

IHG OWNERS

A S S O C I A T I O N

IHGOA Website Privacy Policy August 31, 2018

IHG Owners Association (IHGOA, the “Association” or “We”) is a hospitality industry membership organization of IHG® brand hotel owners and principal correspondents with its primary office at Three Ravinia Drive, Suite 100 Atlanta, GA 30346 USA. IHGOA is affiliated with IHG. More information about IHG is available at www.IHG.com. This information may be updated from time-to-time at IHG’s sole discretion.

IHGOA provides services to its members including:

- Advocacy for IHG hoteliers;
- Educational opportunities, including webinars, information guides and members-only access to tools and resources;
- Brand information, best practices and member news through *OWNER* magazine, e-newsletters, hospitality industry news and legislative alerts;
- Volunteer committees, councils and task forces which provide advice and counsel to IHG on brand standards and business programs;
- Regional members-only meetings and events;
- Global Text Messaging Communications Program to share members’ opinions with one another and gain insight into what other owners and operators are saying about IHG initiatives, as well as their individual businesses;
- Specialty groups, such as the Emerging Leaders Network, which encourages and cultivates critical skill development for leaders and executives under the age of 40;
- Member benefit programs such as IHGOA’s Free Night Program, a complimentary Platinum upgrade in the IHG Rewards Club; discounts and offers from IHGOA’s Allied Member Program; and
- Fundraising opportunities, such as to support Give Kids the World, IHGOA’s selected charity.

This website is owned by the IHG Owners Association. IHGOA is committed to being transparent about your privacy and security on its websites, www.owners.org and <http://connect.owners.org>. We want you to understand how we collect, use, and share user information and we have created this Privacy Policy to serve as a guide.

Topics

- What Personal Information we collect about you
- How we use Personal Information about you
- How we share Personal Information about you
- Email Communications
- Internet cookies
- Your California privacy rights
- Other websites and social media
- LinkedIn and job-search Websites
- Internet blogs /forums
- Children

IHG OWNERS

A S S O C I A T I O N

- Security of your Personal Information
- Notice to Persons in the EU/EEA or Switzerland
- EU/EEA Definitions
- EU/EEA/Swiss Data Protection Principles
- EU/EEA/Swiss Rights regarding Personal Information including under the GDPR
- How Long IHGOA Keeps EU/EEA/Swiss Personal Information
- Transferring your Personal Information to other countries
- EU-US and Swiss-US Privacy Shield
- Applicable law
- Changes to this Privacy Policy
- How to contact us

What Personal Information We Collect About You

We collect information about you when you apply for and renew your IHGOA membership; pay your member dues; register for conferences, meetings and events; participate in committees, councils, task forces or specialty groups; participate in member benefits programs; place an order for products or services; visit or log in to our website and/or online community forum, and/or contact us through our website contact page.

We also collect information about you when you participate in IHGOA's Global Text Messaging Communications Program; and when you voluntarily complete member surveys, provide feedback to us, or submit a review, testimonial, or blog.

The type of information we collect includes your name, mailing address, phone numbers (including mobile phone numbers), email addresses, payment details, date of birth, and signature. We may also ask for information related to your employment for membership purposes.

We may also automatically receive information from you when you visit this website, including your Internet Protocol (IP) address, Device ID, cookie information, browser information and other technology tags like the date and time you visited this website and which website you visited just before this one. This type of automatic information collection is standard practice on the internet and is collected by "cookies". More information about Internet cookies and how to opt-out is below. We also collect information about you when you visit, access, or use our pages on social media websites such as Facebook, Twitter and LinkedIn.

How We Use Personal Information About You

We take reasonable steps to ensure that the Personal Information we collect from you is relevant and reliable for our processing and use, accurate, complete, and current as necessary for our uses. We will not process your Personal Information in a way that is inconsistent with the purposes for which we have collected it or for which you have given us your consent.

We collect and use information about you necessary to perform a contract with you including:

- Managing your membership and account;
- Processing your order;

IHG OWNERS

ASSOCIATION

- Communicating with you;
- Responding to your questions, comments, or postings;
- Providing you customer service and technical support;
- If you consent, to email you about other products and services you may be interested in; and
- If you consent, to email you about other products and services you may be interested in from our affiliate IHG and IHGOA's Allied Members.

We use your information collected from our website and for our legitimate business interests in:

- Protecting the safety, security and legal rights of our association, website, members, customers, affiliates, business partners, and service providers;
- Improving our products and services;
- Conducting research and analysis and
- If you consent, tracking your use on our websites and personalizing your visits to our website for marketing purposes.

For membership and Association purposes, we may use your Personal Information to analyze data, to develop new services based on user trends and to enhance and improve our website by providing more useful features based on user patterns.

How We Share Personal Information About You

Any time sharing of Personal Information may be necessary, we will carefully consider all options and will strive to share as little as possible.

We share your Personal Information:

- If you consent, with our affiliate IHG and/or our Allied Members so that they can offer you their products and services;
- With service providers, consultants and contractors who help us with: development, maintenance and support of our website; marketing research and analysis; communications and customer service. We do not authorize these service providers to use or disclose your Personal Information except as necessary to perform tasks we have asked them to do for us or to comply with legal requirements;
- To comply with laws or to cooperate with a legal investigation or a request from a government authority;
- To protect our legal rights and legitimate interests, and those of our members, business partners, and service providers
- To protect the legal rights, safety, and security of users of our website;
- To prevent fraud;
- As a business asset in connection with a sale, merger, or other transaction of IHGOA;
- In non-personally identifiable form; or
- With your consent.

We will not share your information for marketing purposes with companies outside of IHGOA, IHG and IHGOA's Allied Members.

IHG OWNERS

A S S O C I A T I O N

In processing your membership or other order, we may send information about you to credit reference agencies and fraud prevention agencies and use information from those agencies.

Email Communications

IHGOA communicates with members, people interested in the Association, and its affiliates and business partners through email. IHGOA protects its email address lists, data and other Personal Information used in email correspondence with the same reasonable practices it uses to protect Personal Information collected through this website. If you receive an email from IHGOA you are someone who has either:

1. Expressly shared your email address to receive information about products, services or membership (“opt-in”) or
2. Provided your email address to us through an existing relationship, including but not limited to membership, advertising, advocacy, and volunteer programs.

Our emails are sent with an automatic unsubscribe option if you would like to stop receiving emails from us. However, if you have an account with us, we retain the right to contact you via email regarding the status of your account.

When we send emails, IHGOA sometimes tracks who has opened or clicked through the email contents. We track this information to measure interest in a subject, monitor an email campaign’s performance or better understand user trends so we can improve your IHGOA experience.

We do not share, sell, or disclose your Personal Information to Third Parties for promotional use without your prior consent.

We would like to send you information about products and services of ours and our affiliates and business partners that you may be interested in. If you have consented to receive marketing messages from us, our affiliates or business partners, you may opt-out at any time by clicking on the unsubscribe button on the bottom of our email.

If you no longer want to be contacted by **us** about our other products and services, please visit the IHGOA Communication Preferences webpage [here](#).

If you no longer want to be contacted by **our affiliates or business partners** about their products and services, please visit the IHGOA Communication Preferences webpage [here](#).

Because we plan our communications in advance, it may take several weeks for your opt-out request to take effect. If you continue to receive marketing messages from us or our affiliates or business partners after you opt-out, please let us know so that we can investigate the situation.

IHG OWNERS

ASSOCIATION

Internet Cookies

Cookies are text files placed on your computer by websites to collect standard log information and visitor behavior information. Our service providers and we use cookies on our website. Information from cookies is used to track your use on our websites and to make statistical reports on activity on our website. For more information about cookies visit www.aboutcookies.org.

For more information about the specific cookies we use when you visit our website, their purpose, information they collect when you visit our website and third-party sites, how to opt out, and a link to a website where you can withdraw consent to being tracked by third parties, please visit our More Cookie Information page [here](#).

You can set your browser to reject cookies, and www.aboutcookies.org tells you how to remove cookies from your browser. In a few cases, some of our website features may not work when your browser does not accept cookies.

We use Google Analytics and Bing Analytics, to help us measure visitors and trends for our websites. For more information about how Google collects, uses and shares your information, please visit the Google Privacy Policy-Partners website at <https://policies.google.com/technologies/partner-sites>. For more information about how Bing collects, uses and shares your information, please visit the Microsoft Privacy Statement website at <https://privacy.microsoft.com/en-us/privacystatement/>.

Opt-out of Google Analytics

To prevent your data from being used by Google Analytics, [click here](#) for instructions.

Some of our web pages use “Frames” to serve content to/from our business partners while preserving the look and feel of our website. A Frame is a part of a web page or browser window which displays content independent of its container, with the ability to load content independently. Please be aware that you are providing your Personal Information to these Third Parties and not IHGOA.

If you want to opt-out of targeted interest-based advertising, please visit Network Advertising Initiative (NAI) Consumer Opt-Out website at https://www.networkadvertising.org/managing/opt_out.asp, or if you are located in the European Union/European Economic Area, please visit European Interactive Digital Advertising Alliance (EDAA) Your Online Choices website at <https://www.youronlinechoices.eu/>. Please note you will continue to receive generic ads.

Your California Privacy Rights

If you live in California, California law allows you to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed your Personal Information (if any, and as defined under California law) for the third party’s direct marketing purposes in the prior calendar year, as well as the type of your Personal Information disclosed to those parties. If you live in California and would like to request this information, please send your request in an email to privacy@ihgowners.org.

IHG OWNERS

A S S O C I A T I O N

Other Websites and Social Media

Our website contains links to other websites. This Privacy Policy only applies to IHGOA's website, so when you visit or use other websites you should read their own privacy policies.

Our website and communications may contain links to social media websites such as Facebook, LinkedIn, Twitter, etc., and social media features, such as the Facebook "Like" and "Share" buttons. Social media sites and features may collect and use Personal Information from you. We have no control over and are not responsible for the privacy practices, policies, or content of any Social Media websites or features, even if you link to them from, or use them on, IHGOA's website. Please review Facebook's privacy policy at <https://www.facebook.com/about/privacy/update>. Please review LinkedIn's privacy policy at <https://www.linkedin.com/legal/privacy-policy>. Please review Twitter's privacy policy at <https://twitter.com/privacy>.

We are not responsible for information, content, and/or the privacy practices of Third Parties operating websites that may link to this website. The inclusion of a link on this website does not imply endorsement of the linked site by us or by our affiliates or business partners.

LinkedIn and Job-Search Websites

You can apply for a job at IHGOA using LinkedIn and other job-search websites. Those websites will verify your identity, give you the option to share Personal Information (such as your name and email address) with us, and auto-fill our job application signup form.

Internet Blogs/Forums

Our website offers public blogs and/or one or more community forums. Any information, including Personal Information, you share or post on those blogs or in those forums may be public. We are not responsible for the results of your blog or forum postings.

Children

The website is not intended for use by children under the age of 16, and there is no assumption that children will be using these website services at any time. If we become aware that a child has submitted Personal Information on the website, we will immediately delete the information from our records.

Security of Your Personal Information

We use reasonable data security techniques to protect your information from unauthorized access, use and/or disclosure. While IHG Owners Association is diligent about user security on our website, no data security technique is 100% secure, so IHGOA cannot guarantee that your Personal Information will never be accessed used or disclosed. If you have questions about our internet, data, or information policies, please contact us.

"Phishing" is a scam designed to steal your Personal Information. If you receive an e-mail that looks like it is from us asking you for Personal Information about you, please contact us at privacy@ihgowners.org.

IHG OWNERS

A S S O C I A T I O N

Notice to Persons in the EU/EEA or Switzerland

If you are located in the European Union (EU), European Economic Area (EEA) or Switzerland, please see also the EU-US and Swiss-US Privacy Shield section below about how to make complaints regarding data collected in the EU and transferred to the U.S. under the Privacy Shield Frameworks.

If IHG or an IHGOA Allied Member is using IHGOA's products or services to process your Personal Information, you may contact IHG or the applicable IHGOA Allied Member to object, restrict, access, correct, delete or transfer (portability) your Personal Information. If you need help finding contact information for an IHG or an IHGOA Allied Member's privacy office, please contact us at:

IHGOA Privacy Officer
Three Ravinia Drive, Suite 100 Atlanta, GA 30346 USA
1.770.604.5555
privacy@ihgowners.org

EU/EEA Definitions

- **'Consent' or 'Agree'** means your freely given, specific, informed, and unambiguous expression of your wishes through a statement or other clear affirmative action such as checking a box which indicates your agreement to our processing of personal data relating to you.
- **'Personal Data' or 'Personal Information'** means any information relating to you from which you can be identified, directly or indirectly, including your name, identification number, location, online identifier such as your IP address or device ID, or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural, or social identity. It includes any personal information whether it is held in paper, electronic or any other format.
- **'Processing' or 'process'** means any operation or set of operations performed on personal data or on sets of personal data, including by automatic methods, such as collecting, recording, organizing, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing, transmitting, sharing or otherwise making available, aligning or combining, restricting, erasing or destroying it.
- **'Third Party'** means our business partners and service providers who we authorize to process your personal data to help us with: development, maintenance, and support of our website, marketing research and analysis, communications, and customer service. It also includes government bodies and public agencies and authorities.

EU/EEA/Swiss Data Protection Principles

IHGOA Processes EU/EEA and Swiss Personal Information/Data in accordance with the following data protection principles:

IHG OWNERS

A S S O C I A T I O N

- IHGOA Processes Personal Data lawfully, fairly and in a transparent manner consistent with applicable law.
- IHGOA collects Personal Data only for specified, explicit and legitimate purposes consistent with applicable law.
- IHGOA Processes Personal Data only where it is adequate, relevant and limited to what is necessary for the purposes of Processing consistent with applicable law.
- IHGOA keeps accurate Personal Data and takes all reasonable steps to ensure that inaccurate Personal Data is rectified or deleted without delay consistent applicable law.
- IHGOA keeps Personal Data only for the period necessary for Processing consistent applicable law.
- IHGOA adopts appropriate measures to make sure that Personal Data is secure, and protected against unauthorized or unlawful processing, and accidental loss, destruction or damage.

IHGOA tells individuals located in the EU/EEA and Switzerland the reasons for Processing their Personal Data, how it uses their Personal Data and the legal basis for Processing by providing them this Privacy Policy/Notice and related notices, disclosures, and consent forms. IHGOA will not process Personal Data for other reasons.

EU/EEA/Swiss Rights Regarding Personal Information including under the GDPR

You have rights regarding the Personal Information we have about you.

You may object to, or restrict, our collection, use, sharing, transfer and/or storage of your Personal Information. You may also request a copy of the information that we have about you. You may also ask us to transfer (portability), correct or remove information you think is incorrect.

If you have a registered account in our system, you may object, restrict, access, correct, or request transfer (portability), deletion or a copy of some, or all, of your Personal Information by logging in to your account or by contacting us at privacy@ihgowners.org.

If you do not have a registered account in our system and you would like to object, restrict, access, correct, delete, or request transfer (portability) or a copy of some, or all, of your Personal Information, please email or write or call us at the following address:

IHGOA Privacy Officer
Three Ravinia Drive, Suite 100 Atlanta, GA 30346 USA
1.770.604.5555

IHGOA may need to ask for proof of identification before a request can be processed and we will inform the requestor if IHGOA needs to verify his/her identity and the documents IHGOA requires.

IHGOA will normally respond to a request within a period of one month from the date a request is received. In some cases, such as where IHGOA Processes large amounts of the individual's data, it may respond within three months of the date the request is received. IHGOA will write to the requestor within one month of receiving the original request to tell him/her if more time is needed to complete the response to their request.

IHG OWNERS

A S S O C I A T I O N

If you are located in the European Union/European Economic Area or Switzerland and want to opt-out of targeted interest-based advertising, please visit the European Interactive Digital Advertising Alliance (EDAA) Your Online Choices website at <https://www.youronlinechoices.eu/>. Please note you will continue to receive generic ads.

If you are in the EU/EEA or Switzerland, you may also make a privacy and/or data use complaint about IHGOA to the UK Information Commissioner's Office (ICO) at <http://ico.org.uk/concerns/> or by calling the UK ICO helpline at +44-0303-123-1113. Individuals in Switzerland can also make a complaint to the Swiss Federal Data Protection and Information Commissioner here <http://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/task.html>. You can also make a complaint to the Data Protection Authority in the EU/EEA Member State where you live or work by visiting the Office of the Data Protection Commissioner list of Data Protection Authorities here http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

How Long IHGOA Keeps EU/EEA/Swiss Personal Information

IHGOA will keep your Personal Information for as long as necessary for us to provide you services.

We will also keep and use your Personal Information to comply with laws including tax laws, employment laws, social security, and other applicable laws.

We will also keep your Personal Information as necessary for backup, archiving, audit, preventing fraud, resolving disputes, and troubleshooting problems.

Transferring EU/EEA/Swiss Personal Information to Other Countries

Our website is provided from within the United States and is subject to state and federal laws of the United States. If you are located outside the United States, your Personal Information is being transferred to, stored, used, and shared in the United States.

Personal Data is also transferred by IHGOA to countries outside the EU/EEA or Switzerland for IHGOA's legitimate interests in processing Personal Data where necessary to perform its obligations to its members and to exercise its rights and fulfill its duties under law. IHGOA transfers Personal Data outside the EU/EEA and Switzerland to the U.S. on the basis of **Privacy Shield Frameworks**.

EU-US and Swiss-US Privacy Shield

IHGOA complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use and retention of your Personal Information from the European Union member countries (including Iceland, Liechtenstein, and Norway) and Switzerland transferred to the United States pursuant to Privacy Shield. IHGOA has certified that it adheres to the Privacy Shield Principles with respect to such personal information. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, visit <https://www.privacyshield.gov/>.

IHG OWNERS

A S S O C I A T I O N

With respect to personal information received or transferred pursuant to the Privacy Shield Frameworks, IHGOA is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the Privacy Shield Frameworks, EU and Swiss individuals have the right to obtain IHGOA's confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to privacy@ihgowners.org. If requested to remove data, we will respond within a reasonable timeframe.

IHGOA will provide an individual opt-out or opt-in choice before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to privacy@ihgowners.org.

IHGOA's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, IHGOA remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless IHGOA proves that it is not responsible for the event giving rise to the damage.

As stipulated in the Privacy Shield Frameworks IHGOA is obliged to inform EU and Swiss individuals that we may be forced to release personal data in response to lawful requests from public authorities including to meet national security and law enforcement requirements.

In compliance with the Privacy Shield Principles, IHGOA commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact IHGOA:

- by email at privacy@ihgowners.org
- write to us at:
IHG Owners Association
Three Ravinia Drive, Suite 100
Atlanta, GA 30346 USA
- or call us at +1.770.604.5555

IHGOA has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers for more information and to file a complaint. This service is provided free of charge to you.

IHG OWNERS

A S S O C I A T I O N

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

Applicable Law

This website is created and controlled by IHG Owners Association in the State of Georgia, USA. As such, the laws of the State of Georgia will govern these disclaimers, terms and conditions, without giving effect to any principles of conflicts of laws. We reserve the right to make changes to our website, this Privacy Policy and these disclaimers, terms, and conditions at any time

Changes to this Privacy Policy

We keep this Privacy Policy under regular review and if we have your email address, we will email you when we make changes in the future. We will also place any updates on our websites. This privacy policy was last updated on **August 31, 2018**.

How to Contact Us

Please contact us if you have any questions about our privacy policy or information we have about you.

IHGOA Privacy Officer
Three Ravinia Drive, Suite 100 Atlanta, GA 30346 USA
1.770.604.5555
privacy@ihgowners.org