

# PRIVACY POLICY FOR SCHULTE HOSPITALITY GROUP, INC.

Effective Date: January 1, 2020

Last Updated: January 6, 2020

## Who We Are

This is the Schulte Hospitality Group, Inc. (the "Company") Internet Privacy Policy. You can write to us at 2000 High Wickham Place, Suite 300 Louisville, KY 40245. We can be reached by email at [CAPrivacyRequest@SchulteHospitality.com](mailto:CAPrivacyRequest@SchulteHospitality.com), or you can call us at (502) 489-3737.

The Company values individual privacy and we want to give our website visitors the opportunity to know what information we collect about them and how they can limit the use of personally-identifiable information beyond the purposes for which they first provided it. At all times, however, the Company reserves the right to disclose information where required by law or to comply with valid legal process (such as a search warrant, subpoena or court order), to protect the Company's rights or property, including without limitation in the event of a transfer of control of the Company or substantially all of its assets, or during emergencies when safety is at risk.

Whenever we change our policy, we will give reasonable notice by posting a notice on our home page. Since these policy change notices last only for a limited time, however, you should check this Privacy Policy regularly to see if there have been any changes. To view our Privacy Policy at any time go to <https://schultehotels.com/privacy>.

## Data We Collect and How We Use It

### Personally Identifiable Information

We collect your email address if you communicate with us by email, as well as other information that you might supply voluntarily, such as survey information.

We may use this information to respond to an email or other inquiry or request, to help improve our website and our services, to customize your experience at our website, or to send updates or notices about our organization and the products we offer that we think may be of interest to you. We may also combine this information with other generally or publicly available information to help us identify visitors' preferences or interests. We may provide information that identifies you to companies that assist us in these activities, such as helping us fulfill your request for a product, service or information.

Further, with your express approval, the Company may occasionally provide, sell, or rent limited data to third parties, including companies that offer products and services for sale to you.

## Children's Privacy

The Company's website is intended for adults. The Company does not knowingly collect personal information from children under the age of 13. If the Company obtains knowledge that it has personally identifiable information about a child under 13 in retrievable form in its files, the Company will delete that information from our existing files.

## Cookies & Computer-Related Information

The Company does not enable "cookies" on our website with one exception. A cookie is used in website system administration to keep track of movement of an individual user from one screen to another. This information may be used by our staff to detect and resolve website problems and to assist with customer support. We do not collect any personally identifiable information about site visitors in this process.

Our web server automatically collects information from your computer and navigation patterns when you visit our site, including your Internet Protocol (IP) address, the computer's operating system, the type of browser you use, and the specific web pages visited during your connection. We may also track data such as the total number of visits to our website and the number of visitors to each page of our website.

We may use this information, in aggregate form, for system maintenance and to better understand how our visitors use our site and services so that we can make them better. The Company may also share statistical or demographic information in aggregate form with third parties for marketing or research purposes. This aggregate data will not contain any information that personally identifies you.

## How You Can Control and Update Data about You

We want to be sure that we keep only the most accurate and up-to-date information about you in our records. Therefore, whenever you believe that your contact information needs to be updated, you can email us at [CAPrivacyRequest@SchulteHospitality.com](mailto:CAPrivacyRequest@SchulteHospitality.com) to correct or update your contact information.

You may choose at any time to remove your name, telephone and fax numbers, and postal and email addresses from the lists we use to send notices or updates and elect not to receive correspondence from us by emailing at [CAPrivacyRequest@SchulteHospitality.com](mailto:CAPrivacyRequest@SchulteHospitality.com).

Users may request that the Company refrain from disclosing to third parties the data it collects on its membership application form or any other form on which users are providing information by refraining from checking the "opt-in" box that appears on each form on which a user provides information. Alternatively, users may contact the Company at [CAPrivacyRequest@SchulteHospitality.com](mailto:CAPrivacyRequest@SchulteHospitality.com).

Other Internet sites you visit - including those linked from the Company website - may have their own privacy policies or no policy at all. Other websites might use personal information differently than our policy permits. We strongly encourage you to review the privacy policies of any site before providing any personal information.

## Rights Under The California Consumer Privacy Act

The California Consumer Privacy Act (the “CCPA”), a new privacy law that provides California consumers certain rights regarding their personal information became effective on January 1, 2020. However, as of that date the California Attorney General had not completed the rule making process to establish the regulations for covered businesses to implement the law. Accordingly, we may from time-to-time update information in this and other policies regarding our data practices and your rights, modify our methods for responding to your requests, and/or supplement our response to your requests, as we continue to develop our compliance program to reflect the development of the law and our understanding of how it relates to our data practices. In the meantime, this Privacy Policy outlines the personal information we collect subject to the CCPA and our purposes for that collection.

If you are a California consumer and would like to register a request under your “right to know about personal information collected, disclosed or sold” (including your right to obtain copies of specific pieces of personal information and/or information about categories of personal information practices), your “right to request deletion of personal information,” or your “right to opt-out of the sale of personal information,” (“CCPA Rights”) you may contact us at [CAPrivacyRequest@SchulteHospitality.com](mailto:CAPrivacyRequest@SchulteHospitality.com) or you can call us at (502) 489-3737. We will respond to your request as soon as we have guidance on how to properly verify your identity and the means to respond; however, note that CCPA Rights do not apply to personal information collected from (a) job applicants, current and former employees or independent contractors, or (b) representatives of another business in connection with business communications or transactions.

## Data Integrity and Security

We use state-of-the-art technology to keep any information you provide as secure as possible. We also have in place privacy protection control contractual obligations with our vendors designed to ensure that personal data is protected from unauthorized access or disclosure. All the Company employees must abide by the Company's Privacy Policy. Only authorized employees are permitted to have access to personally-identifiable data about website visitors, and that access is limited to what is reasonably needed to perform an employee's responsibilities, such as providing updates or notices or customer service. Employees who violate our privacy policies are subject to disciplinary action, up to and including termination.

## Interest-based Advertising and Choice

We may engage and work with service providers and other third parties to serve advertisements on the service and/or on third-party services. Some of these ads may be tailored to your interests based on your browsing of the service and elsewhere on the Internet, sometimes referred to as “interest-based advertising” and “online behavioral advertising” (“Interest-based Advertising”), which may include sending you an ad on a third-party service after you have left the service (i.e., “retargeting”).

You may choose whether to receive some Interest-based Advertising by submitting opt-outs. Some of the advertisers and service providers that perform advertising-related services for us and third parties may participate in the Digital Advertising

Alliance's ("DAA") Self-Regulatory Program for Online Behavioral Advertising. To learn more about how you can exercise certain choices regarding Interest-based Advertising, visit <http://www.aboutads.info/choices/>, and <http://www.aboutads.info/appchoices> for information on the DAA's opt-out program for mobile apps.

Some of these companies may also be members of the Network Advertising Initiative ("NAI"). To learn more about the NAI and your opt-out options for their members, see <http://www.networkadvertising.org/choices/>. Please be aware that, even if you are able to opt out of certain kinds of Interest-based Advertising, you may continue to receive other types of ads.

Opting out only means that those selected members should no longer deliver certain Interest-based Advertising to you but does not mean you will no longer receive any targeted content and/or ads (e.g., from other ad networks). Also, if your browsers are configured to reject cookies when you visit these opt-out webpages, or you subsequently erase your cookies, use a different device or web browser or use a non-browser-based method of access (e.g., mobile app), your NAI / DAA browser-based opt-out may not, or may no longer, be effective. We support the ad industry's 2009 Self-regulatory Principles for Online Behavioral Advertising (<https://www.iab.com/wp-content/uploads/2015/05/ven-principles-07-01-09.pdf>) and expect that ad networks we directly engages to serve you Interest-based Advertising will do so as well, though we cannot guarantee their compliance. We are not responsible for effectiveness of, or compliance with, any third-parties' opt-out options or programs or the accuracy of their statements regarding their programs.