting documents).

8. CONDITIONS OF THIRD-PARTY ACCESS TO YOUR PERSONAL DATA

a. In order to offer you the best service, we can share your personal data and give access to authorized personnel, including:

- Hotel staff
- Reservation staff using our reservation tools
- IT departments
- Commercial partners and marketing services
- Medical services if applicable
- Legal services if applicable
- Generally, any appropriate person within the Hotel family for certain specific categories of personal data.

b. With service providers and partners: your personal data may be sent to a third party for the purposes of supplying you with services and improving your stay, for example:

1. External service providers: IT sub-contractors, international call centers, banks, credit card issuers, external lawyers, dispatchers, printers.
2. Commercial partners: We may, unless you specify otherwise to the Data Privacy department, enhance your profile by sharing certain personal information with preferred commercial partners. In this case, a trusted third party may cross-check, analyze and apply certain devices to your data. This data processing will allow us and our privileged contractual partners to determine your interests and your customer profile, and will allow us to send you personalized offers.
3. Social networking sites: In order to allow you to be identified on the website without the need to fill out a registration form, we may elect to put the Facebook login system in place. If you log in using the Facebook login system, you explicitly authorize us to access and store the public data on your Facebook account, as well as the other data mentioned during use of the Facebook login system. We may also communicate your email address

to Facebook in order to identify whether you are already a Facebook user, in order to post personalized and relevant ads on your Facebook account if appropriate.

4. **Links to Third-Party Websites and Services:** Our site and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.
5. We may also partner with a limited number of Internet providers to offer Internet access to our guests. Your use of on-property Internet service is subject to the third-party Internet provider's terms of use and privacy policy. You can access those terms and policies using the links on the service sign-in page, or by visiting the Internet provider's website.

c. **Local authorities:** We may also be obliged to send your information to local authorities if this is required by law or as part of an inquiry and in accordance with local regulations.

9. DATA SECURITY

We take appropriate technical and organizational measures, in accordance with applicable legal provisions, to protect your personal data against illicit or accidental destruction, accidental alteration or loss, and unauthorized access or disclosure. To this end, we have taken technical measures (such as firewalls) and organizational measures (such as a user ID/password system, means of physical protection etc.).

When you submit credit card data when making a reservation, SSL (Secure Socket Layer) encryption technology is used to guarantee a secure transaction.

10. COOKIES

Use of cookies by us

You are advised that the company uses cookies or other tracers on its online booking site ("Website").

These tracers may be installed on your device depending on the preferences that you expressed or may express at any time in accordance with this Statement.

1. Why have a cookies policy?

With a view to provide information and ensure transparency, we established this policy so that you can learn more about:

- The origin and purpose of the information processed when you browse our Website
- Your rights with regard to cookies and other tracers used by us

2. What is a cookie?

Cookies and other similar tracers are packets of data used by servers to send status information to a user's browser and return status information to the original server through this same browser.

The status information can be a session identifier, a language, an expiration date, a response field or other types of information.

During their validity period, cookies are used to store status information when a browser accesses various pages of a website or when the browser returns to this website at a later point.

There are different types of cookies:

- Session cookies, which are deleted as soon as you exit the browser or leave the website
- Persistent cookies, which remain on your device until their expiration or until you delete them using the features of your browser

3. Why use cookies?

We use cookies and other tracers primarily for the following purposes:

Cookies strictly necessary for browsing the Websites and the ability to use all of their features, and intended in particular to:

- Manage authentication of website visitors and the associated security measures, and ensure proper functioning of the authentication module
- Optimize the user experience and facilitate browsing, in particular determining "technical routes" for browsing
- Store information regarding the "cookies" information banner seen by website visitors who then continue to browse the website after agreeing to accept cookies on their device
- Implement security measures (for example, when you are asked to log in again for content or a service after a certain period of time, or to ensure basic operation of the Website and use of their major technical features, such as monitoring of performance and browsing errors, management of user sessions, etc.)

Cookies for features intended in particular to:

- Adapt the Website to the display preferences of your device (language, currency, display resolution, operating system used, configuration and settings of the display of web pages based on the device you are using and its location, etc.)
- Store specific information that you enter on the Website in order to facilitate and customize your subsequent visits (including displaying the visitor's first and last names if the visitor has a user account)
- Allow you to access your personal pages more quickly by storing the login details or information that you previously entered

Cookies for visitor tracking are aimed at improving the comfort of users by helping us understand your interactions with the Website (most visited pages, applications used, etc.); these cookies may collect statistics or test different ways of displaying information in order to improve the relevance and usability of our services.

Advertising cookies are intended to (i) offer you, in advertising spaces, relevant, targeted content that may be of interest to you (best offers, other destinations, etc.) based on your interests, browsing behavior, preferences, and other factors, and (ii) reduce the number of times that the advertisements appear.

Affiliate cookies identify the third-party website that redirected a visitor to the Website.

Social network cookies, set by third parties, allow you to share your opinion about and content from the Website on social networks (for example, the "Share" or "Like" application buttons for social networks).

The social network applications on the Website as mentioned above can in some cases allow the social networks concerned to identify you even if you did not click on the application button. This type of button can allow a social network to track your browsing on the Website, simply because your account in the social network concerned is enabled on your device (open session) while you are browsing.

We recommend that you read the policies of these social networks to familiarize yourself with how they use the browsing information they may collect, especially with regard to advertising. These policies must specifically allow you to make choices on these social networks, particularly by configuring your user accounts for each of them.

4. Consent

The installation of certain cookies is subject to your consent. Also, when you first visit the Website, you are asked whether you agree to the installation of this type of cookie, which is only activated after your acceptance.

This process is supported by means of an information banner on the home page of the Website, which informs you that by continuing to browse, you are agreeing to the installation of cookies that require consent on your device.

You can change your mind at any time using the various methods described in section "Deleting and/or blocking cookies".

5. Deleting and/or blocking cookies

You have several options for deleting cookies and other tracers.

Browser settings

Although most browsers are set by default to accept cookies, you can, if you desire, choose to accept all cookies, always block cookies, or choose which cookies to accept based on their senders.

You can also set your browser to accept or block cookies on a case-by-case basis before they are installed. Your browser also allows you to regularly delete cookies from your device. Remember to configure all the browsers in your different devices (tablets, smartphones, computers, etc.).

Regarding management of cookies and your preferences, configuration varies for each browser. This is described in the Help menu of your browser, as well as how to edit your preferences with regard to cookies. For example:

- For Internet Explorer™: <http://windows.microsoft.com/en-US/windows-vista/Block-or-allow-cookies>
- For Safari™: <http://www.apple.com/legal/privacy/en-ww/cookies>
- For Chrome™: <http://support.google.com/chrome/bin/answer.py?hl=en&hlrm=en&answer=95647>
- For Firefox™: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- For Opera™: <http://help.opera.com/Windows/10.20/en/cookies.html>

Saving a cookie to your device depends on your wishes, which you can exercise and change at any time and free of charge using the settings offered by your browser software.

If your browser is set to accept cookies on your device, the cookies embedded in the pages and content that you view may be temporarily stored in a dedicated space on your device. They can only be read by their issuer.

However, you can set your browser to block cookies. Keep in mind that if you set your browser to block cookies, some features, pages and spaces on the Website will not be accessible, and we cannot be held responsible in this case.

Specialized advertising platforms

Several professional advertising platforms also give you the option to accept or block cookies used by companies that are members. These centralized mechanisms do not block the display of ads; they simply prevent the installation of cookies that tailor ads to your interests.

For example, you can visit the website <http://www.youronlinechoices.com> to prohibit the installation of these cookies on your device.

11. STORAGE OF DATA

We retain your personal data only for the period necessary for the purposes set out in this Statement or in accordance with the provisions of applicable law.

12. ACCESS AND MODIFICATION

You have the right to access your personal data collected by us and to modify it subject to applicable legal provisions.

You may also exercise your right to object by writing to the address below.

In the event of difficulty exercising your rights, please contact us by writing to the address below:

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request. You will be asked to provide your name, address, email, phone number(s) as well as the date(s) of your stay with your request.

If your personal data is inaccurate, incomplete or not up to date, please send the appropriate amendments to the Data Privacy department

All requests will receive a response as swiftly as possible and in accordance with applicable law.

Contact:

Remington Hotels

14185 Dallas Parkway, Suite 1150

Dallas, Texas 75254

Attn: Data Privacy Department

13. CHOICES – MARKETING COMMUNICATIONS

If you have given us your contact information (mail address, fax number, email address or phone number), we may want to inform you in accordance with any preferences you have expressed, and with your consent where required, about our products and services or invite you to events via email, online advertising, social media, telephone, text message (including SMS and MMS), push notifications, in-app alerts, postal mail, our customer service call center, and other means (including on-property messaging, such as your in-room television).

If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe function in the email you receive from us. Opt-out requests can take up to ten business days to be effective.

To opt out of text messages, reply “STOP” to the message you received.

You may control whether our mobile apps send you push notifications by changing your notification settings on your mobile device. If we engage in sending you in-app messages, we will allow control for those in our apps' settings. For more information about cookies and interest-based advertising and to learn about how to manage these technologies, please see Section 10: Cookies

14. UPDATES

We may modify this Statement from time to time. Consequently, we recommend that you consult it regularly, particularly when making a reservation.

15. QUESTIONS AND CONTACTS

For any questions concerning our Privacy Statement, please contact:

Remington Hotels

14185 Dallas Parkway, Suite 1150

Dallas, Texas 75254

Attn: Data Privacy Department