

DRAKE HOTEL PROPERTIES (DHP) - PRIVACY POLICY

The Drake is a community of creative culture seekers who trust one another and who trust us as a company. We take our guest's privacy and security very seriously. We do not sell or share our guest's personal information. Whenever you provide personal information, we will treat that information in accordance with this policy, current Canadian Data Protection legislation and Internet best practice.

By using our website, you consent to the collection, storage and processing of your personal information by us in the manner set out in this privacy policy. Changes to this policy will be posted on our website.

DATA PROTECTION

We may collect personal information from you including, without limitation, non-public information about you that helps DHP identify you, such as first and last name, email address, home and business addresses, telephone numbers, billing information, credit card information, reservation and stay information, travel agency information, guest preferences, social media usernames, and other non-public information.

We may collect non-personal information about your use of the DHP websites such as your IP address, usage statistics, browsing history, type of computer operating system you use (e.g., Microsoft Windows or Mac OS), the type of browser you use (e.g., Firefox, Chrome, Internet Explorer), and the domain name of your internet service provider. We use the IP address(es) from which you make your reservations to help administer our website. Your IP address is also used to help identify you. We take great care to ensure this information remains confidential. We follow strict security procedures in the storage and disclosure of information which you have given us. This is to prevent unauthorized access or unlawful processing of your personal information.

From time to time, we offer packages or other services that involve third parties. If you are partaking of such a package or service, your personal information will be shared with that third party to the extent necessary to provide that service and process the purchase or request.

HOW YOU MAY PROVIDE US WITH YOUR PERSONAL INFORMATION

- By making a reservation or by using DHP services
- By registering with DHP's loyalty program, 'With Drake'*
- By signing up to receive emails, promotions, alerts, announcements or newsletters**
- By providing it to us in communications regarding service delivery such as comment cards***
- By providing the information to us by participating in a marketing initiative or contest
- By visiting our website(s)
- By applying for jobs via our website or email; and
- By communicating with DHP via the websites, email or fax.

*As a regular hotel guest of DHP you have the opportunity to belong to its loyalty program, 'With Drake'. 'With Drake' is designed to deliver a higher level of personalization and service, additional personal information will be required. Membership is voluntary.

**You may unsubscribe at any time using the link provided on every e-mail message and you will no longer receive e-mail offers and promotions for the specified subscription or website, as the case may be. You may at any time in the future opt-in to receive e-mail offers. Unsubscribe instructions are also included in each of our marketing communications emails.

***This information provided to will be used solely for the purpose of recording your comments, communicating with you in respect of them, reviewing them with the subject hotel and hotel personnel, for the purposes of recognizing employees for excellence of service delivery and for developing improvements in service delivery.

WHY WE COLLECT PERSONAL INFORMATION

- To process and respond to your reservations, requests and inquiries and provide services to you.
- To understand your needs and preferences. We maintain a record of the products and services you receive from us and we may ask for additional information so that we can serve you better. For example, we may record your preference for type of room.
- To alert you to new developments, promotions, specials, special events, or products or services.
- To send announcements, promotions, and newsletters, and to provide you with personalized content in the newsletters.
- To analyze our users' demographics and interests.
- To develop, enhance, market or provide products and services. For example, we look at our guests' use of our services so that we can better understand how to improve our services.
- To manage and develop our business and operations. For example we analyze guest patterns of usage of our hotels and services to help us manage them efficiently and plan for future growth.
- To monitor and analyze information regarding your browsing and viewing preferences and to diagnose problems of the websites.
- For administration and improvement of the Websites and to enhance the user experience.
- To meet legal and regulatory requirements.

If we wish to use your personal information for an additional purpose, we will always ask you to agree at the point of collection. If you have already supplied us with personal information, you can change your instructions at any time.

WHEN DO WE DISCLOSE PERSONAL INFORMATION

We disclose personal information only in these limited circumstances:

- We may disclose a guest's personal information to a person who, in the reasonable judgment of DHP, is seeking the information as an agent of the guest - for example, a travel agent who is booking a reservation on behalf of the guest.
- Personal information will be shared with the hotel for which your reservation has been made so that they may provide the services you have reserved.
- Personal information may be shared with other hotels within DHP so that they may better provide services to you in the event you wish to travel to that hotel in the future.
- Personal information will be shared with a third party involved in supplying the guest with the services they have purchased to the extent necessary to effect the supply and the processing of the transaction.
- Personal information may be shared with a third party retained by DHP to perform functions on its behalf such as reservations handling, data processing or storage, guest surveys or research.
- Personal information may be shared with an agent retained by DHP to evaluate a customer's credit worthiness or in order to collect a customer's account.
- Personal information may be shared with a public authority or an agent of public authority if in the reasonable judgment of DHP it appears that there is an imminent danger to life or property which could be avoided or minimized by disclosure of the information, or which disclosure is compelled by legal authority.

Any such disclosure of a guest's personal information by DHP to a third party will be made only on a confidential basis conditioned upon the information being used only for the purpose for which it has been disclosed.

PRINCIPLES

- DHP will not collect, use or disclose your personal information for any other purpose than those identified above, except with your consent.
- DHP will protect your personal information with appropriate security safeguards.
- DHP will take appropriate steps to protect the confidentiality of your personal information when dealing with third parties.
- DHP will strive to keep your personal information as accurate and up to date as is necessary for the purposes identified above.
- DHP will honour your request to access your personal information in as timely fashion as is reasonably possible.

INTERNATIONAL PRIVACY LAWS

The Drake is located in Canada. Please be aware that if you are visiting our site from outside the Canada that all information you provide, including any personal data, and any information that is collected, stored or otherwise processed by The Drake will necessarily result in the transfer of information across international borders to, and from Canada. Canada may not necessarily have the data protection laws as comprehensive or protective of personal data as the country in which you reside, but our collection, storage and use of your personal data, will at all times comply with the terms of this Privacy Policy. By agreeing to this Privacy Policy and using our site, you agree to the transfer and processing of your data in the Canada in a manner consistent with the terms of this Privacy Policy.

TRADEMARK NOTICE

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privacyofficer@thedrakehotel.ca