



ALEXANDER HOTELS

Utopia Leisure Ltd. Privacy Policy

Privacy Policy

Author: Utopia Leisure Ltd.

Revision Date: 13/02/2018

Version: V1.4

UTOPIA LEISURE LTD.

PRIVACY POLICY

Revision History

<i>Version</i>	<i>Revision Date</i>	<i>Revised by</i>	<i>Section Revised</i>

Document Control

1 GLOBAL PRIVACY & SECURITY POLICY

Utopia Leisure Limited are committed to providing you with an efficient and customized Internet experience. This online Privacy and Security Policy describes the information we collect through our websites and personal devices, how we use that information, and how we protect your personally identifiable information. This policy also sets forth our practices for obtaining personal information from other sources, such as written or verbal communications or information collected at a hotel.

By submitting your personal information to us, you agree to the transfer to and processing of your personal information in the United Kingdom in accordance with the terms of this Policy.

2 WHAT INFORMATION DO WE COLLECT?

Our websites and mobile applications may receive and store information based on your browser settings, which may include your browser type and operating system, the various Alexander Hotels web pages you view, Internet Protocol addresses, unique device identifiers, and sites visited before viewing our websites. When applicable, we may compensate other websites that include links to our websites. If you have enabled the location settings on your device while our mobile app is open, we may also receive your precise geo-location information. If you have location settings turned off while our mobile app is open, we may receive your general location (country, state, city) information.

When you use our reservation system, call our reservation telephone number, book using our online spa booker, create an online account, elect to receive offers, or purchase a gift vouchers, we collect personally identifiable information and other information that you supply, such as your name, address, telephone number, e-mail address, room preference, credit card details, day and month of your birth. We may also ask for additional information such as personal interests.

We may occasionally conduct sweepstakes and contests that offer you the opportunity to win prizes. As part of entering a sweepstakes, certain personally identifiable information such as name, mailing address and e-mail address's may be requested.

Children's Privacy: Our websites are not intended for children and we do not knowingly solicit or collect personal information for persons under the age of 18.

3 HOW DO WE USE THE INFORMATION WE COLLECT?

We do not sell, trade, rent, or release your personal information to anyone outside our company, contractors or affiliates, other than in compliance with this privacy and security policy. We and our affiliates use the personal information to administer our business activities, provide customer service, personalize your digital experience, contact you concerning your stay with one of our properties, and make other products and services available to you. We share your information with credit card issuers, and other companies where necessary to complete your transaction. We may also use your information to send you promotional communications by mail or e-mail, or through our mobile apps, or share your information with our business partners.

4 RESERVATIONS

We maintain a centralized reservations system that retains your personally identifiable information when you make a reservation via our worldwide accessible websites, mobile apps, our call centres, and third-party travel agents and travel websites that connect to our reservation system. The personal information collected in the reservation system is needed to secure and process your reservation. Your personally identifiable information (including credit card number) will be processed primarily in the United Kingdom to complete your transaction and to facilitate the making of future reservations. Only that personal information which is reasonably required to facilitate your reservations is collected and shared.

We will use your e-mail address to send a confirmation and, if necessary, might use the other information to contact you regarding your reservation. We may also use your e-mail address to send you travel-related messages, stay details, and provide other information about the area and the property to which your reservation is made to notify you about special offers and promotions; and send you periodic satisfaction or market research surveys.

Such information may also be sent to you through our mobile apps, if you elect to receive notifications and alerts.

5 MARKETING, SWEEPSTAKES & CONTESTS

- We may use your personal information to send you via e-mail, telephone, mobile app or postal mail promotions, surveys, third party offers, sweepstakes and contests.

5.1 OTHER USES OF PERSONAL INFORMATION

To serve you better, we may combine information you give us online through the mail, or in any other way. We may also combine that information with publicly available information and information we receive from others or cross-references. We that combined information for the purposes described in this privacy statement.

To the extent required or permitted by law, we may collect, use and disclose personal information in connection with security-related or law enforcement investigations or during cooperating with authorities or complying with legal requirements. We may also use your information as permitted by law to perform credit checks, report or collect debts owed, or protect the rights or property of Alexander Hotels, our employees, our customers, this site, or its users.

6 DO YOU SHARE MY PERSONAL INFORMATION WITH THIRD PARTIES?

As noted above under "Reservations", Alexander Hotels may need to transfer your personal information to selected third party companies to secure your reservation. Please note that some hotels may be in countries other than your country of residence and may not provide an equivalent level of data protection.

Alexander Hotels distributes personal information to third party service providers such as web analytics companies, market researchers and fulfilment houses. We also use such third parties to: (i) conduct data processing for (ii) engages in e-mail and direct mail communications on behalf of Alexander Hotels, (iii) administer sweepstakes and contests, (iv) administer guest surveys, (v) compile information for us about the type and frequency of guest stays and (vi) compile information for us about the use of Alexander Hotel's websites and mobile apps. These parties are contractually prohibited from using personally identifiable information for any purpose other than the purpose that Alexander Hotel's specifies.

Alexander Hotel's may partner with other companies to provide co-sponsored or co-branded promotions, sweepstakes, contests, products and services and may share your information with these companies.

Although unlikely, in certain instances, Alexander Hotel's may disclose your personally identifiable information when Alexander Hotel's has reason to believe that it is necessary to identify, contact or bring legal action against persons or entities who may be causing injury to you, to Alexander Hotel's or to others. Alexander Hotel's may also disclose your personally identifiable information when Alexander Hotel's believes the law requires it.

We may disclose your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Alexander Hotel's makes every reasonable effort to maintain the accuracy of personal information. If you become aware that information Alexander Hotel's maintains about you is incorrect or if you would like to update your information, please contact us as indicated above.

7 HOW DO YOU STORE AND SECURE MY PERSONAL INFORMATION?

Our reservation system and other databases are maintained in the United Kingdom; therefore, your personal information will be collected (or transferred) and maintained in the United Kingdom. Once your information reaches us, we treat it as confidential and protect it through a variety of generally accepted industry standards.

When you provide us with information through this site, such as your name, address, phone number, credit card information and room preference, your information will be encrypted using a Transport Layer Security or a Secure Sockets Layer connection. You can tell if your information is encrypted by looking for the locked padlock icon on the lower right-hand or left-hand corner of your screen and a change in the site address from "http" to "https."

8 DO YOU USE INTEREST-BASED ADVERTISING?

Alexander Hotel's partners with third party ad networks to either display advertising on Alexander Hotel's or to manage its advertising on other sites. Alexander Hotel's ad network partners use cookies and web beacons to collect non-personally identifiable information about your activities on Alexander Hotel's website and other sites to provide you targeted advertising based upon your interests.

If you would like to know more about cookies, the website www.allaboutcookies.org provides useful information.

We also work with third parties that use tracking technologies on our Web sites in order to provide tailored advertisements on our behalf and on behalf of other advertisers across the Internet. These companies may collect information about your activity on our sites and your interaction with our advertising and other communications and use this information to determine which ads you see on third party websites and applications.

9 WHAT ABOUT CHANGES TO THE PRIVACY AND SECURITY POLICY?

By using our site you consent to our collection and use of your personal information as described in this policy. Alexander Hotel's reserves the right to modify this privacy and security policy and related business practices at any time by posting updated text on this site. Any changes to this policy become effective upon posting of the revised policy to this site. Use of the site following such changes constitutes your acceptance of the revised policy then in effect.

10 WHAT IF I HAVE QUESTIONS OR CONCERNS?

Thank you for visiting our site and for taking the time to read this policy. If you have questions about this policy or complaints about how we collect, use, disclose, store or protect your personal information as directed by the laws and regulations applicable to your region, we can be reached by email at DPO@alexanderhotels.com