

## Privacy Notice

*Effective: March 22, 2024*

Stay Inns Hotels (“**Stay Inns**,” “**we**,” “**us**,” “**our**”) provides this Privacy Notice (“**Privacy Notice**”) describing important information about how we collect, use, and disclose your personal data in the following circumstances:

- Through the website we own and control that link to this Privacy Notice (the “**Online Services**”),
- Through the social media pages we control, emails that we send, and other direct marketing activities (“**Marketing Activities**”),
- Through our interaction with business contacts in the context of their relationship with us (“**Business Contact Activities**”),
- When you visit one of the properties we own, operate, franchise, or license and through other in-person interactions with you (“**Offline Activities**”).

When we use the term “**Services**” in this Privacy Notice, we collectively refer to the Online Services, Marketing Activities and Offline Activities.

When we use the term “**Guests**” in this Privacy Notice, we mean the users of and visitors to the Services. Employees, contractors, and job applicants who are California residents receive a supplemental privacy notice that applies to their relationship with Stay Inns in the context of their employment, engagement, or job application. In the event of any conflict with this Privacy Notice, the terms of the supplementary employee notice will control.

When we use the term “**personal data**” we mean any information that identifies an individual person or reasonably relates to an identifiable individual.

### What Personal Data We Collect

1. **Personal data** – We collect personal data about our Guests so that we can provide an experience that is responsive to your needs and to enhance our offerings to you and our other customers, including:

- Name
- Postal address
- Email addresses
- Telephone numbers
- IP Address and other online identifiers
- Credit card information and other payment data
- Financial information, in limited circumstances
- Account information, such as username and password
- Gender or gender expression

- Health information, from Guests with particular health concerns that they have shared with us
- Lifestyle information, such as room preferences and other information necessary to fulfill special requests (e.g., medical conditions that require room accommodations)
- Date of birth
- Nationality, passport, visa, or other government-issued identification information
- Visual information captured through CCTV cameras at our facilities
- Job title and employment affiliations
- Employer details
- Travel itinerary, tour group, or activity data
- Guest preferences and personalized data, such as your communications and language preferences, travel habits and preferences, food and beverage preferences, interests, activities, hobbies, prior stays or interactions, goods and services purchased, special service and amenity requests, and important dates (such as birthdays, anniversaries and special occasions)
- Social media account ID, profile photo, and other data publicly available, or data made available by linking your social media
- Information about family members and companions, such as names and ages of children
- Images, video, and audio data via security cameras and security personnel body cameras
- Geolocation information

2. **Other Data** – We collect other data about you, including:

- Information regarding your use of our Online Services, including browser and device data, and data collected through cookies, pixel tags, and other technologies
- Demographic data and other data provided by you
- Aggregated data relating to your stays

How We Collect Personal Data

1. **Online Services and Marketing Activities** – We collect Personal Data through our Online Services and Marketing Activities when you:

- Research and book a reservation
- Purchase products or services
- Make a customer service request
- Respond to a survey
- Update your contact information
- Participate in a competition, promotional activity, or sweepstakes
- Provide a testimonial, story, review, or comment
- “Like,” “Follow,” or otherwise connect with or post to one of our social media pages

- Interact with an email we send

2. **Offline Activities** – We collect Personal Data during your visits to properties we own, operate, franchise, or license, and through other in-person interactions when you:

- Purchase or use on-site products and services, such as restaurants
- Attend promotional events that we host or in which we participate, or when you provide your personal data to facilitate an event.

3. **Business Partners** – We collect Personal Data from companies with whom we partner to provide you with products, services, or offers based upon your experiences at our properties or that may be of interest to you. These business partners are independent from Stay Inns. Examples of our business partners include:

- Owners, franchisees, and licensees
- On-property retail and food and beverage outlets
- Travel agents and tour operators
- Time share partners
- Rental car providers
- Travel booking platforms

4. **Other Sources** – We collect personal data from other sources, such as public databases, joint marketing partners, Guest devices that are connected to Wi-Fi we provide, and other third parties.

5. **Internet-Connected Devices** – We collect personal data from internet-connected devices available in our properties.

#### Why We Collect Personal Data

We collect the personal data above about our Guests so that we can provide an experience that is responsive to your needs and to enhance our offerings to you and our other customers. More specifically, we use the information in connection with the following:

- **Our business transactions with you**, including, but not limited to:
  - Fulfilling bookings
  - Entering into a contract with you
  - Responding to your inquiries and fulfilling your requests
  - Sending administrative information to you (for example, information regarding the Services)
  - Completing and fulfilling any purchases or requests for services
- **Our legitimate business interests**, including, but not limited to:
  - Providing any other specific products, services, and information you request from us

- Providing you our surveys, and other marketing and informational materials regarding our properties, products, and services (subject to your opt out right described in the “Opt Out” section below)
- Personalizing your experience on the Services by presenting products and offers tailored to you
- Allowing you to participate in sweepstakes, contests, and similar promotions, and to administer these activities (each of which may have additional rules and could contain additional information about how we process your personal data)
- Facilitating social sharing functionalities of your social media accounts
- Carrying out data analysis, audits, fraud monitoring and prevention, internal quality assurance, developing new products, enhancing, improving or modifying our Services, identifying usage trends, auditing use and functionality of our Services, helping enforce compliance with our Terms of Use, helping protect our Services, determining the effectiveness of our promotional campaigns, and operating and expanding our business activities
- Allowing you to send messages to a friend through the Services. By using this functionality, you are telling us that you are entitled to use and provide us with your friend’s name and email address
- Fulfilling any other purpose for which you provide your personal data or which we disclose to you at the time of disclosure
- **Any consent you may have provided**, including, but not limited to accommodating special requests due to health conditions.
- We will make it clear to you in advance that we are relying on your consent, and you have the right to decline to provide your consent and, if consent is provided, to withdraw your consent at any time
- **As necessary or appropriate for legal reasons**, including, but not limited to:
  - To comply with our legal obligations
  - To comply with legal process
  - To respond to requests from public and government authorities, including those outside your country of residence
  - To enforce our terms and conditions
  - To protect our operations or those of any of our affiliates and other third parties
  - To protect our rights, privacy, safety, or property, or that of our affiliates, you, or other third parties, including to support and enhance our data security
  - To allow us to pursue available remedies or limit damages we, our affiliates, or other third parties, may sustain

## Security

We seek to take steps to protect the information you provide us from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We have implemented physical, electronic, and managerial procedures to help safeguard and secure your

information from loss, misuse, unauthorized access or disclosure, alteration, or destruction. Unfortunately, no security system is 100% secure, thus we cannot guarantee the security of all information you provide to us via the Services.

#### Your Rights; Region-Specific Disclosures

Individuals in certain jurisdictions may have certain rights with respect to their personal data. These may include the right to access your personal data, to request corrections to your personal data if it is inaccurate, to ask us to erase your personal data, or to restrict or object to the processing of your personal data.

If you make a request related to personal data about you, we may need to verify your identity. You may submit a request using the means described under the “Contact Us” section below.

#### Policy Changes

At times our Privacy Notice may be changed and any updates will be posted to this site. If material changes are made to this Notice, we will post a notice to the revised policy on the homepage of this site for at least thirty (30) days. Any changes that are made will go into effect when posted on the site and they will apply to all users of our Services. We encourage you to check this policy periodically for updates.

#### Contact Us

If you have any questions about this Policy, or any concerns or complaints with regard to the administration of the Policy, please contact us by any of the following means:

- by calling our Compliance Hotline at 855.251.0649
- by mailing a written description of your concern or complaint to:

#### **Stay Inns Hotels**

Chief Compliance Officer  
400 Centre Street  
Newton, MA 02458

- by emailing to [privacyinquiries@sonesta.com](mailto:privacyinquiries@sonesta.com)

#### Sensitive Personal Information

We may collect information that is considered “sensitive” under the CCPA, such as payment card or other financial information, account login information such as username and password, and data concerning health that we may collect from Guests with particular health concerns. When we do so, we use such information only for

lawful purposes in compliance with the CCPA and other applicable privacy laws, such as to perform the services or provide the goods requested by you and to resist malicious, deceptive, fraudulent, or illegal actions. We do not use such information to infer characteristics about individuals.

#### Changes to State Privacy Disclosures

At times our CCPA Disclosures may be changed and any updates will be posted to this site. If material changes are made to this Notice, we will post a notice to the revised policy on the homepage of this site for at least thirty (30) days. Any changes that are made will go into effect when posted on the site and they will apply to all users of our Services. We encourage you to check this policy periodically for updates.

#### Contact Us

To assert one of your legal rights described in these State Privacy Disclosures, or if you have any questions about these CCPA Disclosures or our data handling practices, please contact us by any of the following means:

- by calling our Compliance Hotline at 855.251.0649
- by mailing a written description of your concern or complaint to:

**Stay Inns Hotels**

Chief Compliance Officer,  
400 Centre Street  
Newton, MA 02458

- by emailing to [privacyinquiries@sonesta.com](mailto:privacyinquiries@sonesta.com).