

Privacy Notice

Last Updated: July 29, 2023

Introduction

Tufenkian Hospitality LLC and its corporate affiliates or subsidiaries (collectively, Tufenkian Heritage Hotels) care about privacy and want you to be familiar with how we collect, disclose, and use (“**Process**”) information about you. This privacy notice (“**Privacy Notice**”) describes our practices concerning information we collect through our websites (the “**Websites**” or “**sites**”), social media pages we control (“**Social Media Pages**”), and software applications we make available (“**Apps**”) and through offline activities, such as when you provide your data by phone via our call centers or in person (collectively, for all items above, the “**Services**”).

This Privacy Notice does apply to hotels operated by Tufenkian Hospitality and franchisees (independently owned and operated) or that Tufenkian Heritage Hotels manage (“**Hotels**”).

Please read the following to learn more about our privacy practices, and note that our practices are subject to applicable local legal requirements.

Information Categories

We collect “Personal Information” (information that identifies you, relates to you, describes you or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly with you as a particular individual or as defined under applicable law, your household) about you from a variety of sources and use and disclose it for multiple purposes.

Contact Information

- **Elements:**
 - Sample data elements include without limitation, real name, alias, postal address, phone number or email address

Demographic Information

- **Elements:**
 - Sample data elements include without limitation, age, gender, family status, income or other information

Government-issued Identification Numbers or Documents

- **Elements:**
 - Sample data elements include without limitation, driver’s license number, social security number, passport number or other similar government-issued identification number and associated documents

Financial Information

- **Elements:**
 - Sample data elements include without limitation, credit or debit card number, bank account number or other financial information

Unique Personal Identifiers

- **Elements:**
 - Sample data elements include without limitation, online identifiers, Device ID, Internet Protocol (IP) address, account or membership name or identification number or other similar identifiers

Transaction, Relationship, Personal Preferences, Usage and Location Information

- **Elements:**
 - Sample data elements include without limitation, purchase or usage history (for example, stay or trip information and preferences, such as your preferred location/facilities, dates and number of children included), member or other program status, communications preferences, product or service preferences (such as any special needs or conditions that may impact your stay), Services usage history, location information

User Generated Content or Social Media Account Information

- **Elements:**
 - Sample data elements include without limitation, reviews, testimonials, posts or social media account information such as profile data, posts or other information

Cookies, Pixels or Beacons

- **Elements:**
 - We may use “cookies” (small text files this site sends to your computer and stores on your hard drive) to save your preferences. For example, a cookie may save a user’s login details, so that they do not need to login every time. Cookies may be persistent or temporary. Persistent cookies retain preferences for future sessions and stay valid until a set expiry date (unless deleted earlier by the user). Temporary cookies expire at the end of the session, when the browser is closed.
 - If you enroll in marketing text messages, cookies may be used to personalize your experience (e.g., send you personalized text messages).
 - **Google Analytics:** We use Google Analytics to better understand how visitors use our site and for interest based advertising associated with your Google Account and devices you use. This cookie’s site usage information is transmitted to and stored by Google.
 - **Pixels, Beacons:** We or third party ad servers may use invisible pixels or beacons to count users visiting certain pages. This is collected, reported in the aggregate and may be used to improve our marketing programs, and target advertisements at this Website and/or on others.

Sensitive Personal Information

- **Elements:**

- Sample data elements include without limitation, personal information that reveals your Social Security or other state identification number, your account log-in, financial account, debit card, or credit card in combination with any required security or access code, password, or credentials allowing access to an account, your geolocation, your racial or ethnic origin, and the contents of your mail, email, or text messages when you communicate with us.

- **Legitimate Business Interests / Purposes:**
 - We may use this information for our business transactions with you, including without limitation, to:
 - Enter into or perform a contract with you
 - Respond to your inquiries or requests, or to complete and fulfill any purchases or services requests
 - Send transactional or administrative information to you
 - Allow you to participate in sweepstakes, contests and similar promotions, and to administer them
 - Send you communications we believe may interest you, for our own or third parties' products and services
 - Allow you to send messages to a friend through the Services, or submit reviews or other user-generated content
 - Allow you to participate in any loyalty or other programs
 - Personalize your experience on the Services by presenting products and offers tailored to you
 - Allow you to enable multi-factor authentication to access your account
 - Complete and fulfill any purchases or requests for services (for example, if you are travelling as a family with adults and children and have associated accommodations preferences)
 - We may use this data to more precisely identify you where needed, such as for fraud prevention or compliance verification; or as required by law, such as for tax or financial processing or other purposes
 - Complete and fulfill loyalty program activities by using a membership number, if applicable
 - Analyze usage of the Services (for example, on our Websites, Social Media Pages or Apps)
 - Understand how you use our Services across the various devices, and to deliver tailored promotions
 - Recognize you across devices you use, and allow us to **serve targeted advertisements about goods or services that may interest you when you access and use our Services or other websites, apps or online services**
 - Facilitate geolocation activities as described below
 - Personalize your experience on the Services by presenting products and offers tailored to you
 - Complete and fulfill any purchases or requests for Services (for example, if a special need, condition or other preference is mentioned that may impact the accommodation arrangements for your stay, or if you have a preferred location/facilities or amenities for your stay)

- Configure your profile to reflect your communications preferences (for example, preferring email over text messages or postal mail, or opting in or out to certain types of messages)
 - Facilitate social sharing functionalities of your social media account(s)
 - Send you newsletters or marketing communications we believe may be of interest to you, for our own products and services, and on behalf of our Affiliates or selected third parties
 - Allow you to provide a testimonial or story, or submit a review or comment
 - Allow you to “Like”, “Follow” or otherwise connect with or post to one of our Social Media Pages
 - Simplify your Website use by saving your preferences to improve your next visit to our Website
 - Determine how the Website is used (statistical or marketing purposes)
 - Facilitate tailored advertising or monitor patterns of buying specific goods or interest – for example, holidays or hobbies and run advertisements tailored to the user based on online buying habits
 - Facilitate interest based advertising associated with your Google Account and devices you use
 - Understand how you use our Services across the various devices you use and to deliver tailored promotions
 - We may use this information, as allowable under applicable law, to provide or enhance our Services; to prevent, detect, and investigate security incidents; to resist malicious, deceptive, fraudulent or illegal actions directed at us; to ensure the physical safety of natural persons; for short-term transient use; to perform services on behalf of the business such as, but not limited to, providing customer service, verifying customer information, processing payments, or providing other similar services on behalf of the business.
 - **Limit on the Use of Your Sensitive Personal Information:**
 - **We do not use your Sensitive Personal Information to infer characteristics about you, or for other purposes beyond what is allowable under applicable law.**
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- **Sources:**
 - You, when you interact with us, including without limitation as described above (for example, using the Services, contacting us, making a reservation, registering or paying for a product or service, staying at a property, providing us feedback or reviews, participating in loyalty or other programs, promotions or activities)
 - Other sources, including without limitation public databases, joint marketing partners, data firms, social media platforms, from your social media connections, your social media account if you choose to connect it to your Website account if applicable, or other third parties
 - **Sharing:**

- We may share this information with Affiliates, Service Providers, Business Partners and Other Third Parties as described in this Privacy Notice or as permitted by law as described below under “Information Disclosure”
- **We may sell, share or license this information for financial consideration to our former affiliate, a timeshare corporation so that they may contact you about their products or services which may interest you**
- We do not control or have access to third party advertising partners’ cookies, but allow them to be used to identify purchasing or interest patterns and run ads tailored to the user’s online habits.
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- **Retention Period:**
 - We will retain your Contact Information for the period necessary to fulfill the purposes outlined herein unless a longer period is required or permitted by law, or required by legal process, such as a pending claim or litigation requiring preservation of relevant records. We may sell or license this information for financial consideration to our former affiliate, a timeshare corporation so that they may contact you about their products or services which may interest you.
 - We will retain information collected about you from Cookies, Pixels, or Beacons for the period necessary to fulfill the purposes outlined herein unless a longer period is required or permitted by law, or required by legal process, such as a pending claim or litigation requiring preservation of relevant records
 - We will retain your Transaction, Relationship, Personal Preferences, Usage and Location Information for the period necessary to fulfill the purposes outlined herein unless a longer period is required or permitted by law, or required by legal process, such as a pending claim or litigation requiring preservation of relevant records.
 - We will retain your Government-issued Identification Numbers or Documents for the period necessary to fulfill the purposes outlined herein unless a longer period is required or permitted by law, or required by legal process, such as a pending claim or litigation requiring preservation of relevant records.
 - We will retain your User Generated Content or Social Media Account Information for the period necessary to fulfill the purposes outlined herein unless a longer period is required or permitted by law, or required by legal process, such as a pending claim or litigation requiring preservation of relevant records.

All Categories

Data from all categories above, subject to the limitations outlined for Sensitive Personal Information, may also be used for our legitimate business interests / purposes concerning data analysis, audits, fraud monitoring and prevention, internal quality assurance, developing new products, enhancing our Services, helping us comply with legal requirements or process, enforcing compliance with our Terms of Use or any product, service or program terms and conditions, helping protect our Services, determining the effectiveness of our promotional campaigns and operating and expanding our business activities. We may share or disclose it to respond to requests from public and government authorities globally; to protect our operations or those of any of our Affiliates or other third

parties; to protect our rights, privacy, safety or property, or that of our Affiliates, you or other third parties or to allow us to pursue available remedies or limit damages we, our Affiliates or other third parties may sustain.

Automated Decision Making and Profiling

We do not perform automated decision making or profiling with your Personal Information in furtherance of decisions that produce legal or significant effects concerning you under applicable law.

Non-Personal Information

We and our third-party service providers may collect usage information when you visit and use the Services. This may include browser type and/or settings, operating system, page(s) served, the time, request source, preceding page view, and similar data. We may analyze this information and use it to help us determine how our Services are used, such as how visitors arrive at the Services, what content is popular or most relevant and what type of visitors are interested in certain content or ads. We use non-personal information in a variety of ways, including to help analyze site traffic, understand customer needs and trends, carry out targeted promotional activities and improve our services. We may use such data by itself in anonymized form or aggregate it with information obtained from others. We may share such data with our affiliated companies and third parties to achieve these objectives and others, but the aggregate or anonymized data does not personally identify you. We may provide our analysis and certain non-personal information to third parties (who may use it in turn to serve ads tailored to your interests), but this will not personally identify you.

If we subsequently associate your usage data or re-identify anonymized data with Personal Information you provide in a way that allows us to identify you as an individual or as part of a household under applicable law, we will treat the combined data as Personal Information.

Information Disclosure. We may disclose your Personal Information as described below.

- **Affiliates:** To any other entity that is, at the time you disclose your Personal Information, directly or indirectly controlled by, or under common control with us (“**Affiliates**”) for the purposes described herein, unless otherwise prohibited by law..
- **Service Providers:** We may disclose your information to our service providers, who perform services for us such as, without limitation: travel services, financial and/or tax services, vacation insurance, website hosting, data analysis, payment or credit card processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, legal advisers, accountants, auditing or other services.
- **Business Partners:** In accordance with your preferences, we may disclose your Personal Information to business partners to provide you with services of interest to you.

- **Third Parties:** Subject to your marketing or other preferences (which may include consent), we may license, sell, or otherwise share your Personal Information with selected third parties for compensation for their own business purposes or our own business purposes. Such third parties may include timeshare organizations formerly affiliated with us or third parties for the purposes of advertising network services. Once shared with such entities, this Personal Information may become subject to the third party's privacy practices.
- **User Generated Content:** We may offer facilities for users to submit content such as reviews, message boards or other content. Any information disclosed in these areas becomes public information and you should always be careful when deciding to disclose your Personal Information. We are not responsible for privacy practices of other users including website operators to whom you provide information.
- **Disclosure Permitted by Law:** We may disclose your Personal Information to law enforcement authorities, government or public agencies or officials, regulators, and/or any other person or entity with appropriate legal authority or justification for receipt of your data, if required or permitted to do so by law or legal process, to respond to claims, or to protect our rights, interests, privacy, property or safety, and/or that of our Affiliates, you or other third parties.

Information Safeguards

We have implemented reasonable and appropriate physical, technical and administrative steps to help protect your personal information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Unfortunately, no security system is 100% secure, thus we cannot ensure the security of all information you provide to us via the Services.

Other Important Information

- **Other Individuals:** If you provide us with information about someone else, you must have their permission to do so for the purposes detailed in this Privacy Notice.
- **Website Links:** The Services may link to sites we do not operate. We have no control over how they collect your data or liability for their practices, policies and security measures. You should read privacy notices on other sites before providing any data to them.
- **Social Media Platforms or Sites:** We are not responsible for the privacy policies and/or practices of third parties such social media platform or site providers, RIM or any other app developer or provider, operating system provider, wireless service provider or device manufacturer, and/or any data you disclose to them.
- **Privacy Notice Changes:** We may update this Privacy Notice from time to time and/or use Personal Information for uses not previously disclosed. Updated and date stamped versions will be posted on the Services. The revised notice will take effect upon posting, but any new provisions will only apply to data collected after the posting is effective. Should we need to materially change the way we Process information we previously collected about you, we will only do so after we notify you and obtain your express consent.
- **Retention Period:** We will retain your Personal Information for the period necessary to fulfill the purposes outlined herein unless a longer period is required or permitted by law, or required by legal process, such as a pending claim or litigation requiring preservation of relevant records.

Your Choices and Rights

- **Marketing Preferences:** You can opt-out from our marketing communications by using the unsubscribe function in our emails; or contacting us as set forth under “**Contact Us**” below.
- **Withdrawing Consent:** You may withdraw any consent you provided to us to Process your Personal Information at any time.
- **Access / Right to Know:** You may access Personal Information we Process about you. Any request to access or obtain copies of your Personal Information must be made in writing by contacting us as set forth below. We may also ask you to verify your identity and to provide further details relating to your request.
 - **As allowable under applicable law, you** have the right to request a copy of specific pieces of personal information or categories of personal information we collected about you in the prior 12 months and to receive it free of charge by email or other electronic portable and usable format. You may also request information about how we have handled your personal information in the prior 12 months, including the following, by category: personal information collected; sources of personal information; purposes for collecting and selling or sharing your personal information; third parties with whom we shared your personal information for a business purpose and corresponding personal information categories shared; categories of third parties with whom we sold or shared your personal information and corresponding personal information categories sold. As allowable under applicable law, you may make Right to Know requests up to twice every 12 months as set forth under “Submitting Requests” below.
- **Correction:** We will take reasonable steps to ensure the accuracy of Personal Information we maintain about you. You are responsible for submitting accurate and complete information to us, and timely updating us if it changes. You may contact us to request that we correct any inaccurate or incomplete data.
- **Erasure / Deletion:** You may contact us to request we delete your Personal Information. We will assess your request and determine whether we may delete the information if no exemption under law applies, or it is not otherwise subject to a longer legal requirement or as part of information required to be preserved due to a pending claim or litigation.
- **Processing Objection:** You may contact us to object to any Processing of your Personal Information. We will assess your request and determine whether we have any legal or other justification for continued Processing.
- **Right to Non-Discrimination:** Applicable law prohibits discrimination against individuals for exercising their rights, such as by denying or providing a different level or quality of goods or services, or charging different prices or imposing penalties on residents who exercise their privacy rights, unless doing so is reasonably related to the value provided to the business by the residents’ data.
- **Right to Appeal:** Upon receipt of a denial of your individual privacy rights request, you may appeal our decision by contacting us as set forth in “Contact Us” below.

Contact Us

If you have a complaint or concern about how we Process your Personal Information, we will work to address it. You may also direct your complaint/concern to your applicable data

protection authority. If you have any privacy-related questions or concerns, or would like to make any requests in relation to your Personal Information, your Choices, Rights, or its Processing, please email info@tufenkia.am, or by calling + 374 50 60 10 30 or send a letter to:

Tufenkian Heritage Hotels

Yerevan, Hanrapetutyun 48

0010 Armenia

Attn: Legal Privacy

Privacy Notice Changes

We may change this Privacy Notice from time to time and the date of last revision is included at the beginning of this notice.

Should we need to change the purpose or the type or the way we Process information we previously collected about you, we will only do so after we notify you and obtain your express consent to the extent required under applicable law.