

Privacy Policy Effective May 24, 2018

Golden Seahorse, LLC knows that you care how your information is used, and we appreciate your trust that we will use it carefully and sensibly. This notice describes our privacy policy. **By visiting us, you are accepting the privacy policy described below.**

1. What Personal Information Do We Collect?

“**Personal Information**” means information that is about any individual, or from which any individual is directly or indirectly identifiable, including but not limited to: name, gender, postal address, telephone number, email address, and in more limited circumstances we may also collect credit and debit card number, other payment data, limited financial information, or biometric data.

- **Information You Provide.** We may receive and store information you enter. For example, when you search for or buy a service, or when you supply information such as your address, phone number or credit card. You can choose not to provide certain information, but then you might not be able to take advantage of some of our features. We use the information that you provide for purposes such as responding to your requests, customizing future services for you, improving our website, and communicating with you. In addition, if you choose, we may share your Personal Information with other companies who provide goods or services that you are interested in. Please see the “opt-out” selection in Section 4 of this policy.
- We may collect or obtain Personal Information about you: directly from you (e.g., where you contact us); in the course of our relationship with you (e.g., if you make a purchase); when you make your Personal Information public (e.g., if you make a public post about a Golden Seahorse, LLC hotel on social media); when you visit our Management Services; when you download our brochure; when you request information; through a franchise company (if applicable); through business partners (e.g. online travel agents); and/or through social networking sites. We may also create Personal Information about you, such as records of your interactions with us.
- **Cookies.** Like many websites, we use "cookies". Cookies are small programs that we transfer to your hard drive that allow us to recognize you and to provide you with a customized experience. If you do not want us to use cookies, you can easily disable them by going to the toolbar of your web browser, and clicking on the “help” button. Follow the instructions that will prevent the browser from accepting cookies, or set the browser to inform you when you receive a new cookie. In addition, you may visit this and other websites anonymously through the use of utilities provided by other private companies.
- **Other Information:** Every computer has an IP (Internet Protocol) address. IP addresses of computers used to visit this site are noted. In addition, we automatically collect other information such as email addresses, browser types, operating systems, and the URL addresses of sites clicked to and from this site.
- **Information from Other Sources.** We might receive information about you from other sources and add it to our account information. This may include updated delivery and address information from our shippers or other sources so that we can correct our records and deliver your next purchase or communication more easily.

2. How Do We Use Your Information?

- **Customized Shopping.** We use your Personal Information to better serve you by providing a customized experience. As noted above, you may “opt-out” of this customization, or even visit anonymously. However, if you do not provide the data we request, we may not be able to provide you with the requested services.
- **Agents and Service Providers.** We may employ other companies (as agents, service providers, and/or third party business partners) and individuals to perform functions on our behalf and enhance your experience with our company. Examples include delivering packages, sending postal mail and e-mail,

providing customer service, processing payments, including credit card payments. Our agents, service providers, and third party business partners may have access to Personal Information needed to perform their functions, but may not use it for other purposes

- **Special Offers.** We may send you special offers from time to time, unless you choose to “opt-out” of receiving such offers. In addition, we may also send you special offers from other companies. Again, you may “opt-out”. If we send you offers from other businesses, we do not share your personal information with them. The offers come directly through us. Please see the “opt-out” selection at the end of this policy.
- **Business Transfers.** As we continue to develop our business, we might sell or buy assets. In such transactions, customer information generally is one of the transferred business assets. Also, in the unlikely event that we are acquired, customer information will be one of the transferred assets.
- **Third Party Business Partners.** We may disclose your Personal Information to Franchisors (if applicable) and third party business partners, such as the owners of Crescent managed hotel.
- **Law Enforcement.** If we receive a lawful court order to release account or other Personal Information, then we will comply with the law. We will also release information when necessary to protect the life, safety or property of others. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.
- **Retention.** We take every reasonable step to ensure that your Personal Information is only retained for as long as it is needed.
- **No Liability.** Golden Seahorse, LLC is not responsible for Personal Information that you volunteer about yourself in public areas such as on our websites or social media sites. This privacy policy does not cover the practices of third parties who may provide information about you to the Crescent Hotels Group. We may process: your personal details (e.g., your name); demographic data (e.g., your age); your contact details (e.g., your address); records of your consents; purchase details; details of your employer (where relevant); information about your interactions with our content or advertising; and any views or opinions you provide to us. We may also process information about you from your use of our services (e.g., the type of device you are using, the internet service provider, etc.), including your interactions with our content and advertising.

3. How Do We Protect the Security of Your Information?

- We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input.
- We use encryption to protect your information contained in our customer list.
- We use a firewall to protect against unlawful intrusion.
- We limit access to your Personal Information on a “need to know” basis.
- We reveal only the last five digits of your credit card numbers when confirming an order. However, we transmit the entire credit card number to the appropriate credit card company during order processing.
- It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when finished using a shared computer.
- No system can guarantee absolute security, just as the finest lock cannot guarantee physical security. However, we take every reasonable precaution to assure that your data is secure.

4. Your Choice: Opt-out.

It is your choice whether to receive emails, newsletters, online behavioral advertising or special offers (“Marketing”) from us. The following section provides you with this choice. Please note the default settings. To opt-out from receiving Marketing please send an email to ecommerce@crescenthotels.com and specify as follows:

- Subject line: Opt-Out Marketing
- In the body of the email please include:

- Your full name,
 - The email address where you received the special offer or advertising emails,
 - The specific hotel or related outlet you are opting-out of; and
 - Your opt-out request, for example:
 - Please do not send me email or other mail informing me of special offers of your products or services.
- **EU Residents.** GDPR provides certain rights for EU residents. You may decline to share certain information with us, in which case we may not be able to provide some of the features and functionality of the website. These rights include, in accordance with applicable law, the right to object to or request the restriction of processing of your Personal Information, and to request access to, rectification, erasure and portability of your own information. Where we process your Personal Information on the basis of your consent, you have the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any collection performed prior to the date on which we receive notice of such withdrawal, and does not prevent the Processing of your Personal Information in reliance upon any other available legal bases). Requests to withdraw your consent should be submitted by contacting us using the contact instructions specified below. We retain your Personal Information for the time necessary to accomplish the purpose for which such information was collected. You have the right to ask us to confirm whether we are processing your Personal Information, receive information on how your data is processed, obtain a copy of your Personal Information, request that we update or correct your Personal Information, and request that we delete Personal Information in certain circumstances by contacting us using the contact instructions specified below. If you are an EU resident and have any unresolved privacy concern that we have not addressed satisfactorily after contacting us, you have the right to contact the appropriate EU Supervisory Authority and lodge a complaint.

If the GDPR applies to you as an EU resident and you have a request that relates to your Personal Information, please send an email to ecommerce@crescenthotels.com and specify as follows:

- Subject line: GDPR
- In the body of the email please include:
 - Your full name,
 - The email address currently receiving special offer or advertising email,
 - The website or hotel that you believe is processing your Personal Information; and
 - Your request related to your Personal Information, for example:
 - I withdrawal my consent to process and use my Personal Information;
 - Please provide information on how my Personal Information is processed;
 - Please provide a copy of my Personal Information;
 - Please correct my personal information [and specify the correction needed]; *or*
 - Please delete my Personal Information.
- **California Residents:** Customers who reside in California and have provided their Personal Information to us can request, once per calendar year, information about our sharing of certain categories of Personal Information to third parties and within the Crescent Hotels Group, for their direct marketing purposes. Such requests should be submitted to us at 10306 Eaton Places, Suite 430, Fairfax, Virginia, 22030, and Attention General Counsel. We will provide a list of the categories of Personal Information disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties.
- Golden Seahorse, LLC reserves the right not to respond to Marketing, GDPR or California Residents' requests submitted to addresses other than the addresses specified in this Section 4.

5. Children

We do not sell products or services to children. If you are under 18, you may use this site only with involvement of a parent or guardian. We request that no minors provide us with Personal Information.

6. Non-related Entities and Other Websites

This privacy policy does not address, and we are not responsible for the privacy, data or other practices of any entities outside of Golden Seahorse, LLC, including franchise companies, Hotel owners, agents, business partners, or any third party operating any site or service to which may be linked to from this site. The inclusion of a link on this site 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 Information. If you link to another site, your privacy depends on the policy of that site. We strongly urge you to check their privacy policy. Not all sites guarantee that they will not share your personally identifiable information with others. You may also wish to consult privacy guidelines such as those recommended by the Online Privacy Alliance (www.privacyalliance.org).

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.

7. How this Privacy Policy May Change

We may change this Privacy Policy from time to time, and all changes will be effective at the time we post them. If we believe there is a significant change to this Privacy Policy or our data collection and use practices, we will indicate on our websites that our Privacy Policy has changed prior to the change becoming effective. The newly posted version of the Privacy Policy supersedes all prior versions. Your continued access to or use of the website or any of our services constitutes your acceptance of the revised Privacy Policy then in effect.