Privacy Policy

Protecting your private information is our priority. This Statement of Privacy applies to www.homespringinn.com and Sonoma Hotel Group, Inc. DBA HomeSpring Inn & Studios and governs data collection and usage. For the purposes of this Privacy Policy, unless otherwise noted, all references to Sonoma Hotel Group, Inc. DBA HomeSpring Inn & Studios include www.homespringinn.com and HomeSpring Inn & Studios. The HomeSpring Inn & Studios website is a lodging site. By using the HomeSpring Inn & Studios website, you consent to the data practices described in this statement.

Collection of your Personal Information

In order to better provide you with products and services offered on our Site, HomeSpring Inn & Studios may collect personally identifiable information, such as your:

- First and Last Name
- Mailing Address
- E-mail Address
- Phone Number

If you purchase HomeSpring Inn & Studios's products and services, we collect billing and credit card information. This information is used to complete the purchase transaction.

Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through HomeSpring Inn & Studios's public message boards, this information may be collected and used by others.

We do not collect any personal information about you unless you voluntarily provide it to us. However, you may be required to provide certain personal information to us when you elect to use certain products or services available on the Site. These may include: (a) registering for an account on our Site; (b) entering a sweepstakes or contest sponsored by us or one of our partners; (c) signing up for special offers from selected third parties; (d) sending us an email message; (e) submitting your credit card or other payment information when ordering and purchasing products and services on our Site. To wit, we will use your information for, but not limited to, communicating with you in relation to services and/or products you have requested from us. We also may gather additional personal or non-personal information in the future.

Use of your Personal Information

HomeSpring Inn & Studios collects and uses your personal information to operate its website(s) and deliver the services you have requested.

HomeSpring Inn & Studios may also use your personally identifiable information to inform you of other products or services available from HomeSpring Inn & Studios and its affiliates.

Sharing Information with Third Parties

HomeSpring Inn & Studios does not sell, rent or lease its customer lists to third parties.

HomeSpring Inn & Studios may share data with trusted partners to help perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to HomeSpring Inn & Studios, and they are required to maintain the confidentiality of your information.

HomeSpring Inn & Studios may disclose your personal information, without notice, if required to do so by law or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on HomeSpring Inn & Studios or the site; (b) protect and defend the rights or property of HomeSpring Inn & Studios; and/or (c) act under exigent circumstances to protect the personal safety of users of HomeSpring Inn & Studios, or the public.

Tracking User Behavior

HomeSpring Inn & Studios may keep track of the websites and pages our users visit within HomeSpring Inn & Studios, in order to determine what HomeSpring Inn & Studios services are the most popular. This data is used to deliver customized content and advertising within HomeSpring Inn & Studios to customers whose behavior indicates that they are interested in a particular subject area.

Automatically Collected Information

Information about your computer hardware and software may be automatically collected by HomeSpring Inn & Studios. This information can include: your IP address, browser type, domain names, access times and referring website addresses. This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the HomeSpring Inn & Studios website.

Use of Cookies

The HomeSpring Inn & Studios website may use "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize HomeSpring Inn & Studios pages, or register with HomeSpring Inn &

Studios site or services, a cookie helps HomeSpring Inn & Studios to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same HomeSpring Inn & Studios website, the information you previously provided can be retrieved, so you can easily use the HomeSpring Inn & Studios features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the HomeSpring Inn & Studios services or websites you visit.

Links

This website contains links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects personally identifiable information.

Security of your Personal Information

HomeSpring Inn & Studios secures your personal information from unauthorized access, use, or disclosure. HomeSpring Inn & Studios uses the following methods for this purpose:

- SSL Protocol

When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Sockets Layer (SSL) protocol.

We strive to take appropriate security measures to protect against unauthorized access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, you acknowledge that: (a) there are security and privacy limitations inherent to the Internet which are beyond our control; and (b) security, integrity, and privacy of any and all information and data exchanged between you and us through this Site cannot be guaranteed.

Right to Deletion

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not be able to comply with requests to delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act;
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, provided we have obtained your informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- Comply with an existing legal obligation; or
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

Children Under Thirteen

HomeSpring Inn & Studios does not knowingly collect personally identifiable information from children under the age of thirteen. If you are under the age of thirteen, you must ask your parent or guardian for permission to use this website.

E-mail Communications

From time to time, HomeSpring Inn & Studios may contact you via email for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication.

If you would like to stop receiving marketing or promotional communications via email from HomeSpring Inn & Studios, you may opt out of such communications by Customers may unsubscribe from emails by calling or emailing the hotel (info@homespringinn.com) and request to opt-out..

External Data Storage Sites

We may store your data on servers provided by third party hosting vendors with whom we have contracted.

Changes to this Statement

HomeSpring Inn & Studios reserves the right to change this Privacy Policy from time to time. We will notify you about significant changes in the way we treat personal information by sending a notice to the primary email address specified in your account, by placing a prominent notice on our site, and/or by updating any privacy information on this page. Your continued use of the Site and/or Services available through this Site after such modifications will constitute your: (a) acknowledgment of the modified Privacy Policy; and (b) agreement to abide and be bound by that Policy.

CALIFORNIA PRIVACY RIGHTS

California Privacy Notice

Effective Date: July 1, 2020

This California Privacy Notice supplements the information contained in our general <u>Privacy</u> <u>Policy</u> and applies solely to those visitors, customers and users that are residents of the State of California ("consumer" or "you"). HomeSpring Inn & Studios, a Sonoma Hotel Group, Inc. Member ("we", "us" or "our") adopts this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), as amended, and other California privacy laws. Any terms defined by the CCPA have the same meaning when used in this notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal information"). Personal information does not include publicly available information, deidentified information, aggregate information, or any information protected by other privacy laws and otherwise excluded from the scope of the CCPA. This table identifies the categories of personal information we have collected directly or indirectly from our consumers within the last 12 months:

Category	Examples	Collected
A. Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers	Yes
	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's listed in license or state identification card number, ecords insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information	Yes
C. Protected classification characteristics under Califor federal law		Yes
D. Commercial informat	ion Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	No
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data	No
F. Internet or other simi network activity	lar Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	Yes
G. Geolocation data	Physical location or movements	No
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	No
I. Professional or employment-related inform	Current or past job history or performance ation evaluations	No

J. Non-public education information (as defined by the Family Educational rights and Privacy Act)	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information,	No
K. Inferences drawn from other personal information	or student disciplinary records Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	No

How We Use Your Information

We may use or disclose the personal information we collect for one or more of the following business or commercial purposes:

- To fulfill the reason you provided the information (e.g., to make your hotel reservation);
- To provide you with the products and services you request;
- To operate, support, personalize, and develop our website;
- To create, maintain, customize, and secure your account with us
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses;
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our website and via email or text message (with your consent, where required by law);
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets;
- For testing, research, analysis, and product development, including to develop and improve our website, products, and services;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA; or
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our customers is among the assets transferred.

Sharing Personal Information

We may disclose your personal information for a business purpose to our service providers and third parties such as our subsidiaries and affiliates, as well as non-affiliated third parties with whom we partner to offer products and services to you.

In the preceding 12 months, we have disclosed the following categories of personal information for a business purpose to the third parties identified above:

Category A. Identifiers

Category B. Personal information listed in the California Customer Records statute

Category C. Protected classification characteristics under California or federal law

Category F. Internet or other similar network activity

[In the preceding 12 months, we have not sold any personal information.]

Your CCPA Privacy Rights and Choices

If you are a California resident, the CCPA provides you with additional rights regarding our use of your personal information. This section describes your CCPA rights and explains how to exercise those rights.

(1) Right to Access Your Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information during the 12 month period preceding your request. Once we receive and verify your request, we will disclose to you the information that you request and we are obligated to provide under the CCPA, which may include:

- The categories of personal information we have collected about you;
- The categories of sources from which we collected your personal information;
- Our business or commercial purpose for collecting your personal information;
- The categories of your personal information we have disclosed for a business purpose;
- The categories of third parties with whom we share your personal information; and
- The specific pieces of personal information we have collected about you.

(2) Right to Request Deletion

You have the right to request that we delete some or all of the personal information that we have collected from you, subject to certain exceptions. Once we receive and verify your request, we will delete (and direct our service providers to whom we have furnished that information to also delete) your personal information from our (and their) records. With respect to the exceptions, we may deny your deletion request in whole or in part if retaining your personal information is necessary for us or our service providers to:

- 1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- 3. Debug products to identify and repair errors that impair existing intended functionality.
- 4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- 5. Comply with the California Electronic Communications Privacy Act;
- 6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
- 7. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us;
- 8. Comply with a legal obligation; or
- 9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

(3) Right to Opt-Out

[You have the right to direct a business not to sell your personal information at any time. Because it is our policy not to sell your personal information, we are exempt from providing any mechanism for you to exercise this right.]

(4) Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not deny you services, charge you different prices for any services, provide you with a different level or quality of services, or suggest that you may receive a different price or rate for services or a different level or quality of services.

Exercising Your Rights

You may request that we disclose or delete your personal information, as described above, by submitting a verifiable consumer request to <u>info@HomeSpringInn.com</u>. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your information. You may only make a verifiable consumer request for access twice within any 12-month period. Your verifiable consumer request must (1) describe your request with sufficient detail so that we may understand, evaluate, and respond to it, and (2) include your name and any email address or phone number you have provided to us, so that we may verify your identity.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and then confirm the personal information requested relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Additional California Privacy Rights

Under California's "Shine the Light" law, you may also have the right to request and receive information about disclosure of your personally identifiable information to third parties for their direct marketing purposes. Because it is our policy not to share personally identifiable information with third parties for third-party direct marketing purposes without consent, we are exempt from the requirement to respond to such requests.

If you have any questions about this California Privacy Notice, please contact us at <u>info@HomeSpringInn.com</u>.

Contact Information

HomeSpring Inn & Studios welcomes your questions or comments regarding this Statement of Privacy. If you believe that HomeSpring Inn & Studios has not adhered to this Statement, please contact HomeSpring Inn & Studios at:

HomeSpring Inn & Studios 1499 Silas Deane Hwy Rocky Hill, Connecticut 06067

Email Address: info@homespringinn.com Telephone number: +1 860-882-0048

Effective as of July 01, 2020