



This policy pertains to personal information regarding our owners and 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 is used.

Privacy is important. Personal information is collected and maintained for, and in the course of business for the purpose in which it was given, all of which to create and maintain positive business relationships and to provide an excellent guest service experience. This policy provides the details regarding the information collected and the methods used to protect it.

It gives effect to our commitment to protect 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 any bookings have been made.

INFORMATION WE COLLECT

The term “personal information” in this policy refers to information which does or can identify an individual. The types of personal information that may be requested includes:

- Full name, gender, home and work contact details, business title, and date of birth;
- 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 service preferences (including equipment preferences, room and holiday preferences), and;
 - 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 provided regarding marketing/communication preferences or while participating in surveys, contests or promotional offers.
 - Financial information (such as credit and debit card number or other payment data).
 - Government-issued identification data.
 - Employer details (for business-related bookings).
 - Travel itinerary, tour group, or activity data.
 - Social media account ID, profile photo and other data publicly available, or data made available by linking social media and loyalty accounts.
 - 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,

San Diego Country Estates and San Vicente Resort websites do not collect, save, or store any personal information from our owners and guests while simply browsing the websites, unless the owner or guest voluntarily and intentionally provide it (for example, by making an online booking or requesting further information).

Most of the personal information requested is information that the owner or guest or someone acting on your behalf knowingly provides to us. However, in some instances, personal information can be inferred about the owner or guest based on other information provided during interactions made with the owner or guest.

HOW PERSONAL INFORMATION IS USED

Personal information will not be sold to any outside organization. Aggregate information about our customers, and information that does not identify any individual, may be disclosed without restriction. Subject to applicable laws, relevant personal information can be collected, used and disclosed in order to:

- Provide and charge for the hotel accommodation and other goods and services purchased.
- Provide a better, more personalized level of service.
- Prevent and detect fraud.
- 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 and meet legal and regulatory requirements.
- Processing necessary to comply with professional, legal and regulatory obligations that apply to business.
- Comply with any court order, law, or legal process, including to respond to any government or regulatory request.

LINKS TO THIRD PARTY WEB SITES

Third-party websites, available through links on SDCEA or SVR websites each have separate privacy and data collection practices. We have no control, responsibility or liability for these third-party websites or their applicable policies or content. San Vicente Resort and San Diego Country Estates Association cannot ensure or warrant the security of any information disclosed on third-party sites.

INFORMATION COLLECTED THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES

Automatic data collection technologies are used, as the owner or guest navigates through and interacts with the SDCEA and SVR websites, to collect certain information about the equipment used, browsing actions and patterns, including:

- Details of the visit to the websites or mobile applications (“usage data”), including traffic data, location data, logs and other communication data and resources that are accessed and used on the websites.
- Information about the computer and internet connection used, including the IP address, operating system, unique device ID, referral URLs and browsing type.

The technologies used for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of the computer. The user may refuse to accept browser cookies by activating the appropriate setting on the browser. However, if this setting is selected certain parts of the websites may be inaccessible. The system will use cookies when the browser accesses the websites unless the computers browser has been set to refuse cookies.
- Flash Cookies. Certain features of the websites may use local stored objects (Flash cookies) to collect and store information about the user's preferences and navigation to, from and on the websites. Flash cookies are not managed by the same browser settings and are used for browser cookies.
- Web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit, for example, to count users who have visited those pages or opened an email and for other related website statistics

(for example, recording the popularity of certain website content and verifying system and server integrity).

Third-party advertising technologies used will also serve ads. While serving our advertisements, unique third-party persistent cookies, clear gifs, or beacon gifs may be placed on the user's computer or device to help manage online advertising, recognize when a device visits a website, learn which ads bring users to our websites, and track whether a reservation is made. The information is collected by ad-serving providers through this technology is not personally identifiable but is used to create an anonymous profile which allows the ad-serving provider to serve ads targeted towards you and your interests across the ad-serving network.

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

SECURITY

Because the security of personal information is important, Secured Socket Layer ("SSL") software with up to 256-bit encryption to encrypt the personal information that is provided to us. If the browser is SSL enabled (which most are),-transmission of personal information to us online is encrypted.

The personal information we collect 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.

MINOR CHILDREN

SDCEA and SVR websites and services are not intended for children under 16 years of age, and do not knowingly solicit or collect personal data from children. Children under the age of 18 (or a minor in the jurisdiction in which the websites are being accessed) should be supervised by a parent or guardian.

CALIFORNIA RESIDENTS

California consumers have the right to request any of the following information regarding personal information collected.

- The categories of personal information collected about the requestor.
- The categories of sources from which the personal information is collected
- The business or commercial purpose for collecting or selling personal information
- The categories of third parties with whom we share personal information, if any.
- The specific personal information collected about the requestor.
- For personal information disclosed to a third-party for a business purpose, the categories of personal information and, the categories of third parties to whom the personal information was disclosed; and the categories of a personal information used for a business purpose.

This information will be provided free of charge up to two (2) times in any twelve (12) month period within 45 days of receiving a verifiable request (including verification of identity and California residency), subject to delays and exclusions permitted by law. Specific personal information that is categorized as sensitive or confidential may be redacted.

California residents have additional rights regarding personal information:

- Deletion – The right to request that any personal information collected about the California resident be deleted. This request will be honored subject to the range of exclusions permitted by law. For example, if the personal information is necessary to complete a transaction or reasonably used for an ongoing business relationship or if it is used internally in a lawful manner that is compatible with the context in which the consumer provided the information, it will not be deleted.

Correction – The right to request that we correct any inaccurate personal information that we maintain about the California resident.

CHOICE

The owner or guest may choose what personal information (if any) to provide. Certain details may be required (for example, we cannot take a reservation without a name).

If contact details (e.g., postal address, email address, telephone number or fax number) are provided, SDCEA and SVR may send communications regarding the products, services, promotions, and events offered. All communications provide the opportunity to opt-out of receiving such information, by selecting unsubscribe. 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.

DISCLOSURE OF PERSONAL INFORMATION

Circumstances where disclosure may occur include:

SDCEA and SVR may engage market research firms to assist in contacting guests to perform market research and quality assurance. When we do outsource to third parties, we oblige those companies to protect 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.

Legal Requirements – San Diego Country Estates and San Vicente Resort reserves the right to disclose any personal information concerning the owner or guest if compelled to do so by a court of law or requested to do so by a governmental entity or if it is determined necessary or desirable to comply with the law or to protect or defend SDCEA or SVR 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.

Owners Membership List – San Diego Country Estates Association is legally required to keep a record of its owners containing the owner’s name, property address, mailing address and email address. This information can be requested by another owner with the purpose and intent that is reasonably related to the interest of the ownership. The request to inspect the membership list must be made in writing. (Cal. Civil Code §5200 and §5205) Any member wishing to opt-out of this type of disclosure must notify the SDCEA in writing of their preferred method of contact and it shall remain in effect until changed by the owner.

UPDATING OR ACCESSING PERSONAL INFORMATION

Owners can send a written request or email with any changes regarding personal information. Annually, a formal request is sent to each property owner to update their contact information. Any additional information can be reviewed or updated. The owner will need to include the full name, property address, mailing address,

email address and telephone number and a copy of a document to verify identity (such as an ID card or passport).

Guests and visitors may, with some limited exceptions, access and update the information provided to SDCEA or SVR, by sending a written request by U.S. Mail or email to the addresses provided below, to inquire about any personal information or to change and update any personal information. The owner, guest or visitor will need to include the full name, address and telephone number and a copy of a document to verify identity (such as an ID card or passport).

REQUEST FOR ACCESS TO PERSONAL INFORMATION/QUESTIONS OR COMPLAINTS

Questions, changes, concerns or complaints about this Policy, or to submit a request for access to or change of the personal information:

- By calling our reservation number 1-760-789-8290
- 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.

Approved by the SDCEA Board of Directors, January 23, 20233