



THE EXPLORER HOTEL THE FROBISHER INN PRIVACY POLICY

GUEST INFORMATION

In the provision of services to our guests and marketing of our hotels, we stress the importance of privacy and are committed to earning the trust of our guests by adopting high standards for the protection of personal information.

This policy outlines:

- a. the type of personal information we collect and receive;
- b. the circumstances in which we collect or receive personal information;
- c. the policies and procedures we have established outlining its use and storage, and for sharing certain types of personal information in certain limited circumstances;
- d. the procedures you should follow if you have any questions or requests in respect of your personal information or our policies and procedures; and
- e. the person to whom such questions or requests should be directed, and the means by which to communicate with that person.

In this policy, “personal information” means information about you that is personally identifiable like your name, address, e-mail address or phone number, and that is not otherwise publicly available and is not part of your work identification.

It also includes information on guest preferences and usage, when such information is supplied to or recorded by us in the course of transacting business with an individual.

The Privacy Policy does not apply to information regarding our corporate customers. However, such information is protected by other policies and practices and through contractual arrangements.

WHY WE COLLECT PERSONAL INFORMATION

1. **To establish and maintain a responsible commercial relationship with you and to provide ongoing service.**
2. **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.
3. **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.
4. **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.
5. **To meet legal and regulatory requirements.**

HOW YOU MAY PROVIDE US YOUR PERSONAL INFORMATION

1. By making a reservation or by using our services.
2. By registering with our loyalty or recognition program(s).
3. By registering on our websites.
4. By providing it to us in communications regarding service delivery such as comment cards and customer surveys.
5. By providing the information to us by participating in a marketing initiative.
6. By visiting our websites.

Below we will outline the type of information normally collected in each of these circumstances, the reasons for doing so, how we will use it and store it.

MAKING A RESERVATION

When making a reservation or using our services it is necessary to have information in order to identify you, contact you and to process your purchase and requests. This information usually includes your name, address, phone number, e-mail address, credit card number and expiration date, and language preference. It may also include, if you choose to share that information with us, your preferences regarding the delivery of your service such as type of room, type of bed, and the like. You may wish to have your purchase of our services recognized in a third party's loyalty program with which we have a relationship. To do so will require you providing us certain verification information such as your membership number in the third party program. We may also offer special discounts from time to time that may have qualifying criteria. Sometimes we offer special offers to, for example, seniors or for children. To assess your eligibility and process your reservation correctly, we may record your date of birth at the time of booking. You may be required to provide personal identification with your date of birth in order to verify this upon check-in.

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.

We may use the information you provide to send you offers and information about our services and those of select third parties as well as newsletters and shared content that may be of interest to you.

If you do not wish to receive such offers and information you may unsubscribe or opt-out by sending an email to HR@nunastar.com, using the subject line "Unsubscribe", so indicating your request with sufficient personal identifiers so we can appropriately act on your request. All our marketing communication of this type will also contain instructions for unsubscribing.

REGISTERING WITH OUR LOYALTY OR RECOGNITION PROGRAM(S)

As our customer you have the opportunity to belong to our loyalty or recognition programs. Such programs are designed to deliver a higher level of personalization and service, additional personal information will be required. Membership is voluntary. By choosing to enroll you have consented to the supply of and use of your personal information as more particularly outlined in the terms and conditions for the loyalty or recognition program.

REGISTERING ON OUR WEBSITES

Individuals interested in sharing their experiences at our hotels may wish to do so through our websites. Although registration is not required to view the site, it is required to enable sharing and other functions on that website. The personal information you provide during registration is used to validate your identity and to enable us to manage and administer your contributions to the website, and to contact you regarding your contributions or use of the website. We may also use your information to contact you about updates or changes to the website, shared content that may be of interest to you, or other offers and information related to our hotels or marketing partners whose products and services may be of interest to you.

We may from time to time use third party service providers to facilitate the operation of our websites. As a result, your personal information may be accessed, administered or stored by such third parties to the extent reasonably required for them to perform such services. Some service providers may be located in other jurisdictions that do not have privacy legislation similar to that found in Canada, and information in such jurisdictions may be accessed pursuant to the laws of those countries.

INFORMATION PROVIDED TO US IN COMMUNICATIONS REGARDING SERVICE DELIVERY SUCH AS COMMENT CARDS AND CUSTOMER SURVEYS

Information provided to us in such a fashion 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.

WE OFFER YOU THE ABILITY TO RECEIVE TARGETED, TIMELY NOTIFICATION OF TIME SENSITIVE OFFERS

To sign up for this service we require you to provide us with your name and e-mail address. 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.

BY VISITING ONE OF OUR WEBSITES

We use "cookies" on our websites. Cookies are pieces of information that an Internet site transfers to your hard drive for record-keeping purposes. The use of cookies is an industry standard -- you'll find them almost everywhere on the Internet. We use cookies to recognize visitors when they return to our sites. Once we know it's you, we can customize your online visit. You may choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. Refer to your browser's Help Menu to learn how to modify your browser's cookie settings.

We may also evaluate our content and services and tailor our websites, for visitors, based on other information we collect, such as IP addresses, which are numbers assigned to your computer whenever you use the Internet, pixel tags (or clear gifs), and the type of Internet browser or operating system you are using. This information is collected in the aggregate, but we may tie it to your personal information through cookie use as described above.

We may use Google Analytics and Adobe Analytics to measure how visitors interact with content on our websites. We also use Facebook Custom Audiences to ask Facebook to show you ads that are customized based on your interaction with our websites or our Facebook applications and to measure how you interact with those ads. All of these services use cookies and similar technologies, such as web beacons, tags and embedded scripts, to record information about your interaction with our websites. Additional information on how these services use such technologies can be found on **Google's website**, **Adobe's website** and **Facebook's website**. The principles summarize how Google protects information collected through Google Analytics. **Adobe's Privacy Policy** summarizes how Adobe protects information collected through Adobe Analytics. **Facebook's Data Use Policy** describes how Facebook protects information collected through Facebook Custom Audiences.

If you do not wish to have data relating to your visits to our websites collected through Google Analytics, you may opt-out by installing the **Google Analytics opt-out browser add-on**. You may also opt-out of data collection through Adobe Analytics by visiting **Adobe's Privacy Center**. You may opt-out of Facebook Custom Audiences by visiting **Facebook's opt-out page**.

WHEN DO WE DISCLOSE PERSONAL INFORMATION

We disclose personal information only in these limited circumstances:

1. We may disclose a guest's personal information to a person who, in our reasonable judgment, 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.
2. 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.
3. Personal information may be shared with our other hotels so that they may better provide services to you in the event you wish to travel to our other hotels in the future.
4. 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.
5. Personal information may be shared with a third party retained by us to perform functions on our behalf such as reservations handling, data processing or storage, guest surveys or research, and the distribution of email or other forms of communication.
6. Personal information may be shared with an agent retained by us to evaluate a customer's credit worthiness or in order to collect a customer's account.
7. Personal information may be shared with a public authority or an agent of public authority if in our reasonable judgment 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 us 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

1. We will not collect, use or disclose your personal information for any other purpose than those identified above, except with your consent.
2. We will protect your personal information with appropriate security safeguards.
3. We will take appropriate steps to protect the confidentiality of your personal information when dealing with third parties.
4. We will honour your request to access your personal information in as timely fashion as is reasonably possible.

You are always free to refuse to provide personal information to us.

You may also withdraw your consent with respect to the use of your personal information for marketing purposes at any time, subject to legal or contractual restrictions and reasonable notice, by e-mailing us at HR@nunastar.com, using 'Unsubscribe' as the subject line, and providing us sufficient personal identifiers so we can act effectively on your request.

However, in either case, this may limit our ability to serve you.

If you have questions or concerns about our privacy practices or wish to make a request in respect of your personal information please contact our Privacy Officer at HR@nunastar.com, or if you prefer by writing us at:

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Attention: Privacy Officer

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