

PRIVACY POLICY FOR SAN VICENTE RESORT AT SAN DIEGO COUNTRY ESTATES GUESTS

Introduction

Your privacy is important to us, and we collect and maintain your personal information for the purpose you gave to us, all of which is for us to create and maintain our relationship and to fulfill our commitment in providing an excellent guest service experience.

We value your right to privacy and we work to safeguard the privacy of the personal information you provide.

As one of our guests, you understand and agree that we collect and use your personal information in accordance with this Privacy Policy for Guests (this "Policy").

What is the Application of this Policy?

This Policy pertains to personal information regarding our guests that we do business with or who visit us, and it explains how we use the personal information in any form – whether oral, electronic or written.

This Policy gives effect to San Vicente Resort at San Diego Country Estates' commitment to protect your personal information. References to "SDCEA", "SVR", "we" and "our" throughout this Policy, depending upon the context, collectively refer to those separate and distinct legal entities, including the entity with which you have made your booking.

The Information We Collect

The term "personal information" in this Policy refers to information which does or can identify you as an individual. The types of personal information that we request include:

- your name, gender, home and work contact details, business title, and date of birth;
- your guest stay information including date of arrival and departure, any goods and/or services purchased including golf rounds, golf membership, dining preferences, special requests made, observations about your service preferences (including equipment preferences, room and holiday preferences), and;
- your online user account details and profile details;
- any information necessary to fulfill special requests (e.g., health conditions that require specific accommodations, such as allergies, purchase of goods and services);
- information you provide regarding your marketing/communication preferences or while participating in surveys, contests or promotional offers;
- contact and other relevant details concerning the employees of corporate accounts and vendors and other individuals with whom we do business (e.g., travel agents or meeting and event planners); and
- in limited cases, information relating to the credit of customers.

Most of the personal information we request is information that you or someone acting on your behalf knowingly provides to us. However, in some instances, we process personal information that we can infer about you based on other information you provide to us or on our interactions with you.

How We Use Personal information

Subject to applicable laws, we may collect, use and disclose relevant portions of your personal information in order to:

- provide and charge for the hotel accommodation and other goods and services you purchase;
- provide you with a better, more personalized level of service;
- conduct market research, customer satisfaction or quality assurance surveys, direct marketing and sales promotions;
- respond to requests for information and services;
- provide for the safety and security of staff, guests and other visitors;
- administer general record keeping;
- meet legal and regulatory requirements; and
- process credit applications (in the context of San Vicente Golf Membership).

Disclosure of Your Personal information

From time to time, we may disclose your personal information. We would always make that disclosure in accordance with applicable law. Circumstances where we might make such disclosure include:

- a) Our Agents, Service Providers and Suppliers - We may engage market research firms to assist us in contacting guests to perform market research and quality assurance. When we do outsource to third parties, we oblige those companies to protect your personal information with appropriate security measures and prohibit them from using your personal information for their own purposes or from disclosing your personal information to others.
- b) Legal Requirements - We reserve the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting, tax rules and regulations and any specific record retention laws.

Information We Collect When You Visit Us Online

If you choose to obtain information or do business with us online by visiting www.sdcea.net or www.sanvicenteresort.com, you may wish to know the following:

You Can Browse Without Revealing Your Identity

You can always visit our websites without revealing who you are or providing any personal information.

Usage Information

When you visit our websites, we collect usage information (i.e., the Internet Protocol address automatically assigned to your computer each time you browse the Internet, the date and time of your visit, the type of Internet browser you use and the URL of any other website that referred you to our website, and the pages you access and the amount of time you spend on each page), but that information is not linked to you as an individual unless you create a user profile. We use this information to evaluate and improve the features, guest experience and functionality of our websites.

Cookie Technology

We use “cookie technology” on our websites to allow us to evaluate and improve the functionality of our websites. Cookies by themselves cannot be used to reveal your identity. They identify your browser, but not you, to our servers when you visit our websites.

If you do not want to accept cookies, you can block them by adjusting the settings on your Internet browser. However, if you block them, you will not be able to use all of the features of our websites, including the customization features associated with creating a user profile.

Further information about cookies and how they work is available at allaboutcookies.org.

Security

Because the security of your personal information is important to us, we use Secured Socket Layer (“SSL”) software with up to 128-bit encryption to encrypt the personal information that you provide to us. If your browser is SSL enabled (which most are), your transmission of personal information to us online will be encrypted.

The personal information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law. Due to the nature of the Internet and computer security, we cannot guarantee that security will never be breached. We therefore encourage you to protect your Username and password and not divulge it to anyone.

Minor Children

Our websites do not sell products or services for purchase by children. If you are under the age of 18 (or a minor in the jurisdiction in which you are accessing our websites), you may only use our websites with the involvement of a parent or guardian.

Choice

You may always choose what personal information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected (for example, we cannot take a reservation without a name).

If you provide us with your contact details (e.g., postal address, email address, telephone number or fax number), we may contact you to let you know about the products, services, promotions and events offered that we think you may be interested in. You can always choose whether to receive any or all communications by contacting us as described below or following the “unsubscribe” instructions contained in the communications.

We will abide by any request from you not to send you direct marketing materials. When such a request is received, your contact details will be “suppressed” rather than deleted. This will ensure that your request is recorded and retained unless you provide a later consent that overrides it.

Updating or Accessing Your Personal Information

With some limited exceptions, you have rights to access and update personal information held about you. If you want to inquire about any personal information or change personal information we may have about you, you can do so by sending us a written request by letter or email to the addresses set out below. Please be sure to include your full name, address and telephone number and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information, we may require making that determination.

Changes to this Policy

Just as our business changes constantly, this Policy may also change. To assist you, this Policy has an effective date of July 22, 2017.

Request for Access to Personal Information/Questions or Complaints

If you have any questions about this Policy, changes to the Policy or any concerns or complaints regarding the administration of the Policy, or if you would like to submit a request for access to or change of the personal information that we maintain about you, please contact us by any of the following means:

- by calling our toll-free reservation number 800-776-1289;
- by mail at San Vicente Resort at the San Diego Country Estates, Attn: Marketing & Support, 24157 San Vicente Road, Ramona, CA 92065, United States; or
- by contacting the Marketing & Support Department via email support@sdcea.net ;

If you are not satisfied with the response that you receive, you can escalate your concern to the General Manager by emailing general.manager@sdcea.net.

While this Policy alone does not create contractual rights, San Vicente Resort at San Diego Country Estates has ensured compliance with some of its legal obligations in relation to personal information by creating a set of binding Standards and Policies. All requests for access to your personal information must be submitted in writing by letter or email. We may respond to your request by letter, email, telephone or any other suitable method.

Policy Effective Date: July 22, 2017