

## **The Brown Palace PRIVACY POLICY**

At the Brown Palace (hereinafter "Hotel"), we are committed to the privacy, confidentiality, and security of user information. The Brown Palace will not disclose identifiable user information to any third party without consent.

While visiting our site, at [www.brownpalace.com](http://www.brownpalace.com) (hereinafter "Site"), we strive to provide you with an Internet experience that delivers the information, resources and services that are most relevant to you. To achieve this goal, part of the operation of the Site includes the gathering of certain types of information about Site users. This Privacy Policy, which applies to the Site, addresses how we treat your information.

This Privacy Policy covers two types of information gathered at the Site, personal and aggregated. The term "personal information" refers to data you voluntarily provide in connection with use of the Site and services that identifies you and/or your company, including, for example, your name, e-mail address, phone number, company affiliation, physical address and/or certain other personal information. The term "aggregated data" refers to general, abstracted information regarding visitors and users of the Site, including traffic patterns, number of visits to certain pages, visits from other web sites or to third-party web sites linked to the Site, use of particular services or features on the Site or on other sites reached through the Site.

### **What information is collected about you? How do we use it?**

We take care to ensure that your personal information in a manner either unknown or disagreeable to you. You may wish to submit an information request about our Hotel, participate in one of our promotions, or subscribe to our e-mail or postal lists. To facilitate your wish, we may ask for certain necessary personal information. Should you provide it, we will only use it for the purpose specified at the bottom of the information-gathering form.

Information collected on the Site may be used to:

- Register you as a Hotel member
- Plan and purchase hotel accommodations
- Enter your email in our promotions or sweepstakes
- Send marketing communications or surveys to you
- Respond to your questions or suggestions
- Improve the quality of your visit to our site

All forms will provide an opt-out button to allow you to choose not to participate in Hotel lists and future online marketing. In deciding whether or not to join such lists, please note that they are only used for Hotel purposes or in joint promotions with a Hotel partner. We do not sell, rent or share any of your personal information with any other party including any third-party joint promoters, nor use it for unapproved commercial purposes. You may request to be removed from our lists at any time. All emails distributed to our lists will contain easy, online access to unsubscribe. You may click follow the directions to unsubscribe or send an email requesting removal of your information to [privacy@thayerinteractive.com](mailto:privacy@thayerinteractive.com).

### **Permission for Use**

Hotel may collect and use personal information that you submit at the Site in any manner that is consistent with uses stated in this Privacy Policy or disclosed elsewhere at the Site at the point you submit such personal information. At the time you submit personal information, the intended use of the information will be apparent in the context in which you submit it. By submitting personal information at the Site, you are consenting to any use that is consistent with uses stated in this Privacy Policy or disclosed elsewhere at the Site at the point you submit such personal information. Such consent will be presumed by Hotel, unless you state otherwise at the time you submit the

personal information. Please do not request any such communications on behalf of an individual or company if you are not authorized to make the request.

### **Secure Reservations**

If you decide to make an online reservation at the Site, you will be linked to a reservation interface housed on the site of and operated by **Secure-Res**. While it may appear to be part of our Site, the Booking Engine is in fact provided **Secure-Res**, and the Privacy Policy at **Secure-Res** governs the treatment of your personal information throughout the reservation process. Naturally, we partner only with companies who share our serious concerns about guarding your privacy and ensuring security of your personal information. You may review the Privacy Policy for **Secure-Res** on the following page: <http://www.sec-res.com/>.

### **Protecting your information: Security**

We want you to feel confident about using the Site for your travel, so we have implemented a security program to keep information that is stored in our systems protected from unauthorized access. Our Site is hosted in a secure environment. The Site servers/systems are configured with data encryption technologies and industry-standard firewalls. When you enter personal information, your data is protected by Secure Socket Layer (SSL) technology to ensure safe transmission.

### **Withdrawing Consent to Use or Changing your Personal Information**

If, after permitting use of your personal information, you later decide that you no longer want Hotel to include you on its mailing list or otherwise contact you or use your personal information in the manner disclosed in this Privacy Policy or at the Site, simply tell us by sending an e-mail to [privacy@thayerinteractive.com](mailto:privacy@thayerinteractive.com) or by clicking on the "Unsubscribe" button at the bottom of our email communication to you.

### **Use of Aggregated Information**

We are constantly improving the Site and adding new features and services. We monitor aggregated data regarding use of the Site for marketing purposes and to study, improve and promote use of the Site. In connection with such purposes, Hotel may share aggregated data with third parties collectively and in an anonymous way. Disclosure of aggregated data does not reveal personal information about individual Site users.

### **Exceptions to the Privacy Policy**

Hotel has two exceptions to these limits on use of personal information:

- (1) Hotel may monitor and, when we believe in good faith that disclosure is required, disclose information to protect the security, property, assets and/or rights of Hotel from unauthorized use, or misuse, of the Site or anything found at the Site.
- (2) Hotel may disclose information when required by law; however, only to the extent necessary and in a manner that seeks to maintain the privacy of the individual.

### **Use of Cookies**

To enable features at the Site, Hotel may assign one or more "cookies" to your Internet browser. Cookies, among other things, speed navigation through our Site, keep track of information so that you do not have to re-enter it each time you visit our Site, and may provide you with customized content. A cookie is an Internet mechanism composed of a small text file containing a unique identification number that permits a web server to send small pieces of information or text by means of your browser and place them on your computer's hard drive for storage. This text lets the web server know if you have previously visited the web page. Cookies by themselves cannot be used to find out the identity of any user.

We use cookies to collect and maintain aggregate information about Site use. While in the process of browsing our site, you supply non-personal information -- what type of destination you're

exploring, etc. We use this aggregated data only as explained in this Privacy Policy. We do not connect aggregated data to any name, address, or other identifying information.

You may occasionally receive cookies from unaffiliated companies or organizations, to the extent they place advertising on our Site or are linked to the Site. These third-party cookies may collect information about you when you "click" on their advertising or content or link. This practice is standard in the Internet industry. Because of the way in which the Internet operates, we cannot control collection of this information by these third parties, and these cookies are not subject to this Privacy Policy.

#### **Children's Privacy & Parental Consent**

This Site is not designed or intended for anyone under age 18, and minors are expressly requested by Hotel not to use this site or submit personal information. Our privacy policy prohibits us from accepting users who are under the age of 18. Should Hotel inadvertently acquire personal information or other data from users under the age of 18, Hotel will not knowingly provide this data to any third party for any purpose whatsoever.

#### **Links Provided To Other Sites**

Hotel may provide links to a number of other web sites that we believe might offer you useful information and services. However, those sites may not follow the same privacy policies as Hotel. Hotel therefore is not responsible for the privacy policies or the actions of any third parties, including without limitation, any web site owners whose sites may be reached through this Site. Please contact the relevant parties controlling these sites or access their on-line privacy policies before submitting any personal information.

#### **Your Consent To This Privacy Policy**

Use of the Site signifies your consent, as well as the consent of the company for whom you use the Site and whose information you submit (if any), to this online Privacy Policy, including the collection and use of information by Hotel, as described in this statement, and also signifies agreement to the terms of use for the Site.

#### **Policy Modifications & Contacting Hotel**

Hotel reserves the right to change this Privacy Policy at any time; notice of changes will be published on this page. Changes will always be prospective, not retroactive. Should the Site make any material changes to the Privacy policy that substantially alter the use of your personal information, Site shall notify you of such change through an email if you have supplied your email address to Site. In that email, you will be afforded an explicit opportunity to remove your Personal Information from Site. If you have questions about our policies, please contact [privacy@thayerinteractive.com](mailto:privacy@thayerinteractive.com).

#### **Effective Date**

This policy, updated in accordance with certain state law requirements, is effective as of July 1, 2004.