

PRIVACY CENTER for Members.LongboatKeyClub.com/ Longboat Key Member Login (“The Company”)

Last Updated: December 10, 2019

PRIVACY PREFERENCES

We respect your privacy and want to provide you with the options, information, and choices below so that, if you choose to, you can express your preferences on: what and how much of your personal information you share with us and when and how you hear from us. We do not sell your personal information or data, and only share it with the persons or entities, and for the purposes, described herein.

Cookie Preferences

As described in more detail in our Privacy Statement, we use digital tools like cookies and tags on our webpages. Cookies provide us information on how you access and use your web browser. Cookies help us provide, protect and improve our services. We also use cookies to learn what is relevant to you and ensure you have a personalized experience. We describe below how you can refuse cookies.

Communication Preferences

We want to engage with you in a way that is valuable to you, including how often you want to hear from us. To unsubscribe to any communications from us, use the “unsubscribe” link contained at the bottom of any of our communications to you. NOTE: Even if you choose to opt out of communications, we will continue to send you transactional messages about your reservations or stays, including pre-arrival, confirmation, matters relating to your stay, thank you’s and guest satisfaction surveys.

Other Preferences

This Privacy Policy is intended to provide disclosures for purposes of the European General Data Protection Regulation (“GDPR”) and California Consumer Privacy Act (“CCPA”).

The Company has asked PCFSI, as a vendor, to assist in providing the information contained in this Privacy Statement and assisting The Company in its compliance herewith. If you are a EU resident looking to exercise your individual rights under the GDPR or a California Resident looking to exercise your individual rights under the “CCPA, please email Privacy@pcfsi.com or mail us at:

PCFSI
Attention: Privacy
1000 Market Street, Bldg 1, Suite 300
Portsmouth, NH 03801 United States of America

We look forward to providing you with experiences that exceed your expectations both online and at The Company. For your protection, you may be asked to satisfactorily verify your identity before we respond to any request.

If we don’t hear from you, or you don’t choose any of the preferences described above, you are telling us that you do not choose to elect preferences or exercise such rights at this time.

PRIVACY STATEMENT FOR THE COMPANY

The Company and the Company's marketer, value you as a Company guest and recognizes that privacy is important to you. So, we want you to be familiar with how the Company collects, use and discloses data.

This Privacy Statement describes the privacy practices of The Company for data that we collect:

- through websites operated by us, or on our behalf now or in the future, through which you are accessing this Privacy Statement, including, but not limited to The Company website, and other websites owned or controlled by The Company or our website vendors for us (collectively, the "**Websites**")
- through the software applications made available by us for use on or through computers and mobile devices (the "**Apps**")
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our "**Social Media Pages**")
- through HTML-formatted email messages that we send you that link to the websites with this Privacy Statement and through your communications with us
- when you interact with us when you visit or stay as a guest at one of our properties and through other offline interactions ("**Offline Services**") and the Websites, the Apps and our Social Media Pages, ("**Online Services**"), together we collectively refer to herein as the "**Services.**"

By using the Services, you agree to the terms and conditions of this Privacy Statement.

Collection of Personal Data

"**Personal Data**" are data that identify you as an individual or relate to an identifiable individual.

At touchpoints throughout your guest journey, through the Services, and perhaps otherwise, we collect Personal Data, in some cases as is required by law, such as:

- Name
- Gender
- Postal address
- Telephone number
- Email address
- Credit and debit card number or other payment data
- Financial information in limited circumstances
- Language preference
- Date and place of birth
- Nationality, passport, visa or other government-issued identification data
- Important dates, such as birthdays, anniversaries and special occasions
- Membership or loyalty program data (including co-branded payment cards, travel partner program affiliations)
- Employer details
- Travel itinerary, tour group or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests
- Geolocation information
- Social media account ID, profile photo and other data publicly available

In more limited circumstances, we also may collect:

- Data about family members and companions, such as names and ages of children
- Biometric data, such as digital images
- Images and video and audio data via: (a) security cameras located in public areas, such as hallways and lobbies, in our properties; and (b) body-worn cameras carried by our loss prevention officers and other security personnel
- Guest preferences and personalized data (“**Personal Preferences**”), such as your interests, activities, hobbies, food and beverage choices, services and amenities of which you advise us or which we learn about during your visit

In the past 12 months, if California residents have used this website or completed forms in connection with membership at Longboat Key Club, all of the above listed Personal Data (that may be within CCPA categories or covered by CCPA) may have been collected from you.

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and do hereby consent on your own behalf, and on behalf on anyone you are assisting, to and permit us to use the data (as defined herein) collected in any way by us, including through Services, in accordance with this Privacy Statement.

How We Collect Personal Data

We collect Personal Data, including through the Services, in a variety of ways:

- **Online Services.** We collect Personal Data when you make a reservation, purchase goods and services from our Websites or Apps, communicate with us, or otherwise connect with us or post to social media pages, or sign up for a newsletter or participate in a survey, contest or promotional offer.
- **Property Visits and Offline Interactions.** We collect Personal Data when you visit our properties or use on-property services and outlets, such as restaurants, concierge services, health clubs, child care services, and spas. We also collect Personal Data when you attend promotional events that we host or in which we participate, or when you provide your Personal Data to facilitate an event.
- **Customer Care Centers.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
- **Other Sources.** We collect Personal Data from other sources, such as public databases, joint marketing partners and other third parties.
- **Internet-Connected Devices.** We collect Personal Data from internet-connected devices available in our properties. For example, a smart home assistant may be available for your use and to tailor your accommodations and experience.
- **Physical & Mobile Location-Based Services.** We collect Personal Data if you download one of our Apps or choose to participate in certain programs. For example, we may collect the precise physical location of your device by using satellite, cell phone tower, WiFi signals, or other technologies. We will collect this data if you opt in through the App or other program (either during your initial login or later) to receive the special offers and to enable location-driven capabilities on your mobile device. If you have opted-in, the App or other program will continue to collect location data when you are in or near a participating property until you log off or close application (i.e., the App or other program will collect this data if it is running in the background) or if you use your phone’s or other device’s setting to disable location capabilities for the App or other program.

Collection of Other Data

“**Other Data**” are data that generally do not reveal your specific identity or do not directly relate to an individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data. Other Data include:

- Browser and device data
- App usage data
- Data collected through cookies, pixel tags and other technologies
- Demographic data and other data provided by you
- Aggregated data

How We Collect Other Data

We collect Other Data in a variety of ways:

- **Browser or device.** We collect certain data through browsers or automatically through an end-user device, such as the Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) being used. We use this data to ensure that the Online Services function properly.
- **Use of the Apps.** We collect certain data when a user downloads and uses an App, such as App usage data, the date and time the App on your device accesses our servers and what data and files have been downloaded to the App based on your device number.
- **Cookies.** We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device being used. Cookies allow us to collect data such as browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We use the data for security purposes, to facilitate navigation, to display data more effectively, to collect statistical data, to personalize the user experience while using the Online Services and to recognize the end-user computer to assist in use of the Online Services. We also gather statistical data about use of the Online Services to continually improve design and functionality, understand how they are used and assist us with resolving questions.

Cookies further allow us to select which advertisements or offers are most likely to appeal to the user and display them while using the Online Services or to send marketing emails. We also use cookies to track responses to online advertisements and marketing emails.

You can choose whether to accept cookies by changing the settings on your browser. To turn off and not accept cookies follow the instructions for settings on your specific computer and choice of browser. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognize your computer. You also will not receive advertising or other offers from us that are relevant to your interests and needs. At this time, we do not respond to browser “Do-Not-Track” signals.

- **Pixel Tags and other similar technologies.** We collect data from pixel tags (also known as web beacons and clear GIFs), which are used with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Online Services.
- **Analytics.** We collect data through Google Analytics and Adobe Analytics, which use cookies and technologies to collect and analyze data about use of the Services. These services collect data regarding the use of other websites, apps and online resources.
- **Adobe Flash technology (such as Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies.** We collect data through Flash LSOs and other

technologies on some Websites to, among other things, collect and store data about your use of the Online Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage. Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications, including those used with the Online Services.

- **Your IP Address.** We collect your IP address, a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.

Aggregated Data. We may aggregate data that we collected and this aggregated data will not personally identify you or any other user.

Use of Personal Data and Other Data

We use Personal Data and Other Data to provide you with Services, to develop new offerings and to protect The Company and our guests as detailed below. In some instances, we will request that you provide Personal Data or Other Data to us directly. If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services. **If you are a California Resident, it is likely that your Personal Data has been used on the manners provided below.**

We use Personal Data and Other Data for our legitimate business interests, including the following:

- **Provide the Services you request.** We use Personal Data and Other Data to provide Services you request, including:
 - To facilitate reservations, payment, send administrative information, confirmations or pre-arrival messages, to assist you with meetings and events and to provide you with other information about the area and the property at which you are scheduled to visit
 - To complete your reservation and stay, for example, to process your payment, ensure that your room is available and provide you with related customer service
 - To support our electronic receipt program. When you provide an email address in making a reservation, we use that email address to send you a copy of your bill. If you make a reservation for another person using your email address, that person's bill will be emailed to you, as well. You can opt out of receiving your bill via email and instead receive a paper copy by contacting the front desk

We will use Personal Data and Other Data to manage our contractual relationship with you, because we have a legitimate interest to do so and/or to comply with a legal obligation.

- **Personalize the Services according to your Personal Preferences.** We use Personal Data and Other Data to personalize the Services and improve your experiences, including when you contact our call center, visit one of our properties or use the Online Services, to:
 - Customize your experience according to your Personal Preferences
 - Present offers tailored to your Personal Preferences

We will use Personal Data and Other Data to provide personalized Services according to your Personal Preferences either with your consent or because we have a legitimate interest to do so.

- **Communicate with you about goods and services according to your Personal Preferences.** We use Personal Data and Other Data to:

- Send you marketing communications and promotional offers, as well as periodic customer satisfaction, market research or quality assurance surveys

We will use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

- **Sweepstakes, activities, events and promotions.** We use Personal Data and Other Data to allow you to participate in sweepstakes, contests and other promotions and to administer these activities. Some of these activities have additional rules and may contain additional information about how we use and disclose your Personal Data. We suggest that you read any such rules carefully.

We use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

- **Business Purposes.** We use Personal Data and Other Data for data analysis, audits, security and fraud monitoring and prevention (including with the use of closed circuit television, card keys, and other security systems), developing new goods 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.

We use Personal Data and Other Data in this way to manage our contractual relationship with you, comply with a legal obligation and/or because we have a legitimate interest to do so.

Disclosure of Personal Data and Other Data

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we share Personal Data and Other Data with the following:

- **Service Providers.** We disclose Personal Data and Other Data to third-party service providers for the purposes described in this Privacy Statement. Examples of service providers include companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services.

Corporate Restructuring. We may disclose or transfer your Personal Data and Other Data to a third party in the event of any restructuring, business reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of The Company business, assets or stock (including in any bankruptcy or similar proceedings).

Other Uses and Disclosures

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with 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 authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of The Company and affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law. In some instances, we may combine Other Data with Personal Data (such as combining your name with your location). If we do, we will treat the combined data as Personal Data as long as it is combined.

As to all uses of the Personal Data of California residents, we believe we have shared your information as allowed by and as is consistent with the requirements of the CCPA.

Non-Company Group Entities

This Privacy Statement does not address, and we are not responsible for the privacy, data or other practices of any entities outside of The Company, including any third party operating any site or service to which the Services link, payment service, loyalty program, or website that is the landing page of the high-speed Internet providers at our properties. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data.

In addition, we are not responsible for the data collection, use, disclosure or security policies or 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, including with respect to any Personal Data you disclose to other organizations through or the Apps or our Social Media Pages.

Third Party Advertisers

We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the Online Services, other websites or online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags).

Sale of Personal Data

We do not sell your personal data to any third-person or entity.

Security

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "*Contacting Us*" section, below.

Choices, Access and Retention

You have choices when it comes to how we use your data and we want to ensure you have the information to make the choices that are right for you.

If you no longer want to receive marketing-related emails, you may opt out by following the instructions in any such email you receive from us.

We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from us, we may still send you important administrative messages, from which you cannot opt out.

Rights of California Residents under the CCPA

If you are a California resident, you may request that we disclose to you the following information covering the 12 months preceding your request:

The categories of Personal Data described above that we have collected about you and the categories of sources from which we collected such Personal Data.

The business or commercial purposes for collecting such Personal Data.

The categories of Personal Data about you that we have disclosed to third parties for a business purpose and the categories of third parties to whom we have disclosed such personal information

The specific pieces (e.g., copies) of Personal Data we have collected about you
California residents also have the right to submit a request for deletion of Personal Data under certain circumstances, although there may be legal or other reasons that we will retain your information.

In some instances, we may decline to honor your request. For example, we may decline to honor your request if we cannot verify your identity or confirm that the Personal Data that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, we may decline to honor your request where an exception applies, such as where the disclosure of Personal Data would adversely affect the rights and freedoms of another consumer or where the Personal Data that we maintain about you is not subject to the CCPA. Nonetheless, you have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

How can I update and access my information (Exercise my Data Subject Rights)?

If you would like to exercise any data subject right available to you under the EU General Data Protection Regulation (GDPR) or California Consumer Privacy Act (CCPA), including access, review, update, rectify, or delete any Personal Information that you have previously provided to us, you can contact us at privacy@pcfsi.com, or by mail:

PCFSI
Attention: Privacy
1000 Market Street, Bldg 1, Suite 300
Portsmouth, NH 03801 United States of America

Our Privacy team will examine your request and respond to you as quickly as possible. Please note that we may still use any aggregated and anonymized Personal Information that does not identify any individual and may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

For your protection, we only fulfill requests for the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before fulfilling your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we often need to retain certain data for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completion of such purchase, reservation, or promotion). We are also required to maintain certain data as required by applicable law, government agencies and law enforcement. There may also be residual data that will remain within our databases and other records, which will not be removed. In addition, there may be certain data that we may not allow you to review for legal, security or other reasons.

Retention

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services)
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations)

Sensitive Data

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., social security numbers, national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions).

Use of Services by Minors

The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services. However, to the extent you provide us any information as to minors, providing such information shall be your consent, on the minor's behalf, to our use and retention of this data.

Updates to This Privacy Statement

The "*Last Updated*" legend at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Online Services. Your use of the Services following these changes means that you accept the revised Privacy Statement. If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at privacy@pcfsi.com.

Contacting Us

The Company has asked PCFSI, as a vendor, to assist in providing the information contained in this Privacy Statement and assisting The Company in its compliance herewith.

If you have any questions about this Privacy Statement, please contact us at privacy@pcfsi.com, or by mail:

PCFSI
Attention: Privacy
1000 Market Street, Bldg 1, Suite 300
Portsmouth, NH 03801 United States of America

Because your email communications to us may not always be secure, please do not include credit card or Sensitive Data in your emails to us.