

Hotel of Tomorrow®

Privacy Policy

Effective Date: August 25, 2021

Last Modified: August 25, 2021

Introduction

The Hotel of Tomorrow Project (“HOT,” “Company”, “we”, “us”, “our”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy (“the Policy”). Hotel of Tomorrow® is a registered trademark of The Gettys Group, Inc. (“TGG”), 55 W. Wacker Drive, Suite 400, Chicago IL 60601. TGG is the owner of any trademark, registered trademark, or service mark arising from the HOT project.

This Policy describes:

1. The types of information we may collect from users when you visit our website <https://hotel-of-tomorrow.com/> (“Website”) or that you may provide when you interact, register with, access, or use any HOT services (collectively, the “Services”).
2. Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect:

- On this Website;
- In email, text, and other electronic messages between you and HOT;
- Through the Website and other electronic communications sent through or in connection with the Website and Services;
- When you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this Policy.

This Policy does NOT apply to information you provide to or is collected by any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website. It is your responsibility to review the privacy practices and policies of third-party entities, including those that may link or be accessible from or on the Website, or in connection with the HOT Project.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. By accessing or using this Site, you agree to this Policy. This Policy may change from time to time (see “Changes to Our Privacy Policy”). Your continued use of the Services after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

Your use of the Services is also governed by our Terms of Use which can be found via <https://hotel-of-tomorrow.com/terms-of-use>. Please ensure you read the Terms of Use in addition to this Privacy Policy. Unless we indicate otherwise, in this Policy, defined terms will have the meanings given to them in our Terms of Use. Those definitions are incorporated herein by reference.

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including:

1. **Personal Information.** This includes, but is not limited to, information that we use to identify you, such as your name, address, email address, and telephone number.
2. **Non-Personal Information.** This includes, but is not limited to, user behavior on our Services and aggregated generic information. This is information that is about you but individually does not identify you.
3. **Usage information.** This includes, but is not limited to, information about your device including IP address, browser type and version, time zone setting, page interaction information collected through cookies and other tracking technologies.

We collect this information:

1. **Directly from you when you provide it to us.** We collect information that you provide to us, including but not limited to, information you provide by filling in forms on our Services, such as information provided at the time of registering to use our Website, posting material on the Website, or requesting further services on the Website. We may also ask for this information when you report a problem with our Services, or exercise your privacy rights and choices (see “Your Privacy Rights and Choices”).
2. **Automatically as you navigate through the Website.** Information collected automatically may include usage information as described above, and we also may use these technologies, at times in connection with third party services, to collect information about your online activities over time and across third-party websites or other online services.

For example, this Website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the Website analyze how users use the site. The information generated by the cookie about your use of the Website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this Website. By using this Website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

This Website uses “cookie” technology to obtain non-Personal Information from online visitors. We don’t extract Personal Information in this process. Rather, cookies allow us to

update and improve our Website. Even if you set your browser not to accept cookies, you can still use most of the features of the Website.

- 3. From third parties, such as our trusted business partners.** Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies, alone or in conjunction with web beacons or other tracking technologies, to collect information about you when you use our Services. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites, apps, and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information, for several reasons:

- To present our Services and its contents to you;
- To provide you with information, products, or services that you request from us;
- To set up, maintain and support our Services;
- To monitor the use of our Services in order to detect security incidents;
- For internal marketing purposes, such as marketing research;
- To notify you about changes to our Website, or any products or services we offer or provide through the Website;
- To enforce our Terms of Use;
- In any other way we may describe when you provide the information; and
- For any other purpose with your consent.

Disclosure of Your Information

We may disclose aggregated information about our users and information that does not identify any individual without restriction. We may disclose Personal Information that we collect, or you provide as described in this Privacy Policy:

- With affiliates or subsidiaries, business partners, service providers, or other third parties we use to provide you with the Services and its contents and functions. We use third party service providers that perform functions on our behalf, such as billing and payment processing.

- Your name and contact information will be shared with sponsors and other HOT project participants unless you contact us, at the contact methods provided in the “Contact Us” section below and request that your name and contact information not be shared;
- To third parties to market their products or services to you if you have not opted out of these disclosures;
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our users is among the assets transferred;
- To fulfill the purpose for which you provide it;
- For any other purpose disclosed by us when you provide the information; and
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- To enforce or apply our [Terms of Use](#);
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of HOT, our customers, or others.

Data Transfers to Other Countries/Territories

At times we may need to share your personal data with our affiliates and third-party service providers. For Data Subjects from the European Economic Area (“EEA”), we may transfer your Personal Information outside the EEA for processing pursuant to the purposes outlined above. When you provide us Personal Information, you understand and agree that it may be transferred across national boundaries and processed outside the EEA, including by trusted third parties. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Policy. If we do this, we have procedures in place to ensure your personal data receives the same protection as if it were being processed inside the EEA. Including, but not limited to, entering into contracts with our affiliates and third-party service providers which stipulate the standards they must follow at all times including the Standard Contractual Clauses.

Retention Policy

We will retain your Personal Information for as long as necessary to fulfil the purposes for which we collected it, including the purposes of satisfying any legal, accounting, or reporting requirements.

Your Privacy Rights and Choices

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies or alert you when cookies are being sent. Note that some parts of the Services may then be inaccessible or not function properly if you do so.
- **Disclosure of Your Information for Third-Party Advertising.** If you do not want us to share your Personal Information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by contacting us using the information provided in this Policy.
- **Promotional Offers from the Company.** If you do not wish to have your information used by us to promote our own or third parties' products or services, you can opt-out by contacting us using the information provided in this Policy. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.
- **Targeted Advertising.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by contacting us using the information provided in this Policy.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way.

Certain data protection laws may provide you with more privacy rights than those listed above, depending on your citizenship or residency.

A. Privacy Rights for Individuals in the European Economic Area (“EEA”)

Under the European Union's General Data Protection Regulation (“GDPR”), individuals in the EEA have additional privacy rights:

- **Right to be Informed.** Individuals have the right to transparency regarding our collection of personal data.
- **Right of Access.** Individuals have the right to know exactly what information is held about them and how it is processed.
- **Right of Rectification.** Individuals will be entitled to have personal data rectified if it is inaccurate or incomplete.
- **Right to Erasure.** Also known as 'the right to be forgotten', this refers to an individual's right to having their personal data deleted or removed without the need for a specific reason as to why they wish to discontinue.
- **Right to Restrict Processing.** An individual's right to block or suppress processing of their personal data.
- **Right to Data Portability.** This allows individuals to retain and reuse their personal data for their own purpose.
- **Right to Object.** In certain circumstances, individuals are entitled to object to their personal data being used.

- **Rights of Automated Decision Making and Profiling.** The GDPR has put in place safeguards to protect individuals against the risk that a potentially damaging decision is made without human intervention.

If you wish to exercise your rights under the GDPR, please contact us using any of the methods provided in the “Contact Us” section below. We will consider and process your request within a reasonable period of time. Please be aware that under certain circumstances, the GDPR may limit your exercise of these rights.

You may file a complaint with EU data protection authorities (“DPAs”). A list of DPAs from the European Commission may be found here: http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=50061.

B. Your California Privacy Rights

This section is our **Privacy Notice for California Residents** (“Notice”) and applies to visitors, users, and others who reside in the State of California (“consumers,” or “you/your”) and use our Services. This notice is provided to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice. This Notice does not apply to employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“Personal Information”).

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We collect different types of information from users, and we use and/or disclose this information for different business purposes. The chart below identifies the Personal Information we may collect and lists the parties with whom we may share this information and for what business purpose:

Category of Personal Information	Specific Personal Information that may be collected	Purpose of collecting the Personal Information	Categories of sources from which the personal information is collected	Is this category of Personal Information shared with third parties?	Categories of third parties with which the Personal Information may be shared	Purpose of disclosing or sharing Personal Information
Identifiers	Name, mailing address, email address, and telephone number; IP address; account information	To uniquely identify an individual in support of business activities	From you	Yes	Service Providers, HOT participants	Business processes (networking purposes)
Commercial information.	Contact information, transaction/order history	To support business transactions	Your transactions with us	Yes	Service Providers (payment processor, shipping companies)	Business processes
Internet or other similar network activity.	IP address; browser type and version; Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	To allow access to and optimize our website	From you and third-party technologies	No (but we may share aggregated statistical or demographic data with our service providers)	Service Providers	Improve Website functionality, services
Geolocation data.	Unique identifiers and your location and ZIP code	Personalization	From you and your devices	Yes	Only to Service Providers to help us deliver your products	Business processes
Inferences drawn from other Personal Information.	Your product or service preferences based on responses to our own or our third party's marketing or promotions	Personalization	From you and external data sources	In limited circumstances	Marketing partners	Marketing

How We Collect Personal Information

We obtain the above categories of Personal Information directly from you, automatically as you navigate through the site, and from third parties, such as our trusted business partners, as described above (see “Information We Collect About You and How We Collect It”).

Use of Personal Information

We do not sell your Personal Information. We may use or disclose the Personal Information we collect for one or more of the purposes listed in the chart above.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose and have disclosed in the past 12 months Personal Information to third parties for business purposes as set forth in the chart above and in this Privacy Policy. In the preceding twelve (12) months, we have not sold Personal Information.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

1. Access to Specific Information and Data Portability Rights.

You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive and confirm your verifiable consumer request (see “Exercising Your Rights” section), we will disclose to you:

- The categories of Personal Information we collected about you;
- The categories of sources for the Personal Information we collected about you;
- Our business or commercial purpose for collecting or selling that Personal Information;
- The categories of third parties with whom we share that Personal Information;
- The specific pieces of Personal Information we collected about you (also called a data portability request);
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
 - Sales, identifying the Personal Information categories that each category of recipient purchased; and
 - Disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

2. Deletion Request Rights.

You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see “Exercising Your Rights” section), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.

- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

3. Exercising Your Rights.

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 312-836-2600
- Emailing us at Hoteloftomorrow@gettys.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account.

We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Please be aware that under certain circumstances, the CCPA may limit your exercise of these rights.

4. Response Timing and Format.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Data Security

We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

Changes to Our Privacy Policy

It is our policy to post any changes we make to this Policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify you by the email address specified in your account and/or through a notice on the Website. The date the Policy was last

revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting this Policy to check for any changes.

Contact Us

To ask questions or comment about this Policy and our privacy practices, contact us at:

Hotel of Tomorrow

312-836-2600

Hoteloftomorrow@gettys.com