

# Privacy Policy

**Effective/Updated as of May, 2018**

GrandLife (the “Hotel”) is committed to protecting the privacy of certain data that is collected from you and that you submit when you access this website or websites, apps, or other online media under our operation and control (collectively, the “Site”). We recognize the sensitive nature of much of the information with which we are entrusted on a daily basis, and we are committed to the highest standards of privacy. The nature of our business requires that we gather and maintain information that is of a personal nature, whether it is financial or other information that you wish to keep protected. This Privacy Policy (“Policy”) is intended to familiarize you with our policies for the gathering, use, maintenance and protection of personal information on the Site.

More specifically, this Policy summarizes how the Hotel handles the personal and other information users of the Site provide while accessing and using the Site. Users of the Site include members of the general public.

By accessing the Site, you are indicating your agreement to this Policy. Please review this Policy carefully. The Hotel reserves the right to change its Policy at any time. In the event of materials changes the Site will contain a notice of the change. Changes will be effective immediately upon posting to the Site. However, except to the extent we receive your authorization or as permitted or required by applicable law, we will handle your personal information in accordance with the terms of the Policy in effect at the time of the collection. If you have any questions or concerns about the Policy, please contact us by calling 212-965-3275 or as provided below.

**Information Collected.** As you are probably aware, we may collect information from a variety of sources to operate the Site, carry out our business, comply with law and other purposes described herein.

The Hotel may compile statistical information concerning the usage of the Site. This information allows the Hotel to monitor its utilization and continuously improve its quality. Examples of this information would include, but not be limited to, the number of visitors to the Site, or to sections or pages within the Site, patterns of traffic flowing through the Site, length of time spent on the Site, or in sections or pages of the Site, the other sites that refer visitors to the Site, the pages of the Site that visitors frequently use as entry and exit points, utilization of the browser and operating systems and versions used by visitors to the Site. In order to compile this information, the Hotel may collect and store your IP address, your operating system version, your browser version, the pages you visit within the Site, the length of time you spend on pages within the Site, the site from which you linked to ours, search terms you used in search engines which resulted in you linking to the Site, etc. While all of this information can be associated with the IP address your computer had while you visited the Site, it will not be associated with you as an individual, or associated with any other information you may submit through the Site, or that Hotel may store about you for any other purposes.

We also collect personal information such as: your contact information; and information related to products and services you buy or receive from us, such as in connection with

making reservations, participation in membership or loyalty programs, participation in contests, sweepstakes, surveys or marketing programs. This personal information can include data such as name; personal or work contact information; personal characteristics, such as gender, date of birth, title, and nationality; income; passport number and date and place of issue; travel history; payment information, such as your payment card number, authentication information and other billing and account details associated with mobile billing; guest preferences; marketing and communication preferences; sensitive personal data relating to special accommodation requests; reviews and opinions; frequent flyer or similar membership program number and related information; information provided on membership and account applications; and other types of information that you choose to provide to us or that we may obtain about you. Similar information also may be collected about your family members or individuals with whom you are using our products and services. Additionally, we may collect employment history, and related information if you seek employment with us which might include your work history and salary information. In addition, we collect other personal information in certain cases, such as email addresses, when you sign up to receive our electronic newsletter. Your contact information and payment information is also collected when you use how ticketing purchase service. We may also collect information about you third parties such as through your social media services consistent with your settings on such services, and from other third-party sources that are lawfully entitled to share your data with us. We use and share this information (and may add it to the other information we have on file for you) for the purposes described in this Policy.

Note that if you choose not to provide your personal information, we may be unable to provide the products, services, information, or assistance you are seeking.

**Cookies and Analytics.** The Hotel may use web site internet tags (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs) and “cookies.” We may deploy these tags/cookies through a third party partner who may be located and store the information in a foreign country. This technology, including cookies, may be sent to your computer or other device, in the process of compiling the statistical information mentioned above and to tailor certain pages of the Site for your browsing convenience. A cookie is a small data file that contains information such as the URL you came from, your computer's IP address and domain type (e.g., .com or .org, etc.), your browser type, the country, state and telephone area code where your server is located, the pages of our Site that were viewed, and any search terms that you entered on our Site. This information generally is used for internal purposes. For example, we use cookies to improve the quality of our service when you visit our Site. We also use cookies to remind us of who you are, tailor our products, services and advertising to suit the personal interests of you and others, estimate our audience size, assist our online merchants to track visits to and sales at our Site and to process your order, track your status in our promotions, contests and sweepstakes, and/or analyze your visiting patterns. We do not link your URL or IP address to any personal information unless you have logged into our Site with an established account login and password. A session cookie expires immediately when you end your session (i.e., close your browser). A persistent cookie stores information on the hard drive so when you end your session and return to the same web site at a later date the cookie information is still available. You may prevent or stop the installation and storage of cookies by your browser

settings by downloading and installing the free Opt-out Browser Add-on available at <https://tools.google.com/dlpage/gaoptout?hl=en> (link is external). If you do that, our Site may not function correctly. Refer to the Help feature of your browser for information on disabling cookies.

If you would like more information about web tags and cookies associated with on-line advertising please visit the Network Advertising Initiative website <http://www.networkadvertising.org> (link is external) or <http://www.allaboutcookies.org/>.

We may use analytics services, such as provided by Google Analytics, to help generate statistics about our Site's traffic, sales, etc. for reports on our Site activity. The analytics services may transfer this information to third parties in case of a statutory obligation or if a third party processes data on behalf of that service. These analytics services will generate detailed statistics about a website's traffic and traffic sources and measure conversions and sales. The information generated about your use of our Site, including your IP address, will be anonymized by use of the appropriate settings (“\_anonymizeIp()” function or equivalent). For more information on how IP anonymization works please see, for example, <https://support.google.com/analytics/answer/2763052> (link is external).

**IMPORTANT:** By using the Site, you consent to the processing of any personal data for the analytics purposes and functions described above.

**Information of Children.** The Site is not directed to children as the products and services on this Site are intended for persons 18 years of age and older. The Hotel does not knowingly collect, use or disclose any personal information from children. If you are concerned about your child's use of the Site, you may use web-filtering technology to supervise or limit access to the Site.

**Use of Information.** In general, we will use the information we collect about you only for the purpose it was collected, for compatible purposes, as permitted or required by law, as necessary to carry out our contractual duties and obligations, and as otherwise provided in this Policy. For example, we may use your personal information to:

- Provide you with the products and/or services you have purchased or requested. This might include establishing an on-line profile, making a reservation, or make improvements in the design and administration of the Site.
- Market our products or services that we think may be of interest to you. For example, we may use your personal information to send you newsletters and promotions using any communications preferences you have expressed. We use your information to provide in-stay messaging, account alerts, and reservation confirmations; to send you marketing messages; and to conduct surveys, sweepstakes, prize draws, and other contests. We may provide these communications via email, postal mail, online advertising, social media, telephone, text message (including SMS and MMS), push notifications, in-app messaging, and other means. With your consent, we also use user-generated content (such as photos) from social media services to deliver display advertising or on our Site and apps. We may also partner with third parties to learn whether a visitor to our site has a cash-back offer associated with their payment card and to deliver the visitor advertising and information that explains how to take advantage of that offer.

- Ensure your information is accurate and to personalize our products and services. For example, we may aggregate your personal information with data from third-party sources for purposes of keeping information up to date and analytics. We also rely on information from third parties in order to provide better, more personalized service. If you connect your social media services or other accounts to our services, we may use this information to make your experiences with us more personal and social, or share and use it as described elsewhere in this Policy

**Disclosure of Information.** In general, we will not disclose your personal information except with your consent and as described in this Policy. We may disclose your personal information for the same reasons that we may use it as described in this Policy, which includes disclosing it to our affiliates and non-affiliated entities, as we deem necessary to carry out those purposes. For example, and without limitation, the Hotel may need to use or disclose this information with its third party vendors to manage the Site; process payments and requests for products and services; provide you with products, services, or offers; coordinate your participation in our loyalty reward or similar programs; engage in marketing activities, such as sharing personal information with our partners to deliver advertisements to our shared customers; enhance our services by, among other methods, obtaining assistance with providing more personalized services to you through analytics and other technologies; and protecting the Hotel's interests and legal rights, such as through responding to subpoenas and defending litigation. We endeavor to choose affiliates and non-affiliates with similar standards to ours regarding the protection of personal information. In no case will the Hotel sell or license personal information to third parties, except as required or permitted by law. For example, we may sell, assign or share personal information in connection with certain business transactions, such as the acquisition of all or substantially all of the Hotel's assets. In such cases, we will take appropriate steps under the circumstances and to the extent possible to ensure that the recipient agrees to provide privacy protections substantially similar to those established by this Policy.

**Do Not Track.** "Do Not Track" is a privacy preference that you can set in your Internet search browser that sends a signal to a website that you do not want the website operator to track certain browsing information about you. However, because our Site is not configured to detect Do Not Track signals from a user's computer, we are unable to respond to Do Not Track requests.

**Modifying Your Personal Information.** If you would like to update your personal information on the Site, you may email us at [ellis.yee@grandlifelifehotels.com](mailto:ellis.yee@grandlifelifehotels.com). Also, if you wish to unsubscribe from any of our newsletters or other communications for which you have registered, you may e-mail us at [ellis.yee@grandlifelifehotels.com](mailto:ellis.yee@grandlifelifehotels.com).

**Safeguarding of Information.** No system for safeguarding personal or other information is 100% secure. However, we take a number of steps to safeguard the security of personal information obtained through the Site. For example, we use Secure Socket Layer (SSL) data encryption when data is transmitted over the Internet to our Site. We have installed layered firewalls and other security technologies to help prevent unauthorized access to our systems. Our data centers are maintained in a secure environment with appropriate security

measures. Our employees are trained to understand the importance of confidentiality and are required to adhere to our privacy policies and procedures. Employees who violate these policies and procedures are subject to disciplinary action. We employ numerous practices to protect against the disclosure of information for purposes unrelated to the performance of our business functions or to individuals other than those who must use it in the course of their work activities. These practices include the use of password protection of computer files, e-mail and voice-mail, video surveillance, and other physical, electronic, and procedural safeguards.

**Applicable law.** This Policy is governed by the internal substantive laws of New Jersey, without regard to its conflict of laws principles. Jurisdiction for any claims arising under or out of this Privacy Policy shall lie exclusively with the state and federal courts within New Jersey. If any provision of this Policy is found to be invalid by a court having competent jurisdiction, the invalidity of such provision shall not affect the validity of the remaining provisions of this Policy, which shall remain in full force and effect.

If you are a California resident, please read the following:

- California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by certain members of the Hotel to third parties for the third parties' direct marketing purposes. Requests may be made one time per calendar year. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year (e.g., requests made in 2018 will receive information regarding 2017 sharing activities). You may submit your request using the contact information at the end of this Policy.
- If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California law permits you to request and obtain removal of content or information you have publicly posted. You may submit your request using the contact information at the end of this Policy. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

If you are a resident of the European Economic Area, please read the following:

We make every attempt to process your personal information in accordance with the requirements of the General Data Protection Regulation (GDPR). In addition to the information provided above, residents of the European Economic Area should be aware of the following:

**Rights.** As a resident of the EEA, you may have certain additional rights, subject to limitations regarding the processing of your personal information. These may include the right to:

- Access or request a copy of your personal information
- Correct any inaccuracies relating to your personal information
- Restrict the processing of your personal information
- Object to the processing of your personal information
- Request the erasure of your personal information

- Receive your personal information in a commonly-used machine readable format and have that information transmitted to another data controller.
- Withdraw your consent to the processing of your personal information
- Lodge a complaint with the Supervisory Authority in your jurisdiction.

**Retention.** We retain your personal information only for the period of time needed to fulfill the purposes stated in this Policy.

These rights may not apply to individuals residing outside of the EEA.

**Contact Us.** If you have any questions regarding this Policy or our policies in the event of a compromise of your information, you may contact us at:

**Ellis Yee**  
**310 West Broadway**  
**NY, NY 10012**  
**[ellis.yee@grandlifhotels.com](mailto:ellis.yee@grandlifhotels.com)**  
**(212) 965-3275**