

CONNECTIONS HOUSING PRIVACY POLICY

Connections Housing is committed to protecting your privacy. We value your trust and take the security of your information seriously. We offer our clients superior customer service and industry leading technology. Our housing-based services including, sourcing, contracting, guest booking portals, call center services, inventory management, marketing, reporting, registration, on-site services, billing/collections, etc.

This Privacy Policy explains our data practices regarding Personal Data (as defined below) and other information that we collect in connection with:

- i. your use of the websites www.connectionshousing.com, www.connectionshousing.us, www.connectionshousingapps.com, www.connectionshousingports.com , (each a “**Website**” and, collectively, the “**Websites**”);
- ii. events you may register for, attend and/or reserve a hotel stay for

Our use of information on behalf of Clients who have contracted our services; including but not limited to: databases, reporting systems, reservation websites and systems, request forms, and more pursuant to which our Clients offer access to a website for their employees, customers and other authorized individuals (each a “**Platform**” and, collectively, the “**Platforms**”), is governed by our contract with that Client. We are not responsible for the privacy policies or privacy practices of Clients or other third parties.

By using our Websites and Platforms, you consent to policies and practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use our Websites, Platforms or submit your personal information to us.

How we collect your personal data

Connections Housing collects and uses information that, alone or in combination with other information, could be used to identify you (“**Personal Data**”) to deliver our products and services as described below (please also see the “**How We Use Information**” section below).

Personal Data That You Voluntarily Provide to Us. Connections Housing primarily collects Personal Data provided to us by individuals when they

interact with our products, services, and customer service. For example, you may voluntarily provide us with Personal Data when you are seeking housing arrangements for an event, call or email us directly, request a demonstration of our products or services, etc.

The types of Personal Data that we collect vary based on the services offered on the Websites and Platforms. This data may include your name, address, telephone number, company name, job title, e-mail address, billing details, room preferences and other information that you voluntarily submit to us most commonly in order to confirm a hotel reservation.

When you make a reservation for someone else or add a traveling companion to your reservation through our service, we will request personal information and travel preferences about that individual. You should obtain the consent of other individuals prior to providing us with their personal information and travel preferences.

Information Received from Other Sources. We also collect and use information that is provided, posted or uploaded by our clients. We do not control the content that clients provide to us or post to our platforms or websites.

We also may periodically obtain both personal and non-personal information about you from affiliated entities, business partners and other independent third-party sources. Examples of information we may obtain are primarily related to the information you provide to registration companies or membership associations to attend the events we manage housing for.

Service Data. In providing our services to Clients through the Platforms, we process on behalf of Clients information, including Personal Data, that Clients upload to, integrate with or otherwise submit to our services. Our Clients decide what data to submit (this typically includes information about their customers, prospects, members, employees, attendees, exhibitors, consultants or independent contractors, suppliers and other individuals or third parties). We only collect such information under the direction of Clients, and have no direct relationship with the individuals whose Personal Data we process.

How We Use Information

Service Data. Our use of information collected through the Platforms on behalf of our Clients is limited to the purpose of providing the service for which the Client has engaged Connections Housing and is governed by our contract with that Client and the Client's own privacy policies.

Correspondence. If you correspond with Connections Housing via e-mail, the postal service, our web forms, or other form of communication, we may retain the correspondence and the information it contains. We may use the information for business purposes, including responding to your inquiry, notifying you of event related opportunities, and other marketing purposes (please read the Marketing section below for more information on our marketing practices and how to opt out or unsubscribe).

URL and IP Address. Connections Housing's servers log users' IP addresses, we may use information about your IP address to help diagnose problems with our server, administer our Websites, analyze trends, track visitor movements, and gather information that assists us in identifying visitor preferences. We also may use your IP address to enhance our security and investigate an actual or potential security incident. For EU Data Subjects, this use of your information is necessary for our legitimate interests in understanding how the Websites and our Services are being used by you, to improve your experience on them and ensuring network and information security. For more information about what we mean by legitimate interests, and when we may process Personal Data for our legitimate interests, please see the "**EU Data Subjects**" section below.

To provide our products and services and respond to requests. We use the Personal Data we collect from you (unless otherwise restricted by law) to:

- Provide you support or other services you have requested from us. For EU Data Subjects, such use is necessary for the performance of the services requested.
- Respond directly to your information requests (including housing or other specific requests) or other inquiries. For EU Data Subjects, such use is necessary to respond to or implement your request.
- Facilitate your engagement with Connections Housing. For EU Data Subjects, such use is necessary for the performance of the services requested.

Marketing. We also use your contact information to contact you by email or by phone regarding information that we think may be of interest to you. If you do not wish to receive marketing materials, brochures, or emails from Connections Housing, you may inform us of your preference by sending a letter or calling Connections Housing at the contact information below. You may also submit a contact form electronically through the Websites and unsubscribe from our marketing communications by clicking on the “unsubscribe” link located at the bottom of our marketing e-mails.

We may send you e-mail notifications from time-to-time to update you about your reservations, remind you of approaching deadlines, and other services and offers related to your requests and/or event(s) you are attending.

Where required by the applicable law (for example, if you are an EU Data Subject), we will send you information or notifications only with your consent, which was given at the time you provided us with the Personal Data. In such case, if you do not provide us with your consent to the processing of your Personal Data for this purpose, we will not send you this information (please refer to the “**EU Data Subjects**” section below for information on your rights). For California residents, please consult the “**Your Privacy Rights**” section below for additional considerations.

Disclosure of Information

Connections Housing discloses Personal Data that we collect (described above) in accordance with the terms set forth in this section.

We share your Personal Data with third parties who provide certain services to us to assist us in meeting business operation needs and providing housing services. These parties are authorized to process your Personal Data, on our behalf and pursuant to our instructions, only as necessary to provide these services to us. We share your Personal Data with the following entities:

- **Suppliers** such as hotel, airline, car rental, and activity providers, who fulfil your travel reservations. All services provided by a third party are described as such. Therefore, we encourage you to review the privacy policies of any travel supplier whose products you purchase through this website or our services. Please note that these suppliers also may contact you as necessary to obtain additional information about you,

facilitate your travel reservation, or respond to a review you may submit.

- **Third-party vendors** who provide services or functions on our behalf, including the Cvent registration system, the Cvent Passkey reservation system, credit card processing, business analytics, customer service, marketing, and fraud prevention. We may also authorize third-party vendors to collect information on our behalf, including as necessary to operate features of our website or services. Third-party vendors have access to and may collect information only as needed to perform their functions and are not permitted to share or use the information for any other purpose.
- **Social media providers.** When you access certain Connections Housing social media features through our websites, you are sharing information with the social media provider (such as Facebook) and the information you share will be governed by their privacy policies (including that we may access such information via the social media provider).
- Providers of research and analytics services, including Google Analytics

We may also disclose Personal Data to third parties in the following circumstances: (1) if you request or authorize (when required by law, we will inform you in advance of the third parties to which we may provide your data and the purpose for doing so, and we will obtain your prior consent for such use); (2) the information is provided (a) to comply with the law (for example, to comply with a search warrant, subpoena or other legal process), (b) to enforce an agreement we have with you, (c) to protect our rights, property or safety, or the rights, property or safety of our employees or others, (d) to investigate fraud, or (e) to respond to a government request or to lawful requests by public authorities, including to meet national security or law enforcement requirements; (3) to address emergencies or acts of God; (4) to address disputes, claims, or to persons holding a legal or beneficial interest; (5) if we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, in which case your Personal Data and other information may be transferred to a successor or affiliate as part of that transaction along with other assets.

We collect, store and process the information from our Websites and Platforms in the U.S. If you are outside the U.S., then your Personal Data and other information will be transferred to the U.S. The data privacy and data

protection laws outside your country may offer less protection than the laws in your country. By using our services, the Websites, and/or Apps, or otherwise providing us with your Personal Data, you agree to the transfer of your Personal Data as described in this Privacy Policy. If you do not agree to such cross-border transfers of your Personal Data, please do not submit it through the Websites and/or Apps.

How You Can Access and Change Information

By providing your personal information to us through this website or service, you accept that we may retain your information. We may continue to process service-related information in order to fulfil our legitimate business objectives, to comply with our legal and regulatory obligations, and for historical record and analytical purposes. We employ robust technical measures to prevent unauthorized access of your information.

Connections Housing acknowledges that you have the right to access your Personal Data. Our Websites and Platforms allow you to request, access, correct, amend, or delete inaccurate data. In case you request us to remove data, we will respond within a reasonable timeframe.

Upon request, Connections Housing will provide you with information about whether we hold any of your Personal Data. You can update or correct your Personal Data or remove it from our system by making a request to us at the contact information provided below. Requests typically receive a response within thirty (30) days. If access cannot be provided within that time frame, we will provide the requesting party with an estimated date by which the information will be provided. If for some reason access is denied, we will provide an explanation of why access has been denied.

If you are an EU Data Subject, please see the “**EU Data Subject**” section below for information on your rights in relation to the Personal Data we hold about you.

EU Data Subjects

Scope. This section applies if you are an individual located in the European Union (“**EU**”) (“**EU Data Subject**”). For these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland.

Data Controller and Processor. Connections Housing acts as data processor on behalf of Clients for Personal Data that we process through the Connections Housing Platforms, as described above. Connections Housing also acts as a data controller for the Personal Data processed through third-party systems, including the Cvent Passkey reservation system.

Your Rights. Subject to applicable law, you have the following rights in relation to your Personal Data:

Right of access: If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). We may need to charge a reasonable fee.

Right to rectification: If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to erasure: You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to restrict processing: You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.

Right to data portability: Effective May 25, 2018, you have the right to obtain your Personal Data from us that you consented to give us. We will

give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

Right to object: You may ask us at any time to stop processing your Personal Data, and we will do so unless we demonstrate compelling legitimate grounds for the processing

Rights in relation to automated decision-making and profiling: You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, that affect you, unless such processing is necessary for the performance of requested services or you provide your explicit consent to such processing.

Right to withdraw consent: If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.

Right to lodge a complaint with the data protection authority: If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

You may exercise your rights by contacting us as indicated under “**Contact Us**” section below.

Legitimate Interest. “Legitimate interest” means the interests of Connections Housing in conducting and managing our organization and . For example, we have a legitimate interest in processing your Personal Data to analyze how the Websites, Apps and our products and services are being used by you, and to ensure network and information security, as described in this Privacy Policy. When we process your Personal Data for our legitimate interests, we make sure to consider and balance any potential impact on you, and your rights under data protection laws. Our legitimate interests do not automatically override your interests. We will not use your Personal Data for activities where our interests are overridden by the impact on you, unless we have your consent or those activities are otherwise required or permitted by law. You have the right to object to processing that is based on our legitimate interests. For more information on your rights, please see the “**Your Rights**” section above.

Our Security Measures to Protect Your Personal Data

We are committed to taking reasonable efforts to secure the information that you choose to provide us, and we use a variety of security technologies and procedures to help protect against unauthorized access to or alteration, disclosure, or destruction of Personal Data. We restrict access to Personal Data to our employees, contractors and service providers (described in the “**Disclosure of Information**” section above) who need to know the information in order to operate, develop, or improve our services.

Unfortunately, no transmission of Personal Data over the Internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts, Connections Housing cannot guarantee or warrant the security of any information you transmit to us, or to or from our online products or services. Connections Housing has no responsibility or liability for the security of information transmitted via the Internet. If you have questions about this Privacy Policy or the security of your Personal Data, please contact us as indicated under the “**Contact Us**” section below.

We retain your Personal Data for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements. We also retain Personal Data collected through the Platforms we process on behalf of our Clients for as long as needed to provide services to our Client and pursuant to our contract with that Client.

Tracking Technologies

Connections Housing and its partners use cookies and other technologies to analyze trends, administer the Websites, track users’ movements around the Websites, to gather demographic information about our user base as a whole and to collect information about your browsing habits in order to make advertising relevant to you and your interests, as described below.

When you first visit the Websites, you will be asked to consent to the use of cookies and similar technologies on the Websites in accordance with this Policy, and if you accept we will store cookies and similar technologies on your computer.

What Are Cookies. Cookies are pieces of data sent to your browser when you visit a website and stored on your computer's hard drive. Cookies may store user preferences and other information. For example, cookies can store your session information for easy log-in to a website or platform, or your language or user interface customization preferences or may allow websites to record your browsing activities (for example, number of page views, number of visitors, and time spent on each page).

How We Use Cookies. We use session ID cookies. A session ID cookie expires when you close your browser or "Times out" after a certain amount of inactivity.

In their use of our services, Clients' may enable various third-party integrations which may set additional cookies. These cookies are set and controlled by Clients for various purposes such as website usage tracking and analytics and enabling social media features. Connections Housing does not control the placement of such cookies. Use of these cookies is governed by Client's own privacy and cookie policies.

Other Technologies. Connections Housing may use a tracking technique that employs embedded URLs to allow use of the Websites without cookies. Embedded URLs allow limited information to follow you as you navigate the Websites, but are not associated with Personal Data and are not used beyond the session.

Your Choices. On most web browsers, you will find a "help" section on the toolbar. Please refer to this section for information on how to receive a notification when you are receiving a new cookie and how to turn cookies off. Please note that if you reject cookies or disable cookies, your use of certain features or functions on our Website or Platforms or service may be limited.

Inapplicability of Privacy Policies of Any Linked Websites or Other Third Parties

This Privacy Policy only addresses Connections Housing's use and disclosure of your Personal Data. The Websites and Apps may contain links to other websites, so please be aware that we are not responsible for the privacy practices of other websites, and we are not liable for their misuse of Personal Data. We encourage you to be aware that when you go to another website you should carefully read their privacy policy.

California Privacy Rights

In addition to the information provided in this Privacy Policy, under California's "Shine the Light" law, California residents who provide "personal information" (as defined in the statute) in obtaining products or services for personal, family, or household use are entitled to request and obtain from us, once a calendar year, information about the personal information we shared, if any, with other businesses for marketing uses. If applicable, this information would include the categories of personal information and the names and addresses of those businesses with which we shared such personal information for the immediately prior calendar year. To obtain this information, please contact us by sending a letter or calling us at the contact information below.

Children

The Websites and Apps are not intended for use by or targeted at children under 13, and we do not knowingly or intentionally collect information about children under 13.

Conditions of Use

By using the Websites, our Apps and/or our services, you agree to the terms and conditions contained in this Privacy Policy and Conditions of Use and/or any other agreement that we might have with you. If you do not agree to any of these terms and conditions, you should not use the Websites, Platforms, Apps and/or any Connections Housing benefits or services. You agree that any dispute over privacy or the terms contained in this Privacy Policy and Conditions of Use and any other agreement we have with you will be governed by the laws of Georgia. You also agree to arbitrate any such dispute in Suwanee, Georgia and to abide by any limitation on damages contained in any agreement we may have with you.

Changes to the Privacy Policy

As Connections Housing, its products, and its services change from time to time, we may update this Privacy Policy to reflect changes to our information practices. We reserve the right to amend the Privacy Policy at any time, for any reason, and may do so by posting a new version online. Your continued use of the Websites, the Platforms and/or continued provision of Personal

Data to us will be subject to the terms of the then-current Privacy Policy. If we make any material changes or if otherwise required by applicable law, we will notify you by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about this Privacy Policy or our treatment of the information you provide us, please contact us at:

Address: Connections Housing, c/o Data Protection 950 Scales Road, Building 200, Suwanee, GA, USA 30024

Phone: 1+404-842-0000

Email: dataprotect@connectionshousing.com