

THE GROVE HOSPITALITY GROUP (GHG) - PRIVACY POLICY

THE GROVE HOSPITALITY GROUP is collection of tourism-related businesses in Essex County, Ontario. The collection currently includes: THE GROVE HOTEL, THE GROVE GOODS CO., THE GROVE BIKE CO. and THE GROVE MOTEL. We describe ourselves as "customer-centric" – meaning that anything and everything for us is about the customer experience. As such, we work hard to develop a culture of trust with our guests and we take great pride in our guest's privacy and security. We do not sell or share our guest's personal information – ever! Whenever you provide personal information, we will treat that information in accordance with this policy, current Canadian Data Protection legislation and best internet practice.

By using our website, you consent to the collection, storage and processing of your personal information by us in to the manner set out in this privacy policy. Changes to this policy will be posted on our website.

DATA PROTECTION

We may collect personal information from you including, without limitation, non-public information about you that helps GHG identify you, such as first and last name, email address, home and business addresses, telephone numbers, billing information, credit card information, reservation and stay information, travel agency information, guest preferences, social media usernames, and other non-public information.

We may collect non-personal information about your use of the GHG websites such as your IP address, usage statistics, browsing history, type of computer operating system you use (e.g., Microsoft Windows or Mac OS), the type of browser you use (e.g., Firefox, Chrome, Internet Explorer), and the domain name of your internet service provider. We use the IP address(es) from which you make your reservations to help administer our website. Your IP address is also used to help identify you. We take great care to ensure this information remains confidential. We follow strict security procedures in the storage and disclosure of information which you have given us. This is to prevent unauthorized access or unlawful processing of your personal information.

From time to time, we offer packages or other services that involve third parties. If you are purchasing such a package or service, your personal information may be shared with that third party to the extent necessary to provide that service and process the purchase or request.

HOW YOU MAY PROVIDE US WITH YOUR PERSONAL INFORMATION

- By making a reservation or by using GHG services
- By signing up to receive emails, promotions, alerts, announcements or newsletters**
- By providing it to us in communications regarding service delivery such as comment cards***

- By providing the information to us by participating in a marketing initiative or contest
- By visiting our website(s)
- By applying for jobs via our website or email; and
- By communicating with GHG via the websites, email or text.

**You may unsubscribe at any time using the link provided on every e-mail message and you will no longer receive e-mail offers and promotions for the specified subscription or website, as the case may be. You may at any time in the future opt-in to receive e-mail offers. Unsubscribe instructions are also included in each of our marketing communications emails.

**This information provided to will be used solely for the purpose of recording your comments, communicating with you in respect of them, reviewing them with the subject hotel and hotel personnel, for the purposes of recognizing employees for excellence of service delivery and for developing improvements in service delivery.

WHY WE COLLECT PERSONAL INFORMATION

- To process and respond to your reservations, requests and inquiries and provide services to you.
- To understand your needs and preferences. We maintain a record of the products and services you receive from us and we may ask for additional information so that we can serve you better. For example, we may record your preference for type of room.
- To alert you to new developments, promotions, specials, special events, or products or services.
- To send announcements, promotions, and newsletters, and to provide you with personalized content in the newsletters.
- To analyze our users' demographics and interests.
- To develop, enhance, market or provide products and services. For example, we look at our guests' use of our services so that we can better understand how to improve our services.
- To manage and develop our business and operations. For example we analyze guest patterns of usage of our hotels and services to help us manage them efficiently and plan for future growth.
- To monitor and analyze information regarding your browsing and viewing preferences and to diagnose problems of the websites.
- For administration and improvement of our website and to enhance the user experience.
- To meet legal and regulatory requirements.

If we wish to use your personal information for an additional purpose, we will always ask you to agree at the point of collection. If you have already supplied us with personal information, you can change your instructions at any time.

WHEN DO WE DISCLOSE PERSONAL INFORMATION

We disclose personal information only in these limited circumstances:

- We may disclose a guest's personal information to a person who, in the reasonable judgment of GHG, is seeking the information as an agent of the guest - for example, a travel agent who is booking a reservation on behalf of the guest.
- Personal information will be shared with a third party involved in supplying the guest with the services they have purchased to the extent necessary to effect the supply and the processing of the transaction.
- Personal information may be shared with a third party retained by GHG to perform functions on its behalf such as reservations handling, data processing or storage, guest surveys or research.
- Personal information may be shared with an agent retained by GHG to evaluate a customer's credit worthiness or in order to collect a customer's account.
- Personal information may be shared with a public authority or an agent of public authority if in the reasonable judgment of TGH it appears that there is an imminent danger to life or property which could be avoided or minimized by disclosure of the information, or which disclosure is compelled by legal authority.

Any such disclosure of a guest's personal information by TGH to a third party will be made only on a confidential basis conditioned upon the information being used only for the purpose for which it has been disclosed.

PRINCIPLES

- GHG will not collect, use or disclose your personal information for any other purpose than those identified above, except with your consent.
- GHG will protect your personal information with appropriate security safeguards.
- GHG will take appropriate steps to protect the confidentiality of your personal information when dealing with third parties.
- GHG will strive to keep your personal information as accurate and up to date as is necessary for the purposes identified above.
- GHG will honour your request to access your personal information in as timely fashion as is reasonably possible.

INTERNATIONAL PRIVACY LAWS

The companies of The Grove Hospitality Group are located in Canada. Please be aware that if you are visiting our site from outside the Canada that all information you provide, including any personal data, and any information that is collected, stored or otherwise processed by GHG will necessarily result in the transfer of information across international borders to, and from Canada. Canada may not necessarily have the data protection laws as comprehensive or protective of personal data as the country in

which you reside, but our collection, storage and use of your personal data, will at all times comply with the terms of this Privacy Policy. By agreeing to this Privacy Policy and using our site, you agree to the transfer and processing of your data in the Canada in a manner consistent with the terms of this Privacy Policy.

TRADEMARK NOTICE

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If you have any questions or concerns regarding this Privacy Policy, or wish to make a request in respect of your personal information please contact our General Manager, Jennifer Flynn at jennifer@mygrovehotel.com.