

# Galleria Palms Hotel Privacy Statement

The Galleria Palms Hotel values you as our guest and recognizes that privacy is important to you. We want you to be familiar with how we collect, use and disclose data.

This Privacy Statement describes the privacy practices of the Galleria Palms Hotel for data that we collect:

- through this website operated by us from which you are accessing this Privacy Statement
- through the software applications made available by us for use on or through computers and mobile devices (the “**Apps**”)
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our “**Social Media Pages**”)
- through HTML-formatted email messages that we send you that link to this Privacy Statement and through your communications with us
- when you visit or stay as a guest at one of our properties, or through other offline interactions

Collectively, we refer to the Websites, the Apps and our Social Media Pages, as the “**Online Services**” and, together with offline channels, the “**Services.**” By using the Services, you agree to the terms and conditions of this Privacy Statement.

## Collection of Personal Data

“**Personal Data**” are data that identify you as an individual or relate to an identifiable individual. At touchpoints throughout your guest journey, we collect Personal Data in accordance with law, such as:

- Name
- Gender
- Postal address
- Telephone number
- Email address
- Credit and debit card number or other payment data
- Financial information in limited circumstances
- Language preference
- Date and place of birth
- Nationality, passport, visa or other government-issued identification data
- Important dates, such as birthdays, anniversaries and special occasions

- Employer details
- Travel itinerary, tour group or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests
- Geolocation information
- Social media account ID, profile photo and other data publicly available, or data made available by linking your social media and loyalty accounts

In more limited circumstances, we also may collect:

- Data about family members and companions, such as names and ages of children
- Images and video and audio data via: security cameras located in public areas, such as hallways and lobbies, in our hotel
- Guest preferences and personalized data (“**Personal Preferences**”), such as services and amenities of which you advise us or which we learn about during your visit if you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

### **How We Collect Personal Data**

We collect Personal Data in a variety of ways:

- **Online Services.** We collect Personal Data when you make a reservation, purchase goods and services from our Websites or Apps, communicate with us, or otherwise connect with us or post to social media pages, or sign up for a newsletter or participate in a survey, contest or promotional offer.
- **Property Visits and Offline Interactions.** We collect Personal Data when you visit our properties or use on-property services. We also collect Personal Data when you attend promotional events that we host or in which we participate, or when you provide your Personal Data to facilitate an event.
- **Customer Care Centers.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
- **Strategic Business Partners.** We collect Personal Data from companies with whom we partner to provide you with goods, services or offers based upon your experiences at our properties or that we believe will be of interest to you (“**Strategic Business Partners**”). Examples of Strategic Business Partners include travel and tour partners, and travel booking platforms. Strategic Business Partners are independent from the Galleria Palms Hotel.
- **Other Sources.** We collect Personal Data from other sources, such as public databases, joint marketing partners and other third parties.

### **Collection of Other Data**

“**Other Data**” are data that generally do not reveal your specific identity or do not directly relate to an individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data. Other Data include:

- Browser and device data
- App usage data
- Data collected through cookies, pixel tags and other technologies
- Demographic data and other data provided by you
- Aggregated data

### **How We Collect Other Data**

We collect Other Data in a variety of ways:

- **Your browser or device.** We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this data to ensure that the Online Services function properly.
- **Cookies.** We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies allow us to collect data such as browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We use the data for security purposes, to facilitate navigation, to display data more effectively, to collect statistical data, to personalize your experience while using the Online Services and to recognize your computer to assist your use of the Online Services. We also gather statistical data about use of the Online Services to continually improve design and functionality understand how they are used and assist us with resolving questions. Cookies further allow us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Online Services or to send marketing emails. We also use cookies to track responses to online advertisements and marketing emails.

If you do not want data collected with cookies, you can learn more about controlling cookies at:

<http://www.allaboutcookies.org/manage-cookies/index.html> .

You can choose whether to accept cookies by changing the settings on your browser. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Online Services. For example, we will not be able to recognize your computer, and you will need to log in every time you visit. You also will not receive advertising or other offers from us that are relevant to your interests and needs.

- **Analytics.** We collect data through Google Analytics that uses cookies and technologies to collect and analyze data about use of the Services. These services collect data regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>

- **Your IP Address.** We collect your IP address, a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.  
**Aggregated Data.** We may aggregate data that we collected and this aggregated data will not personally identify you or any other user.

### **Use of Personal Data and Other Data**

We use Personal Data and Other Data to provide you with Services, to develop new offerings and to protect the Galleria Palms Hotel and our guests as detailed below. In some instances, we will request that you provide Personal Data or Other Data to us directly. If you do not provide the data that we request, or prohibit us from collecting such data, we may not be able to provide the requested Services.

We use Personal Data and Other Data for our legitimate business interests, including the following:

- **Provide the Services you request.** We use Personal Data and Other Data to provide Services you request, including:
  - To facilitate reservations, payment, send administrative information, confirmations or pre-arrival messages, to assist you with other information about the area and the hotel at which you are scheduled to visit
  - To complete your reservation and stay, for example, to process your payment, ensure that your room is available and provide you with related customer service
  - To support our electronic receipt program. When you provide an email address in making a reservation, we use that email address to send you a copy of your bill. If you make a reservation for another person using your email address, that person's bill will be emailed to you, as well. You can opt out of receiving your bill via email and instead receive a paper copy by contacting the front desk

We will use Personal Data and Other Data to manage our contractual relationship with you, because we have a legitimate interest to do so and/or to comply with a legal obligation.

- **Personalize the Services according to your Personal Preferences.** We use Personal Data and Other Data to personalize the Services and improve your experiences, when you contact our front desk, visit our hotel or use the Online Services, to:
  - Customize your experience according to your Personal Preferences
  - Present offers tailored to your Personal Preferences

We will use Personal Data and Other Data to provide personalized Services according to your Personal Preferences either with your consent or because we have a legitimate interest to do so.

- **Communicate with you about goods and services according to your Personal Preferences.** We use Personal Data and Other Data to:

- Send you marketing communications and promotional offers, as well as periodic customer satisfaction, market research or quality assurance surveys

We will use Personal Data and Other Data to communicate with you with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.

- **Activities and promotions.** We use Personal Data and Other Data to allow you to participate in contests and other promotions and to administer these activities. Some of these activities have additional rules and may contain additional information about how we use and disclose your Personal Data. We suggest that you read any such rules carefully. We use Personal Data and Other Data in this way with your consent, to manage our contractual relationship with you and/or because we have a legitimate interest to do so.
- **Business Purposes.** We use Personal Data and Other Data for data analysis, audits, security and fraud monitoring and prevention (including with the use of closed circuit television, card keys, and other security systems), developing new goods and services, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities. We use Personal Data and Other Data in this way to manage our contractual relationship with you, comply with a legal obligation and/or because we have a legitimate interest to do so.

#### **Disclosure of Personal Data and Other Data**

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we share Personal Data and Other Data with the following:

- **Service Providers.** We disclose Personal Data and Other Data to third-party service providers for the purposes described in this Privacy Statement. Examples of service providers include companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing and other services.
- **Linked Accounts and Promotional Activity.** We partner with certain third parties that allow you to enroll in their services or participate in their promotions. For example, certain companies allow you to use your loyalty program number or Online Services login to receive or register for their services. These companies include airlines and rental car providers, as well as sponsors of sweepstakes and contests. Additionally, your social media account provider allows you to connect your social media account to your Online Services account or log into your Online Services account from your social media account. When you enroll in those services, we disclose your Personal Data and Other Data to those third parties. If you do not want us to share your Personal Data or Other Data in this way, do not provide your loyalty program number to third parties, do not use your Online Services login to register for third-party promotions and do not connect your Online Services account with accounts on third-party services. Data shared in this way will be governed by the third party's privacy policy and not this Privacy Statement.

**Corporate Reorganization.** We may disclose or transfer your Personal Data and Other Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Galleria Palms Hotel business or assets (including any bankruptcy or similar proceedings).

### **Other Uses and Disclosures**

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of the Galleria Palms Hotel, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law. In some instances, we may combine Other Data with Personal Data (such as combining your name with your location). If we do, we will treat the combined data as Personal Data as long as it is combined.

### **Non Galleria Palms Entities**

This Privacy Statement does not address, and we are not responsible for the privacy, data or other practices of any entities outside of the Galleria Palms Hotel, including Strategic Business Partners or any third party operating any site or service to which the Services link, payment service, or website that is the landing page of the high-speed Internet providers at our property. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data.

In addition, we are not responsible for the data collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or the Apps or our Social Media Pages.

### **Third Party Advertisers**

We may use third-party advertising companies to serve advertisements regarding goods and services that may interest you when you access and use the Online Services, other websites or online services. To serve such advertisements, these companies place or recognize a unique cookie on your browser (including through use of pixel tags). If you would like more information about this practice, and to learn about your choices in connection with it, please visit [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp) and <http://www.aboutads.info/>. To opt out of the practice, you may download the AppChoices app at [www.aboutads.info/appchoices](http://www.aboutads.info/appchoices).

### **Security**

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the “*Contacting Us*” section, below.

### **Choices, Access and Retention**

You have choices when it comes to how we use your data and we want to ensure you have the information to make the choices that are right for you.

If you no longer want to receive marketing-related emails, you may opt out by sending an email request to: gm@gphkissimmee.com or by following the instructions in any such email you receive from us. We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from us, we may still send you important administrative messages, from which you cannot opt out.

### **Retention**

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services)
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations)

### **Sensitive Data**

- Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., social security numbers, national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions).

### **Use of Services by Minors**

- The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services.

### **Contacting Us**

- If you have any questions about this Privacy Statement, please contact us at gm@gphkissimmee.com or by mail:

- Galleria Palms Hotel  
Privacy Compliance  
3000 Maingate Lane  
Kissimmee, FL 34747  
United States of America