

# Privacy Policy

**Effective Date:** May 25, 2018

## Scope of this Privacy Policy

We are delighted that you are visiting this website and have an interest in Interstate Hotels & Resorts. Before proceeding you should be aware of what this Privacy Policy applies to and what it does not. This website is owned and controlled by Interstate Hotels & Resorts, Inc. (“Interstate,” “we,” “our,” “Company”). It is also applicable to and may be used by the individual hotels, resorts and conference centers that we manage within the United States. This Privacy Notice explains who we are, how we collect, share and use Personal Information, and how you can exercise your privacy rights.

Interstate is an independent hotel management company. Hotel owners entrust us to operate their hotels and to provide exceptional service to guests at a [global portfolio](#) of both franchise-branded and independent hotels, resorts, conference centers.

This website contains links to websites for specific hotels that are managed by Interstate. In most instances, these websites are operated by the associated hotel brands (e.g., Hilton Worldwide, Marriott International, Inc.). This Privacy Policy applies to this website only. We are not responsible for the data collection, data use practices, privacy policy or the use of cookies or tracking technologies on hotel brand websites or other non-Interstate websites that you may access from this website or that have directed or connected you to this website.

In addition, if you choose to engage with Interstate on a social media platform such as Facebook, LinkedIn, You Tube and Google+, this activity is conducted at your own risk and without any expectation of privacy as Interstate does not control these platforms. Also, Interstate cannot control the actions of other users of any social media platform and is therefore not responsible for any content or submissions contained on such sites and platforms.

## Introduction

We understand you may have questions about how we collect and use the information that you provide to us and the privacy of your Personal Information. To be clear, by Personal Information, we mean data that could be used to identify or contact you, including, for example, your name, address, telephone number, e-mail address, or any other information that can be linked or is linkable to you.

The privacy of your Personal Information is very important to us. We respect the privacy of every individual who visits this website and provides any Personal Information to us.

If you ever have any privacy questions or concerns please contact us via email or postal mail at:

[privacy@interstatehotels.com](mailto:privacy@interstatehotels.com)

Interstate Hotels & Resorts  
Attn: Privacy Department  
4501 N. Fairfax Drive, Suite 500  
Arlington, VA 22203

If you do not agree to the collection and use of your Personal Information as described in this Privacy Policy, please do not provide us with any information and cease using this website.

## **Browsing this Website**

You may browse this website anonymously. Similar to many websites, our web server logs maintain a record of every device's Internet Protocol (IP) address, type of device you are using, and browser type (e.g., Internet Explorer, Firefox), Internet Service Provider (ISP), that accesses this website along with the date, time and length of time you spent on this website. We will not associate this information with any Personal Information about you. This information is used for website usage analysis as described in the Google Analytics section of this Privacy Policy.

*If you are a resident of a member nation of the **EUROPEAN ECONOMIC AREA (EEA)** or the **UNITED KINGDOM (UK)**, click [here](#) to learn about how we collect, share and use your Personal Information, and how you can exercise your privacy rights.*

## **Information We Collect on this Website and How We Use It**

We collect only basic Personal Information about you such as your name, e-mail address, telephone number, and any other information you choose to provide so that we may process your requests such as contacting you about hotel development opportunities. In addition, if you choose to sign-up to receive e-mail updates we will use your e-mail address to send you the requested information. All required and optional information is clearly denoted on any form presented to you.

If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

## **Cookies**

This website makes limited use of "cookie" technology. Cookies are strings of text a website stores on a user's computer. This website uses one or more persistent first party cookies to know when you are a return visitor to this website, which web pages you visited on the website and the sequence in which you accessed the web pages. Persistent cookies remain on your computer hard drive until you delete them or are otherwise removed upon expiration. First party cookies are set directly by Interstate and are not used for advertising or any other purpose than previously described. The cookies we use do not contain any Personal Information and we do not use cookies to ascertain any Personal Information about you. Cookies do not corrupt or damage your

computer, programs, or computer files. You can manage your cookie acceptance or blocking preferences and deletion through your web browser.

## **“Do Not Track” Requests/Signals**

This website does not support, nor respond to, “do not track” or similar technical requests.

## **Google Analytics**

We use [Google Analytics](#) to help us analyze how visitors use the website. The tool uses cookies to collect standard Internet log information and visitor behavior information. The information generated by the cookie about your use of this website, including your IP address, is transmitted to Google. This information is then used to evaluate visitors’ use of the website and to compile statistical reports on website activity for us. We do not use the statistical analytics tool to track or to collect any Personal Information of visitors to our website. We do not seek to link an IP address with the identity of a computer user. 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. Google’s ability to use and share information collected by Google Analytics about your visits to this website is restricted by the Google Analytics [Terms of Service](#) and the [Google Privacy Policy](#).

## **Careers at Interstate**

Interstate uses a private label database and tools hosted by a third party to collect information from individuals who wish to be considered for potential employment. Please note that there is a similar but separate Privacy Policy for the Careers web pages.

## **Sharing Your Personal Information**

We do not sell or otherwise make your Personal Information available to any third parties for their own use. We do use third parties to perform services such as (i) hosting this website and the Careers website and systems, (ii) storing Personal Information you expressly provide to us, (iii) storing and processing information about the use of this website, and (iv) sending you emails with your permission. These service providers are contractually prohibited from using any Personal Information for their own use. They were engaged to provide specific services and the use of any Personal Information they have access to will be dictated by us.

We may also share your Personal Information in the following circumstances and the receiving party will assume the rights and obligations regarding your Personal Information as described in this Privacy Policy:

- To third parties that you authorize to receive such information.

- With our subsidiaries, joint ventures, or other companies under a common control (“Affiliates”), in which case we will require our Affiliates to honor this Privacy Policy.
- In connection with or during negotiation of any merger, financing, acquisition or dissolution, transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets.

In the event of insolvency, bankruptcy, or receivership, Personal Information may also be transferred as a business asset.

In addition, we may disclose your Personal Information without your permission if we are:

- compelled by law or court order to act differently;
- required or elect to notify you of a security breach; or
- directed by a government entity to provide Personal Information to support an investigation and we believe in good faith that providing the information is necessary to investigate or protect against harmful activities to or by our customers, website visitors or property.

### **Securing Your Personal Information**

We understand that the security of your Personal Information is important. We use a variety of industry-standard administrative, technical and physical controls designed to protect your information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while we use reasonable efforts to protect your Personal Information, we cannot guarantee its absolute security.

### **Accessing Your Personal Information**

You are in control of the Personal Information that you provide to us. If you would like to access any Personal Information we maintain about you please contact us at [privacy@interstatehotels.com](mailto:privacy@interstatehotels.com).

### **Children’s Privacy**

This website is not intended for use by children and we do not knowingly collect any Personal Information from children. Anyone under the age of 13 is prohibited from using this website.

### **Legal Issues**

This is a United States website subject to laws of the United States and is not intended for users outside of North America. However, if you are located outside of North America, by visiting the website and providing us with Personal Information, you acknowledge and agree that your Personal Information may be processed for the purposes identified in this Privacy Policy. In addition, your Personal Information may be processed in the country in which it was collected and in other countries, including the United States, where laws regarding processing of Personal Information may be less stringent than the laws in your country. By providing your Personal

Information you consent to such transfer. However, if you are a resident of a member nation within the **European Economic Area** or the **United Kingdom**, click [here](#) to learn about how we collect, share and use your Personal Information, and how you can exercise your privacy rights.

If you reside in the State of California, you have the right to request from us a list of third parties with whom we shared Personal Information about you for their own direct marketing purposes during the previous calendar year. Please note, however, we do not share Personal Information with unrelated third parties for their own use. If you have any questions, please contact us at [privacy@interstatehotels.com](mailto:privacy@interstatehotels.com).

## **Changes to this Privacy Policy**

We may change this Privacy Policy over time. When changes are made we will post the effective date of the changes in the Privacy Policy and provide a link to the previous version so that you may review any changes.

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### ***For EEA or United Kingdom Residents***

As a resident of a member nation of the **European Economic Area** or the **United Kingdom**, you have particular rights concerning your Personal Information. This section of our Privacy Policy describes:

- what information we collect
- how we collect it
- how we use it
- the security measures we take concerning your Personal Information
- whether it is shared and with whom
- your rights concerning your Personal Information

## **What Personal Information does Interstate collect and why?**

We may collect your name, e-mail address, telephone number, and any other information you choose to provide so that we may process your requests such as contacting you about hotel development opportunities. All required and optional information is clearly denoted on any form that you are presented. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.

The Personal Information that we may collect about you broadly falls into the following categories:

- ***Information you provide voluntarily***

We ask you to provide certain information voluntarily. The types of information we ask you to provide, and the reasons why we ask you to provide it, include your contact details in order to

make a reservation, book or purchase one of our services, subscribe to marketing communications from us, and to submit enquiries to us.

We will also ask you to provide your credit card details so that we can charge you for any purchases that you make during your stay at the hotel. We will also collect your hotel loyalty card number so that we can communicate with the hotel to ensure that you collect points for your stay at the hotel.

If we ask you to provide any other Personal Information not described above, then the Personal Information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your Personal Information.

- *Information we collect automatically*

We may also collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered Personal Information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

- *Information we obtain from third party sources*

From time to time, we may receive Personal Information about you from third party sources (including travel agents that have made a booking on your behalf), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your Personal Information to us.

The types of information we collect from third parties include your name, address, email, credit card rewards number and stay history. We use the information we receive from these third parties to honour your reservation.

## **With whom does Interstate share my Personal Information with?**

We do not sell or otherwise make your Personal Information available to any third parties for their own use. We do use third parties to perform services such as (i) hosting this website and the Careers website and systems, (ii) storing Personal Information you expressly provide to us, (iii) storing and processing information about the use of this website, and (iv) sending you emails with your permission. These service providers are contractually prohibited from using any Personal Information for their own use. They were engaged to provide specific services and the use of any Personal Information they have access to will be dictated by us.

We may disclose your Personal Information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us, or who otherwise process Personal Information for purposes that are described in this Privacy Notice or notified to you when we collect your Personal Information;
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Information only for the purposes disclosed in this Privacy Notice;
- to any **other person with your consent** to the disclosure.
- **Google Analytics:** We use [Google Analytics](#) to help us analyze how visitors use the website. The tool uses cookies to collect standard Internet log information and visitor behavior information. The information generated by the cookie about your use of this website, including your IP address, is transmitted to Google. This information is then used to evaluate visitors' use of the website and to compile statistical reports on website activity for us. We do not use the statistical analytics tool to track or to collect any Personal Information of visitors to our website. We do not seek to link an IP address with the identity of a computer user. Google's ability to use and share information collected by Google Analytics about your visits to this website is restricted by the Google Analytics [Terms of Service](#) and the [Google Privacy Policy](#).

## **Legal basis for processing Personal Information**

Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect Personal Information from you only where we have your consent to do so, where we need the Personal Information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible consequences if you do not provide your Personal Information).

Similarly, if we collect and use your Personal Information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided under the “How to contact us” heading below.

### **Cookies and similar tracking technology**

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use Personal Information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

### **How does Interstate keep my Personal Information secure?**

We use appropriate technical and organizational measures to protect the Personal Information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Information.

### **Data retention**

We retain Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.



## Children's Privacy

This website is not intended for use by children and we do not knowingly collect any Personal Information from children. Any resident of the EEA or UK who is under the age of 16 is prohibited from using this website.

## Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your Personal Information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below.
- In addition, if you are a resident of the European Union, you can **object to processing** of your Personal Information, ask us to **restrict processing** of your Personal Information or **request portability** of your Personal Information. Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us using the contact details provided under the “How to contact us” heading below.
- Similarly, if we have collected and processed your Personal Information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your Personal Information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures

to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

### **How to contact us**

If you have any questions or concerns about our use of your Personal Information, please contact us using the following details: [privacy@interstatehotels.com](mailto:privacy@interstatehotels.com)