

GLOBAL PRIVACY POLICY FOR GUESTS

1. Introduction

We use your personal information in order to fulfill our commitment to providing an unparalleled guest service experience. As part of that undertaking, we are committed to safeguarding the privacy of the personal information that we gather. As one of our guests, you understand and agree that we collect, use and disclose your personal information in accordance with this Global Privacy Policy for Guests (this “**Policy**”).

2. The Application of this Policy

This Policy applies to personal information regarding guests and the other individuals with whom we do business or who visit us and to the use of that personal information in any form – whether oral, electronic or written.

This Policy gives effect to Hotel Hacienda Cocoyoc’s commitment to protect your personal information and has been adopted by all of the separate and distinct legal entities that manage, operate, franchise, own and/or provide services to the Hotel Hacienda Cocoyoc around the world. Those entities include Hotel Hacienda Cocoyoc and its direct and indirect subsidiaries, and all of the separate and distinct legal entities that own Hotel Hacienda Cocoyoc worldwide, whether branded Hotel Hacienda Cocoyoc or not. References to “Hotel Hacienda Cocoyoc”, “**we**” and “**our**” throughout this Policy, depending upon the context, collectively refer to those separate and distinct legal entities, including the entity with which you have made your booking.

If we disclose the personal information we hold about you to other of our affiliated hospitality businesses, those entities must first have agreed to be bound by this Policy with respect to their processing of your personal information.

While this Policy is intended to describe the broadest range of our information processing activities globally, those processing activities may be more limited in some jurisdictions based on the restrictions of their laws. For example, the laws of a particular country may limit the types of personal information we can collect or the manner in which we process that personal information. In those instances, we adjust our internal policies and/or practices to reflect the requirements of local law.

3. Types of Personal Information We Collect

The term “personal information” in this Policy refers to information which does or is capable of identifying you as an individual. The types of personal information that we process (which may vary by jurisdiction based on applicable law) include:

- your name, gender, home and work contact details, business title, date and place of birth, nationality and passport and visa information;
- guest stay information, including the hotels where you have stayed, date of arrival and departure, goods and services purchased, special requests made, observations about your service preferences (including room and holiday preferences), telephone numbers dialled and faxes and telephone messages received;
- your credit card details, Hotel Hacienda Cocoyoc’s frequent guest program member information, online user account details, profile or password details and any frequent flyer or travel partner program affiliation;

- any information necessary to fulfill special requests (e.g., health conditions that require specific accommodation, purchase of goods and services);
- information you provide regarding your marketing preferences or in the course of participating in surveys, contests or promotional offers;
- information collected through the use of closed circuit television systems, card key and other security systems;
- contact and other relevant details concerning the employees of corporate accounts and vendors and other individuals with whom we do business (e.g., travel agents or meeting and event planners); and
- in limited cases, information relating to the credit of customers.

Most of the personal information we process is information that you or someone acting on your behalf knowingly provides to us. However, in some instances, we process personal information that we are able to infer about you based on other information you provide to us or on our interactions with you, or personal information about you that we receive from a third party.

There may be instances in which the personal information that you provide to us or that we collect is considered “Sensitive Personal Information” under the privacy laws of some countries. Those laws define “Sensitive Personal Information” to mean personal information from which we can determine or infer an individual’s racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership of a trade union or professional association, physical or mental health or condition, genetic data, sexual life or judicial data (including information concerning the commission or alleged commission of a criminal offence). We only process “Sensitive Personal Information” in your jurisdiction if and to the extent permitted or required by applicable law.

4. How We Use Personal information

Subject to applicable laws, we may collect, use and disclose relevant portions of your personal information in order to:

- provide and charge for the hotel accommodation and other goods and services you purchase;
- provide you with a better, more personalised level of service;
- administer the Hotel Hacienda Cocoyoc’s frequent guest program;
- fulfil contractual obligations to you, anyone involved in the process of making your travel arrangements (e.g., travel agents, group travel organizers or your employer) and vendors (e.g., credit card companies, airline operators and other loyalty programs);
- conduct market research, customer satisfaction and quality assurance surveys, direct marketing and sales promotions;
- respond to requests for information and services;
- provide for the safety and security of staff, guests and other visitors;
- administer general record keeping;
- meet legal and regulatory requirements; and
- process credit applications (in the context of Hotel Hacienda Cocoyoc).

5. Disclosures of Your Personal information

From time to time, we may disclose your personal information. We would always

make that disclosure in accordance with applicable law. Circumstances where we might make such disclosure (in addition to those described in Section 4 above) include:

- **5.1 Our Agents, Service Providers and Suppliers** Like most international hotel brands, we may outsource the processing of certain functions and/or information to third parties. We may also engage market research firms to assist us in contacting guests for the purpose of market research and quality assurance. When we do outsource the processing of your personal information to third parties or provide your personal information to third party service providers, we oblige those third parties to protect your personal information with appropriate security measures and prohibit them from using your personal information for their own purposes or from disclosing your personal information to others. **5.2 Credit Authorization** When you request credit, your personal information will be used and disclosed to appropriate third parties in accordance with applicable laws for the purpose of determining whether to grant and maintain a line of credit to you. **5.3 Business Transfers** As we continue to develop our business, we may sell hotels and other assets, or cease being the manager or franchisor of a hotel that is currently part of our portfolio. In those circumstances, we may include the personal information collected about you, or control of that personal information, as a business asset in any such transfer. Also, in the unlikely event that we, or substantially all of our assets, are acquired, personal information collected from you, or control of such information, may be one of the transferred assets. **5.4 E-Folio Program** If you are an employee or independent contractor of a company that participates in Hotel Hacienda Cocoyoc's E-Folio Program, and you use the corporate credit card that is provided to you by your employer (if you are an employee) or corporate client (if you are an independent contractor) to pay for your hotel bill at a the Hotel Hacienda Cocoyoc, an extract of your bill detailing the goods and services provided to you during your stay will be transferred electronically to the credit card network operator, the credit card issuer and/or their respective subcontractors, who will, in turn, forward that extract to your employer or corporate client (and/or their respective subcontractors) to facilitate the processing and tracking of the travel-related expenses of their employees and/or independent contractors. The personal information that is transferred to that credit card network operator, credit card issuer and/or their respective subcontractors for onward transfer to your employer or corporate client (and/or their respective subcontractors) is no longer subject to the protections described in this Policy, but rather your own arrangements with your employer or corporate client, the relevant credit card network operator, the relevant card issuer and/or their respective subcontractors. **5.5 Legal Requirements** We reserve the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to

protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting, tax rules and regulations and any specific record retention laws.

6. Centralized Data Processing Activities

Like most international businesses, we have centralized certain aspects of our data processing activities in accordance with applicable laws, which, in many instances, will result in the transfer of your personal information from one country to another. For example, if you make a reservation outside of Mexico, the personal information gathered in that process will be transferred to and processed in the United States and Mexico. The jurisdictions where that information will be processed may or may not have laws that seek to preserve the privacy of personal information. Nevertheless, whenever your personal information is transferred within the Hotel Hacienda Cocoyoc's companies, your personal information will be processed in accordance with the terms and conditions of this Policy and applicable laws.

7. Information We Collect When You Visit Us Online

If you choose to obtain information or do business with us online by visiting www.hcocoyoc.com or other Hotel Hacienda Cocoyoc websites, you may wish to know the following:

- **7.1 You Can Browse Without Revealing Your Identity** You can always visit our websites without revealing who you are or providing any personal information. **7.2 Usage Information** When you visit our websites, we collect usage information (i.e., the Internet Protocol address automatically assigned to your computer each time you browse the Internet, the date and time of your visit, the type of Internet browser you use and the URL of any other website that referred you to our website, and the pages you access and the amount of time you spend on each page), but that information is not linked to you as an individual unless you create a user profile. We use this information to evaluate and improve the features, guest experience and functionality of our websites. **7.3 Cookie Technology** We use "cookie technology" on our websites to allow us to evaluate and improve the functionality of our websites. Cookies by themselves cannot be used to reveal your identity. They identify your browser, but not you, to our servers when you visit our websites. If you do not want to accept cookies, you can block them by adjusting the settings on your Internet browser. However, if you block them, you will not be able to use all of the features of our websites, including the customization features associated with creating a user profile. Further information about cookies and how they work is available at allaboutcookies.org. **7.4 Creating a User Profile** You can create a user profile on www.hcocoyoc.com to, among other things, facilitate your online transactions, to tailor your experience on our websites to your interests and make more appropriate recommendations to you. We may use the information you provide in your user profile to populate other databases maintained by us and our service providers, as applicable. By creating a

user profile, you are agreeing that we may use the personal information you provide for these purposes. You can view, update or remove any personal information that you have provided to us for inclusion in your user profile by amending your user profile online or emailing info@hcocoyoc.com. If you subsequently elect to remove your user profile, we will have the right to use any personal information previously provided by you for inclusion in your user profile for record keeping and quality assurance purposes. Even if you choose not to create a user profile, you can still use our websites to search for and purchase services.

7.5 Links to Other Websites If you visit www.hcocoyoc.com and decide, for example, to purchase a gift certificate, make an airline reservation, rent a car, submit award request forms or apply for a job online, you will be seamlessly linked to websites maintained by third parties with whom we have contracted to provide those services. If you click on a link found on our websites or on any other website, you should always look at the location bar within your browser to determine whether you have been linked to a different website. This Policy, and our responsibility, is limited to our own information collection practices. We are not responsible for, and cannot always ensure, the information collection practices or privacy policies of other websites maintained by third parties or our service providers where you submit your personal information directly to such websites. In addition, we cannot ensure the content of the websites maintained by these third parties or our service providers, even if accessible using a link from our websites. We urge you to read the privacy and security policies of any external sites before providing any personal information while accessing those sites.

7.6 Security Because the security of your personal information is important to us, we use Secured Socket Layer (“SSL”) software with up to 128-bit encryption in order to encrypt the personal information that you provide to us. If your browser is SSL enabled (which most are), your transmission of personal information to us online will be encrypted. You can verify whether your personal information is transmitted using SSL encryption by confirming the symbol of a closed lock or solid key on the bottom bar of your browser window. You can also verify that your personal information will be encrypted using SSL encryption by making sure that the prefix for the web address listed for that page has changed from “http” to “https”. If you do not see the appropriate symbol and the “https” prefix, you should not assume that the personal information that you are being asked to provide will be encrypted prior to transmission. The personal information we collect from you online is stored by us and/or our service providers on databases protected through a combination of physical and electronic access controls, firewall technology and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, misuse or alteration of personal information and we are not responsible for any damages or liabilities relating to any such incidents to the fullest extent permitted by law.

7.7 Minor Children Our websites do not sell products or services for

purchase by children. If you are under the age of 18 (or a minor in the jurisdiction in which you are accessing our websites), you may only use our websites with the involvement of a parent or guardian.

8. Choice

You may always choose what personal information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected (for example, we cannot take a reservation without a name).

If you provide us with your contact details (e.g., postal address, email address, telephone number or fax number), we may contact you to let you know about the products, services, promotions and events offered that we think you may be interested in. We may also share your personal information with carefully selected third parties, who may communicate directly with you. You can always choose whether or not to receive any or all of these communications by contacting us as described in Section 11 below or following the “unsubscribe” instructions contained in the communications.

If you have an Hotel Hacienda Cocoyoc account, we ask you to indicate your communication preferences at the time you apply for membership or when you create your user profile. We may also ask you to indicate how you would like to receive any offers, marketing and promotional information (i.e., via email or regular mail) and whether you would be willing to participate in surveys. Once you have indicated your preferences, you can always change your mind.

In some jurisdictions, data privacy laws may require us to obtain your consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g., where communications are required in order to fulfill your requests and/or where you have volunteered information for use by us). In other cases, we may seek your consent expressly in accordance with applicable laws (e.g., where the information collected is regarded to be of a sensitive nature under local regulations).

We will abide by any request from you not to send you direct marketing materials. When such a request is received, your contact details will be “suppressed” rather than deleted. This will ensure that your request is recorded and retained unless you provide a later consent that overrides it.

9. Updating or Accessing Your Personal Information

With some limited exceptions, you have rights to access and update personal information held about you. If you want to inquire about any personal information we may have about you, you can do so by sending us a written request by letter or email to the addresses set out in Section 11 below. Please be sure to include your full name, address and telephone number and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information, we may require to make that determination.

We reserve the right to charge you a fee, if permitted under applicable law, which is usually around US\$20 for processing any such request. Where you make more

than one request in quick succession, we may respond to your subsequent request by referring to our earlier response and only identifying any items that have changed materially.

You may request that we correct, or stop processing, personal information that we hold about you. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree and record the fact that you consider that personal information to be incorrect in the relevant file(s).

10. Changes to this Policy

Just as our business changes constantly, this Policy may also change. To assist you, this Policy has an effective date set out at the end of this document.

11. Request for Access to Personal Information/Questions or Complaints

If you have any questions about this Policy, or any concerns or complaints with regard to the administration of the Policy, or if you would like to submit a request (in the manner described in Section 9 above) for access to the personal information that we maintain about you, please contact us by any of the following means:

- by calling one of the following toll-free reservation numbers located at <http://en.hcocoyoc.com/reservations.html>;
- by mail at Hotel Hacienda Cocoyoc, Attn: Relaciones Públicas, Carretera Federal Cuernavaca-Cuautla Kilómetro 32.5 62736, México; or
- by contacting the front desk at the Hotel Hacienda Cocoyoc.

If you are not satisfied with the response that you receive, you can escalate your concern to the Chief Privacy Officer by sending an email to info@hccoyoc.com

While this Policy alone does not create contractual rights, Hotel Hacienda Cocoyoc has ensured compliance with some of its legal obligations in some countries in relation to personal information by creating a set of binding Standards and Policies (known in some countries as binding corporate rules), approved by a number of national privacy regulators. As a result, depending on your circumstances and location, you may be able to enforce your privacy rights using those Standards or Policies through that regulator or a court. If you would like to know more about these standards and commitments, please contact Hotel Hacienda Cocoyoc at the address above or the Chief Privacy Officer at the email address above.

All requests for access to your personal information must be submitted in writing by letter or email. We may respond to your request by letter, email, telephone or any other suitable method.

Effective Date: 6 June 2013