

PORTMARNOCK HOTEL & GOLF LINKS PRIVACY POLICY

Updated May 23rd, 2018

The Portmarnock Hotel & Golf Links values you as our guest and recognizes that privacy is important to you. We want you to be familiar with how we collect, use and disclose data.

This Privacy Statement describes the privacy practices of the Portmarnock Hotel & Golf Links for data that we collect:

- through websites operated by us from which you are accessing this Privacy Statement, including www.portmarnock.com
- 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 this Privacy Statement and through your communications with us
- when you visit or stay as a guest at our hotel, or through other offline interactions

Collectively, we refer to the website and our Social Media Pages, as the “**Online Services**” and, together with offline channels, the “**Services.**” By using the Services, within any outlet of the hotel (**Golf, Spa, Accommodation, Meetings and Events, Food and Beverage**) 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, we collect Personal Data within any outlet of the hotel (**Golf, Spa, Accommodation, Meetings and Events, Food and Beverage**) in accordance with 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, or data made available by linking your social media and loyalty accounts

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**”), obtained within any outlet of the hotel (**Golf, Spa, Accommodation, Meetings and Events, Food and Beverage**), 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

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 you permit us to use the data in accordance with this Privacy Statement.

How We Collect Personal Data

We collect Personal Data in a variety of ways within all outlets of the hotel (**Golf, Spa, Accommodation, Meetings and Events, Food and Beverage**):

- **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 Centres.** 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.
- **Owners and Franchisees.** We collect Personal Data from Owners of Portmarnock Hotel & Golf Links branded properties that we manage. We also collect Personal Data from Franchisees of Portmarnock Hotel & Golf Links branded properties that are independently owned and operated under a franchise agreement with us. Owners and Franchisees are independent from the Portmarnock Hotel & Golf Links.
- **Strategic Business Partners.** We collect Personal Data from companies with whom we partner to provide you with goods, services or offers based upon your experiences at our properties or that we believe will be of interest to you (“**Strategic Business Partners**”). Examples of Strategic Business Partners

include on-property outlets, travel and tour partners, time share partners, rental car providers and travel booking platforms. Strategic Business Partners are independent from the Portmarnock Hotel & Golf Links.

- **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 Portmarnock Hotel & Golf Links App or other program.

Collection of Other Data

“Other Data”, obtained through any outlets of the hotel (**Golf, Spa, Accommodation, Meetings and Events, Food and Beverage**), 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:

- **Your browser or device.** We collect certain data through your browser or automatically through your device, such as your 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) you are using. We use this data to ensure that the Online Services function properly.
- **Your use of the Apps.** We collect certain data when you download and use 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 that you are using. 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 your experience while using the Online Services and to recognize your computer to assist your 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 you and display them while you are using the Online Services or to send marketing emails. We also use cookies to track responses to online advertisements and marketing emails.

If you do not want data collected with cookies, you can learn more about controlling cookies at: <http://www.allaboutcookies.org/manage-cookies/index.html> .

You can choose whether to accept cookies by changing the settings on your browser or by managing your tracking preferences by clicking on “**Tracking Preferences**” located at the bottom of our home page. 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, and you will need to log in every time you visit. 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, which use cookies and technologies to collect and analyse data about use of the Services. These services collect data regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/ and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout> .
- **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.

CCTV

CCTV’s are installed both internally and externally on the premises for the principle purposes of enhancing security of the building and its associated equipment and improving health and safety standards.

The Company has a statutory responsibility for the protection of its people, property and equipment. It is important to provide a sense of security to employees and invitees to its premises.

The Company’s CCTV facility records images only. There is no audio recording i.e. conversations are not recorded on CCTV.

Recorded tapes are stored for a period no longer than 28 days and are then erased unless required as part of an ongoing investigation in court or similar proceeding.

Use of Personal Data and Other Data

We use Personal Data and Other Data to provide you with Services within all outlets of the hotel (**Golf, Spa, Accommodation, Meetings and Events, Food and Beverage**), to develop new offerings and to protect the Portmarnock Hotel & Golf Links 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.

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

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 to communicate with you 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.

Other Uses and Disclosures

We will use and disclose Personal Data within all outlets of the hotel (**Golf, Spa, Accommodation, Meetings and Events, Food and Beverage**), 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 Portmarnock Hotel & Golf Links, 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 if it is combined.

Non-Portmarnock Hotel & Golf Links 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 Portmarnock Hotel & Golf Links, including Franchisees, Owners, Authorized Licensees, Strategic Business Partners or 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.

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 of our [website](#).

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 e-mailing the Marketing department at marketing@portmarnock.com.

We will comply with your request within thirty (30) days of receiving the request.

How you can Access, Change or Suppress Your Personal Data

If you would like to review, correct, update, suppress, restrict or delete Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by law), you can contact us at marketing@portmarnock.com.

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have your Personal Data suppressed from our database, or other limitations you would like to put on our use of your Personal Data. For your protection, we only fulfil 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). 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 fulfil 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 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.

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 marketing@portmarnock.com.