

PRIVACY & COOKIES POLICY

This Privacy & Cookies Policy applies to your interactions with Town and Country San Diego or with any of its respective subsidiary companies whose websites you access and which cause this Privacy & Cookies Policy to be displayed (respectively referred to as “we”, “us” or the “Company” in this policy), including, without limitation, your interaction with us at <http://www.towncountry.com> or any other websites, applications, online services, or interactive features or downloads that post a link to this Privacy & Cookies Policy, however accessed (the “Services”). This Privacy & Cookies Policy explains our information collection practices, such as the types of information we collect and how we may use that information. Please review this Privacy & Cookies Policy carefully. In addition, please review the Terms and Conditions, which governs your use of the Services.

PRIVACY POLICY OVERVIEW

This initial summary of our Privacy Policy highlights some important points regarding collection and sharing of your information and third parties who may set cookies and collect information through the Services. Please review our full Privacy Policy below before using the Services.

- 1. Use of Information:** We primarily use the information we collect through the Services in connection with your use of the Services and to communicate with you regarding news, special offers and other information.
- 2. Sharing of Information:** We may share the information we collect through the Services with our vendors and third party business and marketing partners, including companies who sponsor and offer sweepstakes, contests and similar promotions through the Services. We may also share information about you for legal and business reasons. If you are a California Resident, you may request additional information
- 3. Third Parties Collecting Information Through the Services:** The Services may contain content served by third parties, including videos and advertisements, and we work with third party service providers to serve advertisements on the Services and elsewhere online. In connection with providing content and services, third parties may collect certain information about you and your visits to this or other web sites and we may receive information regarding the use of the Services and the effectiveness of our advertisements. These advertising networks, advertisers, ad agencies, analytics service providers and other vendors may set and access their own tracking devices (including cookies and web beacons) and they may otherwise collect or have access to information about you and your online browsing activities.

INFORMATION COLLECTION

Registration and Other Information You Provide

The Services may collect "Personal Information" (information that identifies you as a specific individual, such as your full name or e-mail address), account information (password or other information that helps us confirm that it is you accessing your account) and demographic or other information (such as your ZIP or postal code and information about your interests and preferences). If we combine demographic or similar information with the Personal Information we collect, we will treat it as Personal Information under this Privacy Policy.

The Services are general audience services and are not intended for individuals younger than the age of 13. We do not knowingly collect Personal Information from individuals younger than the age of 13 through our online services. If we discover that we have inadvertently collected personal information online from anyone younger than the age of 13, we will use commercial reasonable efforts to delete that information.

Information Third Parties Provide About You

We may receive information about you from third parties. We may combine this information in our database and we may use it to offer you products or services, or for similar purposes. We also may supplement the information we collect with outside records from third parties. If we combine the information we receive from others with information we collect through the Services, we will apply this Privacy Policy to the combined information.

Social Media/Integration with Third Party Platforms

The Services may permit you to interact with a third party site or service, such as enabling you to "like" us on another site or "share" content from Services with other sites (a "Social Networking Service"). If you choose to "like" or "share" content or to otherwise post information from or via the Services to a Social Networking Service, that information may be publicly displayed, and the third party may have access to certain information about you and your use of the Services. Similarly, if you interact with us through a Social Networking Service, we may have access to information about you (for example, if you "like" or "follow" our page on a third party site). Please note that if you mention or comment about us or the Services in your post to a third party platform, the third party platform may allow us to publish your post on the Services.

You may also choose to use a social media tool offered by a third party, but available on Services (such as posting a review or logging into the Services with your username and password for another site). Use of such a feature may allow us to collect (or the third party to share) information about you, including Personal Information. When you choose to use a social media tool available on a Service, you may be opting to link your activities on the Services with a third party site or service. That third party may collect information about your visits to the Services and may publish that activity to your profile or similar feature on that third party site. The information that we collect is subject to this Privacy Policy. The information collected and stored by the third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us, the types of information shared, and your choices with regard to what is visible to others on that third party site.

To manage the information that we may receive about you from a Social Networking Service, you will need to follow the instructions provided by the Social Networking Service. Once we receive your information from a Social Networking Service, that information is stored and used by us in accordance with this Privacy Policy.

User Content

The Services may provide you the opportunity to post content publicly through interactive features. You may choose, through such features or otherwise, to submit or post reviews, comments, photographs, audio files, video files, and suggestions related to the Services or otherwise post free-form comments (collectively, "User Content"). Please note that certain information, such as your name and state of residence, and a link to any website URL you provide may be publicly displayed by the Services along with your User Content. However, we will not publish your e-mail address or other contact information with these comments.

Note that any User Content you post is public – others will have access to your User Content and may read, see, use, and/or share it with third parties. If you choose to voluntarily disclose Personal Information in your User Content, that information will be considered public information and the protections of this Privacy Policy will not apply. If you submit User Content, it may be published online or offline (including through the Services, on-air, in a recording medium (such as a DVD), or any other medium or format currently existing or later developed). In addition, we may use your User Content and any excerpt from your User Content in connection with our advertising, marketing, publicity, and promotional activities.

Information We Collect Automatically

We and our third party service providers (including analytics providers, advertising companies and third party content providers), may automatically collect certain "Usage Information" whenever you visit or interact with the Services. "Usage Information" typically includes the

browser and operating system you may be using, the URL or advertisement that referred you to the Services (if applicable), the search terms you entered into a search engine that lead you to the Services (if applicable), all of the areas within the Services that you visit, and the time of day you used the Services, among other information relating to your use of the Services. We may use Usage Information for a variety of purposes, including analyzing and improving the Services and products, to provide special offers, and to select content to display to you.

In addition, we automatically collect your internet protocol (IP) address, mobile device identifier or other unique identifier ("Device Identifier") for any computer, mobile phone or tablet, or other device you may use to access the Services. A Device Identifier is a number that is automatically assigned or connected to the device you use to access a Service, and our servers identify your device by its Device Identifier. Some mobile service providers may also provide us or our third party service providers with information regarding the geographic location of the device used to access a Service. Usage Information is generally non-identifying, but if we associate it with you as a specific and identifiable person, we treat it as Personal Information.

Note that your browser settings may allow you to automatically transmit a "Do Not Track" signal to websites and online services you visit. There is no consensus among industry participants as to what "Do Not Track" means in this context. Like many websites and online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. To find out more about "Do Not Track," please visit www.allaboutdnt.com.

HOW WE USE INFORMATION ABOUT YOU

We may use information about you, including Personal Information and Usage Information, to:

1. process a transaction, including your registration with the Services and verifying information you provide is active and valid;
2. allow you to participate in features we offer or to provide related customer services (for example, to respond to your questions, complaints or comments);
3. tailor content, recommendations and offers we display to you on the Services and elsewhere online;
4. send you information regarding us or information from us relating to a third party, including our parent and affiliated companies;
5. improve the Services and our products, including asking you to participate in surveys, and for other internal business purposes;
6. contact you with regard to your use of the Services including, in our discretion, changes to our policies; and

7. as described in this Privacy & Cookies Policy and for purposes disclosed at the time you provide your information or otherwise with your consent.

INFORMATION SHARING

We may share non-Personal Information, such as aggregate user statistics, demographic information and Usage Information with third parties, including advertisers, content providers, and analytics providers, in our discretion and for a variety of purposes. We also may share the information we have collected about you, including Personal Information, as described in this Privacy & Cookies Policy, including the following.

Third Party Marketing Partners: We may share the Personal Information we collect through the Services with our subsidiaries and affiliates, and with third party business and marketing partners, including companies who sponsor and offer sweepstakes, contests and similar promotions through the Services. Those third parties may reach out to you for their own marketing purposes.

Sweepstakes, Contests and Promotions. We may work with third parties that sponsor or offer sweepstakes, contests, and other promotions. By participating in a promotion, you are agreeing to the terms, conditions or official rules that govern that promotion, which may contain specific requirements of you, including, except where prohibited by law, allowing us and the sponsor(s) of the promotion to use your name, voice, likeness or other indicia of persona in advertising or marketing. If you choose to enter a promotion, Personal Information may be disclosed to third parties or the public in connection with the administration of such promotion, including, without limitation, in connection with winner selection, prize fulfillment, and as required by law or permitted by the promotion's official rules, such as on a winners list.

Third Parties Providing Services on Our Behalf. We may provide third parties with access to user information, including Personal Information, in order for them to perform certain services on behalf of us or you, such as fulfilling and processing contest entries, tracking analytics, sending communications on our behalf or performing other administrative services.

Administrative and Legal Reasons. We may also transfer and disclose user information, including Personal Information, to third parties: (i) in the event we are required to respond to subpoenas or other legal process or if in our opinion such disclosure is required by law; (ii) at the request of governmental authorities conducting an investigation; or (iii) to protect and/or defend the Terms and Conditions or other policies applicable to the Services or to protect the personal safety, rights, property or security of the Services or any individual. We may also use Device Identifiers, including IP addresses, to identify users, and may do so in cooperation with

copyright owners, Internet service providers, wireless service providers or law enforcement agencies in our discretion.

Business Transfers. We may share Personal Information with our parent, and with our subsidiaries and affiliated entities primarily for business and operational purposes. We reserve the right to disclose and transfer all information related to the Site, including Personal Information: (i) to a subsequent owner, co-owner or operator of the Sites or one of our databases; or (ii) in connection with a corporate merger, consolidation, restructuring, the sale of certain of our ownership interests, assets, or both, or other company change, including, without limitation, during the course of any due diligence process.

THIRD PARTY AD NETWORKS, ANALYTICS PROVIDERS AND SIMILAR THIRD PARTIES

The Services may contain content served by third parties, including videos and advertisements, and we may work with vendors (including network advertisers, ad agencies, and analytics companies) to provide us with information regarding traffic on the Services, to serve our advertisements through the Services and elsewhere online, and to provide us with information regarding the use of the Services and the effectiveness of our advertisements. In connection with serving content and providing analytics and advertisement services, third parties may collect certain information about you and your visits to the Services or other web sites. These third parties may set and access their own tracking technologies (including cookies and web beacons) and may otherwise collect or have access to your Device Identifier and information about your visits to and activity on the Services, as well as other web sites or online services. Some of these third parties may collect Personal Information over time when you visit the Service or other websites and services.

Cookies and web beacons, including those set by third party network advertisers, may be used to, among other things, target advertisements, prevent you from seeing the same advertisements too many times and to conduct research regarding the usefulness of certain advertisements to you. We may share Device Identifier and Usage Information about visitors with third party advertising companies, analytics providers and other vendors for similar purposes. While we may use a variety of service providers to perform advertising and analytics services, some of these companies are members of the Network Advertising Initiative ("NAI") or the Digital Advertising Alliance ("DAA") Self-Regulatory Program for Online Behavioral Advertising. You may want to visit http://www.networkadvertising.org/managing/opt_out.asp which provides information regarding targeted advertising and the "opt-out" procedures of NAI members. You may also want to visit or <http://www.aboutads.info/choices/>, which provides information regarding targeted advertising and offers an "opt-out" by participating companies in the DAA Self-Regulatory Program. Please note opting out through these mechanisms does

not opt you out of being served advertising. You will continue to receive generic ads while online.

UPDATING YOUR ACCOUNT

You are responsible for maintaining the accuracy of the information you submit to us. You may review and update the information you have provided to us through your account on the Services. We will make good faith efforts to make requested changes in our then active databases. If you make changes, information may persist internally for administrative purposes and that residual data may remain on backup media or for other reasons. Note, however, that if you have made any public postings on or through the Services, those posts usually will not be removed.

The Services may contain web pages or other features through which you may be able to unsubscribe or modify the e-mail messages or similar communications we send to you. You can choose to opt out of receiving marketing e-mails by following the opt-out instructions provided to you in those e-mails. Please note that we reserve the right to send you certain communications relating to your account or use of the Services (for example, administrative and service announcements) and these transactional account messages may be unaffected if you opt-out from marketing communications. If you sign up to receive SMS or MMS messages that may be offered through the Services, you may unsubscribe from any text messages by replying "STOP."

THIRD PARTY CONTENT AND OUR CONTENT FOUND OUTSIDE THE SERVICES

Certain content on the Services may be hosted and served by third parties and us. The Services may contain links to third party web sites that we do not control. For example, the Services may provide links to third party sites through which you can purchase merchandise, products or services or which link to a product or service offered by a third party. The Services may also contain certain third party applications, such as email, web browser toolbars, wallpapers or other downloads or software applications. These third parties may collect Site Usage Information through the use of their own cookies and web beacons, independently collect data or solicit Personal Information, and may have the ability to track your use of their sites and services.

Certain content you see on the Services is provided by third parties. The Services may link to third party web sites, online services or other content. In addition, you may see our content on third party web sites or elsewhere online. These third parties may independently collect data. We are not responsible for the privacy practices or business practices of any third party.

SECURITY

We take commercially reasonable security measures to protect the Personal Information submitted to us, both during transmission and once we receive it, including encryption of Personal Information transmitted over the Internet. However, no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee the security of any information you submit and you do so at your own initiative and risk.

CONSENT TO TRANSFER

We are a United States company. If you are located outside the United States, please be aware that information we collect will be transferred to and processed in the United States. By using the Services, or providing us with any information, you fully understand and unambiguously consent to this transfer, processing and storage of your information in the United States, a jurisdiction in which the privacy laws may not be as comprehensive as those in the country where you reside or are a citizen.

CHANGES TO THIS PRIVACY & COOKIES POLICY

We may update this Privacy & Cookies Policy at any time and any changes will be effective upon posting. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy & Cookies Policy. In the event that there are material changes to the way we treat your Personal Information, we will provide notice through the Services and we may also notify you by email or through other contact mechanisms we have for you in our sole discretion. Please check this Privacy & Cookies Policy from time to time to ensure that you are aware of any changes. However, we will not make material changes to how we use your previously collected Personal Information, unless you consent to the new or revised policy or generally to such uses.

COOKIES POLICY OVERVIEW

In order to provide information and ensure transparency, Town and Country San Diego established this policy so that you can learn more about:

- The origin and purpose of the information processed when you browse the Town and Country San Diego website
- Your rights with regard to cookies and other tracking technologies used by Town and Country San Diego.

External Facing Website Cookies Notices

The Services may include the following tracking technologies, and similar technologies, and which may be set and controlled by us or by our third party providers:

Cookies Banner Pop-up: Important Cookies Information – this message will appear only once to give you the best possible experience, this site uses cookies and by continuing to use this site, you agree that we can save them on your devices. Our cookies do not collect personally identifiable information. For more information, please read our updated Privacy & Cookie Policy, which also explains how to disable cookies if you wish to do so.

Cookies Notice

Town and Country San Diego website, like many others, use small files called cookies to help us customize your experience. Cookies are small text files that are stored by the browser (for example Explorer or Safari) on your computer or mobile phone. They allow websites to store things like user preferences. Cookies act as a “memory” for a website, so that the website can recognize you when you come back and therefore, respond appropriately. There are various types of cookies. For example, site performance cookies, anonymous analytics cookies, geotargeting cookies, registration cookies, advertising cookies, and third-party advertising cookies.

Town and Country San Diego may use cookies to:

- (1) Identify a data subject when they log onto our website.
- (2) Deliver content, including advertisements, relevant to your interest on Town and Country San Diego website.

(3) Keep track of items you have stored in your shopping basket.

(4) Conduct research and diagnostics to improve Town and Country Diego content, products and services.

(5) Prevent fraudulent activity.

(6) Improve security.

How can someone turn off cookies?

A data subject may turn off cookie tracking features. All modern browsers (i.e.: Internet Explorer, Firefox, Chrome, Safari, and iOS) allow individuals to change the settings in the 'options' or 'preferences' menu on your browser. In addition, third party cookies generated by advertised may be turned off by going to the Your Online Choices site. You may also visit the trade body representing these advertising platforms for additional information: Network Advertising Initiative.

Cookies Policy

In the European Union, cookies are, at present, governed by the E-Privacy Directive, Directive 2002/58/EC, as amended by Directive 2009/136/EC. The E-Privacy Directive (or EPD) is set to be replaced by the E-Privacy Regulation (or EPR) sometime in 2018, with enforcement likely to begin in 2019.

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Town and Country San Diego use of cookies

Town and Country San Diego collects information during a data subject's visit to the Town and Country San Diego website using cookies. We use these cookies for a variety of reasons, most commonly to distinguish the data subject from other users of our websites and help compile aggregate statistics about usage of our websites. We also use cookies to help us provide data subjects with a positive experience when browsing our website, to improve our content, and to personalize a data subject's visit.

Main Town and Country San Diego

Town and Country San Diego may use the following cookies. From time to time, this list may modify or be updated. We will update the list accordingly.

- 1. Analytics Cookies.** These cookies are used to estimate our audience, identify usage patterns, and speed up searches.
- 2. Session Cookies.** These cookies are used to maintain your transactions. Generally, your session cookies expire when your browser is closed. The use of the session cookies reduces the need for Two Roads Hospitality to transfer your information over the internet.
- 3. Functional Cookies.** These cookies are used to recognize repeat visitors to the site and allow the website to remember the choices you make (such as user name, language or the region you are in.) They are often used to record specific browsing information (including the way a data subject arrived at the site, the page you view, and options you select:
 - a. Country Preference Cookies.** Used to record your country preference.
 - b. Language Preference Cookies.** Used to record your preferred language.
 - c. Consent Management System Cookies.** Denotes the way the site is being viewed.
 - d. Authentication Management Cookies.** Contains your authentication ticket information.
- 4. Tracking Cookies.** From time to time, we may leverage the relationships of carefully selected and monitored partners to assist in the delivery of a quality website. Some of those partners may set cookies during your visit to track the performance of marketing campaigns and/or meet contractual obligations with Two Roads Hospitality. While these cookies do not store personal details relating to you, we do not have access or control over the cookies and similar technologies that our partners use.

How can someone turn off cookies?

A data subject may turn off cookie tracking features. All modern browsers (i.e.: Internet Explorer, Firefox, Chrome, Safari, and iOS) allow individuals to change the settings in the 'options' or 'preferences' menu on your browser. In addition, third party cookies generated by advertised may be turned off by going to the Your Online Choices site.

You may also visit the trade body representing these advertising platforms for additional information: Network Advertising Initiative.

Similar Technologies

Web Beacons: Web beacons are small graphic images or other web programming code that may be found within the Services and our communications with you. Web beacons are used to recognize certain types of information on your computer such as cookies, the time and date a

page is viewed, and a description of the page where the web beacon is placed. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to the Services, to monitor how users navigate the Services, and to count whether an e-mail we sent was opened. Web beacons may be used to collect certain Personal Information (for example, the email address associated with an email message).

Embedded Scripts: An Embedded Script is programming code that is designed to collect information about your interactions with the Services, such as the links you click on. The code is temporarily downloaded onto your computer or other device for use when you connect to the Services.

CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS

Under California Civil Code Section 1798.83, California residents who provide us with personal information in obtaining products or services for personal, family, or household use are entitled to request and obtain from us one time per calendar year information about the customer information we shared, if any, with other businesses for their own direct marketing uses. If applicable, this information would include the categories of customer information and the names and addresses of those businesses with which we shared customer information for the immediately prior calendar year.

To obtain this information from us, please send your request to the following mailing address:

Town and Country San Diego
500 Hotel Circle North,
San Diego, CA 92108
Attn: Electronic Marketing

You must put the statement "Your California Privacy Rights" in the subject field of your writing if you write to us at the designated mailing address. You must include your name, street address, city, state, and zip code. We will respond to you at your mailing address, or at our option, at your e-mail address if you provide it to us. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

European Residents – Your Personal Data Rights (GDPR)

The General Data Protection Regulation (GDPR), one of the most significant changes to data privacy law, is designed to put you in control of how your information is collected and used. We want to help you to understand these rights and exercise them as easily as possible.

For our guests who are European Union citizens, or reside within the European Economic Area, additional rights have been granted to you by the GDPR. These rights include your ability to review, correct, update, suppress, or delete personal information previously provided to Town and Country San Diego. This can be done by submitting a Data Subject Access Request, defined in the process below.

If you would like to submit a Data Subject Access Request to Town and Country Hotel, please send your request to marketing@towncountry.com, or:

Town and Country San Diego
500 Hotel Circle North
San Diego, CA 92108
Attn: Data Subject Access Request

In your Data Subject Access Request, please identify the nature of your request as it relates to any personal information which may have been previously provided (review, update, correct, suppress, or delete). For the protection of our guests, Data Subject Access Requests will only be responded to if matching records (email address or mailing address) can be located within Two Roads Hospitality's systems. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

To expedite all Data Subject Access Requests, please provide any additional details which may help to quickly identify the location(s) your data may be stored, arrival date(s), departure date(s)). Sending sensitive personal information (e.g., social security number, passport number, national identification number) is discouraged and will not expedite your Data Subject Access Request in any way, as this information is not collected, stored, or processed by Town and Country San Diego.

CONTACT US

If you have questions or comments about this Privacy & Cookies Policy, you can contact us at 619-291-7131