

## **Sanctuary on Camelback Mountain Resort & Spa - Privacy Policy**

Sanctuary on Camelback Mountain Resort & Spa is owned by Sanctuary on Camelback, Inc.d.b.a. Sanctuary on Camelback Mountain Resort & Spa, located at 5700 E. McDonald Drive, Paradise Valley, AZ (“Sanctuary on Camelback Mountain Resort & Spa”). Sanctuary on Camelback Mountain Resort & Spa is referred to in this Privacy Policy as “we”, “us”, “our”, or other similar pronouns. This Privacy Policy sets forth Sanctuary on Camelback Mountain Resort & Spa’s policies for its collection, use and disclosure of information about its customers and visitors to this Website, located at [hotelvalleyho.com](http://hotelvalleyho.com), which is published and maintained by Sanctuary on Camelback Mountain Resort & Spa (this “Website”).

This Privacy Policy may change from time to time so we suggest checking back periodically. This Privacy Policy is incorporated into, and part of, the Website ‘Terms of Use’ located at <http://www.sanctuaryoncamelback.com/content/termsofuse.html>, which governs your use of this Website in general.

You may opt in or opt out of our sharing of your personal information with third parties for marketing purposes by following the directions in the “Right to Opt In and Opt Out” section below.

This Website is intended for users who are located in the United States of America. This Privacy Policy shall be interpreted under the laws of the United States.

Advertisements displayed to you on this Website and other websites may be customized to your interests and preferences, based on your Personal Information and Website Usage Information, which may be obtained from you on this Website or from other sources. To opt out of this, visit <http://www.google.com/privacy/ads/>.

### **Purpose**

The privacy of your information is important to us. We may collect Personal Information from and about you, and we may collect certain information from your computer about you and your visits to this Website. “Personal Information” includes, for example, your name; home and/or business address; email address; telephone, wireless and/or fax number; reservation and hotel stay information; information from your driver’s license or state or federal ID card, passport image; photo; date of birth; short message service or text message address or other wireless device address; instant messaging address; credit card and other payment information; demographic information; and/or other information that may identify you as an individual or allow online or offline contact with you as an individual.

### **Right to Opt In and Opt Out**

You may have the right to “opt in” and “opt out” of certain uses of your Personal Information. For example, at the time you are requested to provide Personal Information, you may have the

opportunity to elect to, or not to: (1) receive correspondence from us, or (2) have your Personal Information shared with other entities for their marketing purposes. You may opt out of our promotional messages by clicking on an opt-out link within the message that you receive. You can also opt out of our sharing of your Personal Information with third parties for marketing purposes by emailing us at [privacypolicy@sanctuaryaz.com](mailto:privacypolicy@sanctuaryaz.com). Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions, and communications with us. Also, to stop receiving promotional messages from third parties who already have your contact information, please contact them directly.

### **Under what circumstances do we collect information on this Website?**

#### **User-Provided Information**

We collect Personal Information from users of our Website, for example, through such users' activities, transactions, and completion of online forms on our Website. Such information is also collected, for example, when users register or subscribe for accounts or features on our Website; make online purchases; enter sweepstakes and contests; complete surveys; contribute to a chat room, bulletin board, list serve, blog, wiki, or other open forum that we may make available on our Website; submit a comment or question to us using a "contact us" or similar feature on our Website; send us an email; or in any other way submit Personal Information to us via our Website. You may be able to send information about us to your friends and family members through our Website by clicking on an "Email to Friend" or similar button on our Website or in an email that we have sent you. In some of these cases (unless you simply forward our email on your own), you may provide the name and email address of your friend or family member to us. Such information will be treated in accordance with this Privacy Policy and applicable law.

### **Website Usage Information**

#### **Cookies**

We may use "cookies" to keep, and sometimes track, information about you. Cookies are small data files that are sent to your browser or related software from a Web server and stored on your computer's hard drive. Cookies track where you travel on our Website and on the Web, and what you look at and purchase. They may store the information in your shopping cart, and/or your username and/or password, and they may be used to pre-populate your contact information into online forms on our Website. A cookie may enable us to relate your use of our Website to other information about you, including your Personal Information. All of these purposes serve to improve and personalize your experience on our Website. Most Web browsers can be set to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. Additionally, if you have a Flash or other media player installed on your computer, your media player may be able to be set to reject or delete cookies known as "local shared objects". However,

refusing a cookie may, in some cases, preclude you from using, or negatively impact the display or function of, the Website or certain areas or features of the Website. By using our Website, you consent to our use of cookies as described above.

#### **Clear GIFs**

We may use “clear GIFs” (aka “Web beacons” or “pixel tags”) or similar technologies, in the Website and/or in our communications with you to enable us to know whether you have visited a Web page or received a message. A clear GIF is typically a one-pixel, transparent image (although it can be a visible image as well), located on a Web page or in an email or other type of message, which is retrieved from a remote site on the Internet enabling the verification of an individual’s viewing or receipt of a Web page or message. A clear GIF may enable us to relate your viewing or receipt of a Web page or message to other information about you, including your Personal Information.

#### **IP Address and Clickstream Data**

Our server automatically collects data about your Internet address when you visit us. This information, known as an Internet protocol address, or IP address, is a number that is automatically assigned to your computer by your Internet service provider whenever you are on the Internet. Our server may also record the Web page from which you linked to this Website (e.g., another website or a search engine); the pages you visit on this Website; the website you visit after this Website; the ads you see and/or click on; other information about the type of Web browser, computer, platform, related software, and settings you are using; any search terms you have entered on this Website or a referral site; and other Web usage activity and data logged by our Web servers. We use this information for internal system administration, to help diagnose problems with our server, and to administer our Website. Such information may also be used to gather broad demographic information, such as country of origin and Internet service provider. We may also link this information with your Personal Information. Any or all of these activities with regard to Website Usage Information may be performed on our behalf by our services providers.

#### **Under what circumstances do we collect your Personal Information at our hotel, on the phone, in paper, and otherwise offline?**

When you make a reservation with us, we naturally receive your reservation information such as your name, contact information, payment information, and guest preferences. When you make a reservation at our hotel through a third party reservation system (whether online or by phone), we receive your reservation information from that third party. When you check in, we receive the same types of information, and we also collect information from the driver’s license or state or federal identification card that you present to us. During your stay, we receive information about your guest preferences and the amenities that you use at our hotel. We also collect Personal Information from you when you make inquiries about our hotel, or request information from us, either by phone or in writing.

### **How is the Personal Information used?**

We will use your Personal Information, for example, to respond to your requests, process your orders or transactions, and to provide you with our product and service offerings. We may also use your Personal Information to maintain our internal record keeping. We may match information collected from you through different means or at different times, including both Personal Information and Website Usage Information, and use such information along with information obtained from other sources, including third parties. In addition, we may send you notices (for example, in the form of emails, mailings, and the like), and otherwise correspond with you, about products, services, companies, and events, sponsored by us and others, that we think might interest you. You may opt out of receiving such notices from us by following the instructions in the Right to Opt In and Opt Out section above. We may analyze user behavior as a measure of interest in, and use of, our Website and emails, both on an individual basis and in the aggregate.

### **Do we share Personal Information and Website Usage information with others?**

#### **Public Forums**

When you contribute to a public area or feature of our Website, such as a chat room, bulletin board, list serve, blog, wiki, or other communication or community tool or area, the information that you submit or post will be made available to the general public. For this reason, we recommend that you do not submit any sensitive information, including your full name, home address, phone number, other information that would enable other users to locate you, or financial information on these areas of our Website. Instead, make up a username that does not disclose your personal identity.

#### **Third-Party Offers**

We may provide visitors an opportunity to receive offers from other entities that have services, products, and offers that we think might be of interest to you. Unless you elect not to receive such offers by following the instructions in the "Right to Opt In and Opt Out" section above, we may from time to time provide your Personal Information to these entities so that they may send you these offers. If you change your mind and no longer want us to share your Personal Information with these types of third parties, follow the instructions to opt out in the "Right to Opt In and Opt Out" section above.

#### **Co-Sponsored Contests, Sweepstakes, and Offerings**

Some of our contests, sweepstakes, and other offerings may be co-sponsored by another company. In those situations, the information we obtain from you in connection with such contest, sweepstake, or offering may be shared with our co-sponsor, unless you instruct us not to by following the instructions in the "Right to Opt In and Opt Out" section above. In those situations, our co-sponsors will have the right to use your information for their own purposes, in accordance with their own policies. We are not responsible for how our co-sponsors may use your information.

**Service Providers**

We may use third-party partners to help operate our Website and deliver our products and services, and may share your information with our service providers and other third parties that provide products or services for or through this Website or for our business (such as website or database hosting companies, address list hosting companies, email service providers, analytics companies, distribution companies, fulfillment companies, and other similar service providers that use such information on our behalf).

**Website Usage and other Non-Personally Identifiable Information**

We may disclose Website Usage Information and other non-personally identifiable information regarding our users and user behavior as a measure of interest in, and use of, our Website, our hotel, and emails to third parties, including, for example, aggregate data, such as overall patterns or demographic reports that do not describe or identify any individual user.

**Our Development and Management Company**

We share Personal Information and Website Usage Information with our development and management company, Westroc Hotels & Resorts. Westroc Hotels & Resorts uses such information in accordance with its own policies.

**Legal Disclosures**

We may disclose user information to government authorities, and to other third parties when compelled to do so by government authorities, at our discretion, or otherwise as required or permitted by law, including but not limited to in response to court orders and subpoenas. We also may disclose user information when we have reason to believe that someone is causing injury to or interference with our rights or property, other users of the Website, or anyone else that could be harmed by such activities.

**Business Transfer**

In the event that Sanctuary on Camelback Mountain Resort & Spa or Westroc Hotels & Resorts, or substantially all of its assets, are acquired by one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation or liquidation, Personal Information may be one of the transferred assets.

**Security**

While we endeavor to protect the security and integrity of the sensitive Personal Information we have about you, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that any information, during transmission through the Internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.

If you contact us by email, a “contact us” form, or similar feature on our Website, you should be aware that your transmission might not be secure. A third party could view information you send by these methods in transit.

You may be able to create an account on our Website with a username and password. If so, you are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any access to or use of the Website by you or any person or entity using your password, whether or not such access or use has been authorized by or on behalf of you, and whether or not such person or entity is your employee or agent. Please notify us of any unauthorized use of your password or account or any other breach of security.

We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your email address, we may notify you by email. You consent to our use of email as a means of such notification. If you prefer for us to use the United States Postal Service to notify you in this situation, please email us at [privacypolicy@sanctuaryaz.com](mailto:privacypolicy@sanctuaryaz.com).

#### **Consent to Processing**

By providing Personal Information to this Website, you consent to the collection, maintenance, processing, and transfer of such information in and to the United States and other countries and territories, pursuant to the laws of the United States, which may provide lesser privacy protections than the laws of other countries.

#### **“Linked-To” Websites**

When you are on our Website you may have the opportunity to visit, or link to, other websites. These sites may collect Personal Information about you. We do not control sites that are operated by these entities and are not responsible for the information practices of these sites. This Privacy Policy does not address the information practices of other websites. The Privacy Policies of websites operated by other companies are located on those sites.

#### **Changes to this Privacy Policy**

We reserve the right to change this Privacy Policy from time to time, and such changes will be effective immediately upon posting to this Website. Under certain circumstances (for example, in connection with certain material changes), we may also elect to notify you of changes or updates to our Privacy Policy, or to request your consent for such changes, by additional means, such as posting a notice on the front page of our Website or sending you an email.

**Contact Us**

If you have any questions or comments regarding our privacy practices, you are welcome to contact us at [privacypolicy@sanctuaryaz.com](mailto:privacypolicy@sanctuaryaz.com).