

The Park Vista a DoubleTree by Hilton

PRIVACY POLICY

Last Updated: May 29, 2018

The Park Vista a DoubleTree by Hilton (the “Company” or “we”) is concerned about privacy issues and wants you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through your (“User” or “you”) use of this website, your use of any affiliated third party websites that may contain a link to this Privacy Policy, or to any pages, facilities, services, or capabilities accessible on or by any top-level **The Park Vista a DoubleTree by Hilton** domain owned by us, as well as software applications made available by us for use on or through computers and mobile devices (the “Apps”) (each, a “Site” and collectively the “Sites”), and through HTML-formatted email messages that we send to you that link to this Privacy Policy (collectively, the “Services”). By providing Personal Information to us, you agree to the terms and conditions of this Privacy Policy.

Important Information

This Privacy Policy aims to give you information on how the Company collects and processes your Personal Information through your use of its Apps and Services, including any data you may provide when you make a booking reservation, or take part in a competition.

The Company’s Apps and Services are not intended for children and we do not knowingly collect data relating to children.

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 your Personal Information so that you are fully aware of how and why we are using your Personal Information. This Privacy Policy supplements the other notices we may provide to you and is not intended to override them.

Controller

The Company is the controller and is responsible for your Personal Information.

PERSONAL INFORMATION

Personal Information We Collect

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable person, including:

- **Identity Data** which includes: first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** which includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** which includes bank account and payment card details.

- **Transaction Data** which includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** which includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Websites.
- **Profile Data** which includes your username and password, profile picture, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** which includes information about how you use our Apps, products and Services.
- **Marketing and Communications Data** which includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Third Parties

We may use a third-party payment service to process payments made through the Apps or Sites. If you wish to make a payment through the Services, your Personal Information may be collected by such third party and not by us and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party's collection, use and disclosure of your Personal Information.

We may also disclose your Personal Information to a third party when you ask us to do so or when we believe it is required by law.

If you submit any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

How We Collect Personal Information

We and our third-party service providers may collect Personal Information in a variety of ways, including:

- **Through the Sites, Apps and Services:** We may collect Personal Information through the Apps and the Services, such as when you sign up for the App or make a purchase or booking.
- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases; social network integration; joint marketing partners; online travel/restaurant companies; booking engines; social media platforms; people with whom you are friends or otherwise connected on social media platforms; and other third parties. For example, if you choose to connect your social media account to your App account, certain Personal Information from your social media account will be shared with us, and it may include Personal Information that is part of your profile or your friends' profiles.

How We Use Personal Information

We will only use or disclose your Personal Information when the law allows us to. Most commonly, we use or disclose your Personal Information in the following circumstances:

- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests; or
- where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your Personal Information other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at privacy@parkvista.com. Please note that if, in the event we rely on your consent to process your Personal Information, and you withdraw your consent we may no longer be able to provide you with: (a) updates and promotions; (b) the best user experience possible to our Services; (c) the best customer experience.

We have set out below a description of all the ways in which we plan to use your Personal Information:

- To respond to your inquiries and fulfill your requests, such as to send you **The Park Vista a DoubleTree by Hilton** newsletter and other marketing materials.
- To send administrative information to you, such as information regarding the Services and changes to our terms, conditions and policies.
- To complete and fulfill your booking or other purchase, including, for example, to process your payment, communicate with you regarding your purchase and provide you with related customer service.
- To send you marketing communications that we believe may be of interest to you.
- To contact you with respect to any billing inquiries.
- To personalize your experience on the Services by presenting products and offers tailored to you.
- To allow you to participate in sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read such rules carefully.
- To facilitate social sharing functionality.
- To allow you to send messages to a friend through the Services. By using this functionality, you are telling us that you are authorized to use and provide us with your friend's name and email address.
- For our business purposes, such as data analysis; market research; surveys; customer satisfaction; audits; fraud monitoring and prevention; developing new products and services; enhancing, improving or modifying our Services; identifying usage trends; determining the

effectiveness of our promotional campaigns and operating and expanding our business activities.

- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

How We Disclose Your Personal Information

We will only disclose your Personal Information when the law allows us to. Most commonly, we disclose your Personal Information in the following circumstances:

- To the hotel(s) at which you book a room at on the Sites or App (the “Hotel”). This sharing allows the Hotels to provide you with information about all their services and amenities that may be of interest to you.
- To non-affiliated third parties, to permit them to send you marketing communications, if you have opted-in to such sharing.
- To third-party sponsors of sweepstakes, contests and similar promotions.
- To identify you to anyone to whom you send messages through the Services.
- By you, on message boards, chat, profile pages, blogs and other services to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public and may be available to other users of the Services and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on the Services.
- To your friends associated with your social media account, to other users of the Services and to your social media account provider, in connection with your social sharing activity, such as if you connect your social media account to your Services account or log into your Services account from your social media account. By connecting your Services account and your social media account, you authorize us to share information with your social media account provider, and you understand that the use of the information we share will be governed by the social media site’s own privacy policy. If you do not want your Personal Information shared in this way, do not connect your social media account with your Services account, and do not participate in social sharing on the Services.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from

public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

OTHER INFORMATION

Other Information We May Collect

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

Browser and device information

App usage data

Information collected through cookies, pixel tags and other technologies

Demographic information and other information provided by you

Aggregated information

How We May Collect Other Information / Online Tracking

We and our third party service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, , operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.
- **Through your use of the App:** When you download and use the App, we may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.
- **Using cookies:** Cookies are pieces of information stored directly on the App that you are using. They allow us to collect information such as browser type, time spent on the Services, pages visited, your location, language preferences and anonymous traffic data. We may use the information for such purposes as security, to facilitate navigation, to display information more effectively, to personalize your experience, to understand how the Services are used, to improve the Services and to assist us with resolving questions regarding them. Cookies may further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We may also use cookies to track responses to our online advertisements. We do not track your activities when you are on third-party websites, but we or our service providers may track your actions with respect to our ads placed on third-party websites. We do not honor browser do-not-track signals at this time.

If you do not want information collected through the use of cookies, you may wish to refer to <http://www.allaboutcookies.org/manage->

[cookies/index.html](#), <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept our cookies, you may experience some inconvenience in your use of the Services.

We may use Localytics, Google Analytics or other third parties, which use cookies and other, similar technologies to collect information about use of the Services, or track, analyze and reports trends, without identifying individual visitors. You can learn about Google's practices and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>, <https://tools.google.com/dlpage/gaoptout> or Localytics at <http://www.localytics.com/privacy-policy/>, www.localytics.com/privacy-policy/.

- **Using pixel tags and other similar technologies:** We may use pixel tags (also known as web beacons and clear GIFs) in connection with the Services to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Services and response rates.
- **IP Address:** Your "IP Address" is a number that is automatically assigned to your computer by your Internet Service Provider. An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) visited. Collecting IP Addresses is standard practice and is done automatically by many websites, applications and other services. We use IP Addresses for purposes such as calculating usage levels, helping diagnose server problems and administering the Services.
- **Physical Location:** We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content.
- **From you:** Information, such as your gender or preferred means of communication, is collected when you voluntarily provide it. Unless combined with Personal Information, this information does not personally identify you.
- **By aggregating information:** We may aggregate users' Personal Information (for example, we may calculate the percentage of our users who have a particular telephone area code). Aggregated Personal Information does not personally identify you or any other user of the Services.

How We May Use and Disclose Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use it for all the purposes for which we use and disclose Personal Information.

We may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

YOUR FAILURE TO PROVIDE PERSONAL AND OTHER INFORMATION

Your provision of Personal and Other Information is required in order to use certain parts of our Services. If you fail to provide such information, you may not be able to access and use our Services or parts of our Services.

THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services is solely for your convenience, and the inclusion of such links does not imply endorsement of the linked site or service by us or by our affiliates. You access linked sites at your own risk and by accessing them you leave the App or the Services.

We are not responsible for the information collection, use and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, and we encourage you to check the applicable privacy policy to determine how these linked sites will handle any of your Personal Information.

THIRD PARTY ADVERTISERS

We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or applications, based on information relating to your access to and use of the Services and other websites or applications. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags) or use similar technologies. If you would like to learn more about this practice and your choices with respect to it, please visit http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/>. You may download the AppChoices app at <http://www.aboutads.info/appchoices> to opt out in mobile apps.

SECURITY

We seek to use appropriate organizational, technical and administrative measures to protect Personal Information within our organization, including: (a) the pseudonymization and encryption of your personal information where appropriate; (b) ensuring ongoing confidentiality, integrity, availability and resilience of processing systems and services; (c) ensuring we can restore access to personal information in a timely manner if a physical or technical incident occurs; and (d) regular testing, assessment and evaluation of the effectiveness of our technical and organizational measures to ensure your personal information is secure. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure and we cannot ensure the security of the information that you transmit. If you have reason to believe that your interaction with us is no longer secure, please immediately contact us in accordance with the “*Contacting Us*” section below.

CHOICES AND ACCESS

Your choices regarding our use of your Personal Information

For purposes of this Privacy Policy, “opt-in” is generally defined as any affirmative action by a user to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from the service.
2. At any time, you can contact us through privacy@parkvista.com or the address or telephone number provided below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Data.

We will try to comply with your request as soon as reasonably practicable. Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

How you can access, change or suppress your Personal Information

If you would like to review, correct, update, suppress or delete Personal Information that you have provided to us, contact us at the address below. In your request, please make clear what Personal Information you would like to have changed, whether you would like to have the Personal Information you have provided us suppressed from our database, or otherwise let us know what limitations you would like to put on our use of the Personal Information you have provided us. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting such change or deletion. There may also be residual information that will remain within our databases and other records and which will not be removed.

RETENTION PERIOD

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy. Processing is therefore necessary for the purposes of our legitimate interest, unless a longer retention period is required or permitted by law.

USE OF SERVICES BY MINORS

The Site is not intended for use by children. We do not intentionally gather Personal Information about visitors under the age of 16, and we request that they not provide Personal Data through the Services. If a child has provided us with Personal Data, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16, please contact us at privacy@parkvista.com. If we learn that we have inadvertently collected the personal data of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

CROSS-BORDER TRANSFER

The Services are controlled and operated by us from the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Your

Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and, by using the Services, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have different data protection rules than those of your country.

CALIFORNIA PRIVACY RIGHTS

The California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make a request please contact us at the address below.

EUROPEAN USERS' LEGAL RIGHTS

Some data protection laws, including the European Union's General Data Protection Regulation ("GDPR"), provide you with certain rights in connection with Personal Information you have shared with us. If you are resident in the European Economic Area, you may have the following rights:

1. **The right to be informed.** You are entitled to be informed of the use of your Personal Data. This Privacy Policy provides such information to you.
2. **The right of access.** You have the right to request a copy of your Personal Data which we hold about you.
3. **The right of correction:** You have the right to request correction or changes of your Personal Data if it is found to be inaccurate or out of date.
4. **The right to be forgotten:** You have the right to request us, at any time, to delete your Personal Data from our servers and to erase your Personal Data when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Data will likely impact your ability to use our services.
5. **The right to object (opt-out):** You have the right to opt-out of certain uses of your Personal Data, such as direct marketing, at any time.
6. **The right to data portability:** You have the right to a "portable" copy of your Personal Data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Data stored on our servers / IT environment to another service provider's servers / IT environment.
7. **The right to refuse to be subjected to automated decision making, including profiling:** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
8. **The right to lodge a complaint with a supervisory authority.**

To make such a request you may Contact us using the contact information below, and we will consider your request in accordance with applicable laws.

In respect of exercising your rights, please note:

No fee usually required.

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive Personal Information (*e.g.*, social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services or otherwise to us.

UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy. The “*LAST UPDATED*” legend at the top of this page indicates when this Privacy Policy was last revised. If there are any material changes to this Privacy Policy or our information practices change in the future, we will notify you by posting the changes to the Apps or the Services. Any changes will become effective when we post the revised Privacy Policy on the Apps or the Services. Your use of the Apps or the Services following these changes means that you accept the revised Privacy Policy.

Revisions:

- May 29, 2018

CONTACTING US

If you have any specific questions about this Privacy Policy, you can contact us via email or by writing to us at the address below:

privacy@parkvista.com
865-436-9211

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Gatlinburg, TN 37738