

# PRIVACY POLICY

## **1. GENERAL:**

- a. This Privacy Policy ("**Privacy Policy**") is provided by BellaCollina.com and its employees, associates, related companies, subsidiaries and affiliates (collectively referred to as "**Bella Collina**", "**Group**", "**We**", "**Our**" or "**Us**").
- b. This Privacy Policy describes how and when We collect your personal information, what that information may be used for, who uses it, when it may be disclosed to other parties, how you can access your details and seek correction of your details, the control your own personal information and how you can contact Us.
- c. By visiting Bella Collina website (<http://www.bellacollina.com>) ("**Website**"), you are deemed to have read and agree to be bound by this Privacy Policy.

## **2. NOTICE:**

- a. We may vary or update this Privacy Policy from time to time. We will notify you of these changes to Our Privacy Policy on Our **Website**. Please check our Website regularly for updates to Our Privacy Policy.

## **3. INFORMATION COLLECTION AND USE:**

- a. We may collect and hold personal information/data ("**Personal Information**") about you or someone else whom you are making a booking for or traveling with ("**Third Party**"), that is, information that can identify you or such Third Party, including without limitation full name, gender, postal and email address, telephone number, nationality, passport number, date and place of birth, visa or other government-issued identification data, other contact details, identification details, credit and debit card number or other payment details, booking and travel information, and other information relevant to providing you with the services you and/or the Third Party are, or someone else you know is, seeking, which we receive from you through Our Website, call center, social media sites, walk-in or distribution channels, including online travel agencies. If you submit Personal Information of a Third Party to us, you agree that you have obtained the consent of such Third Party to provide us with their Personal Information and to view or change their information and you permit us to use the Personal Information in accordance with this Privacy Policy. You agree to indemnify us in the event we suffer any loss or damage as a result of your failure to comply with the same.
- b. We may collect other data which do not generally reveal your specific identity or do not directly relate to an individual. To the extent other data reveal your specific identity or relate to an individual, we will treat other data as Personal Information. Other data

include: browser and device data, app usage data, data collected through cookies (see the COOKIES section below), pixel tags and other technologies, demographic data and other data provided by you and aggregated data.

- c. You are responsible for ensuring that the Personal Information you provide us is accurate, complete and not misleading and that such Personal Information is kept up to date.
- d. We may collect Personal Information in one or more of the following circumstances or for one or more of the following purposes:
  1. to process your booking and for other operational and administrative purposes, including without limitation, processing bills and payments, travel notification, manage your account;
  2. to complete your reservation and stay, for example, to process your payment, ensure that your room is available and provide you with customer related service;
  3. when you access Our Website or use any of Our mobile Apps. If you are using a mobile device when browsing Our Website or make any bookings through Our Website or mobile apps, we may collect your IP address or other device identifier, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and other portable device information;
  4. to provide you or someone else you know customer support and services;
  5. to undertake various activities that are required by law;
  6. for administrative, operational, marketing, planning, product or service development, troubleshooting and research requirements;
  7. to send you information on products and services, and special or promotional offers, newsletters or customer survey forms, market research and questionnaires;
  8. as part of a program you have joined (e.g. loyalty program) or purchase you have made to offer and manage your participation in the loyalty program, send you offers, or promotions and information about your account status and activities;
  9. for data analysis, audits, security and fraud monitoring and prevention (including with the use of closed circuit television, card keys and other security systems), developing new goods and services , enhancing, improving or modifying Our services, identifying usage trends, determining the effectiveness of Our promotional campaigns and operating and expanding Our business activities;
  10. when you log into Our hotel's WiFi or have your WiFi settings switched on in Our hotels. Where you are using a mobile device whilst in Our hotels with its

WiFi capability switched on or have access to Our free WiFi, we may additionally collect your phone operating system details, MAC address and location data whilst you are within Our Hotels or immediately within its perimeters. If you do not want us to track your device or use your information in this way, please turn off the WiFi capability on your phone or other electronic device within your settings;

11. when you engage with us on social media (by mentioning/tagging us or by contacting us directly);
  12. to resolve disputes or enforcement of Our Terms and Conditions available at Our Website (**Please refer to Terms and Conditions**); and
  13. for any purpose made known to you at the time of collection of your Personal Information (collectively referred to as “**Purposes**”).
- e. At any time you may opt-out of receiving marketing communications from us by contacting us (see the CONTACTING US section below) and we will ensure that your name is removed from Our mailing list.
- f. We use general, aggregated information to generate statistics and measure site activity to improve the usefulness of customer visits. Such information does not include Personal Information.
- g. We may disclose your information:
1. to Our related companies, affiliates, advisors, contractors, vendors or service providers for the purposes of operation and maintenance of Our Website or Our business, for cross-promotional purposes and to otherwise provide customer support and services to you;
  2. to owners and operators of Our franchised hotels or Our business partners and investors;
  3. to other third parties with whom we have commercial relationships, for marketing, advertising and related purposes, unless you have indicated that you do not wish for us to disclose to such third parties for marketing and advertising purposes;
  4. social media websites;
  5. to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Tune Hotels’ businesses, assets or stocks (including any bankruptcy or similar proceedings);
  6. as required or authorized under law or provided in co-operation with any governmental authority; and
  7. if you fail to provide us with Personal Information stated in paragraph 3(a) above, we may not be able to perform and/or carry out any of the Purposes.

**4. SENSITIVE INFORMATION:**

- a. The term “sensitive information” refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, traded union membership, health, or sexual orientation, genetic information, criminal background and any biometric data used for the purpose of unique identification. In some jurisdictions, mobile phone numbers, location data, and information contained on identity documents also are considered sensitive information.
- b. We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. We may use health data provided by you to serve you better and meet your particular needs (for example, the provisions of disability access).

**5. TO PREVENT FRAUD:**

- a. We share your financial information including your credit, debit card or other payment information with third parties to ensure that your payment is safe and that your details are not being used fraudulently. This data sharing enables us to conduct fraud analysis which ensures that genuine and accurate payment details are provided to us for any purchase. We may share your personal data with credit agencies if you are requesting credit.

**6. MARKETING AND PROMOTIONAL COMMUNICATIONS:**

- a. We may use the Personal Information provided to send you information on products and services, and special or promotional offers offered by any member of the Group, newsletters or customer survey forms and questionnaires via SMS, post and email unless you have indicated that you do not wish to receive such materials.
- b. You may opt-out of receiving any communications from us at any time by clicking on the “unsubscribe link” on the relevant email communications or contact us with your request (see the CONTACTING US section below).

**7. SECURITY OF YOUR PERSONAL INFORMATION:**

- a. We will take reasonable steps to protect any Personal Information we receive from you via Our Website from misuse and loss and from unauthorized access, modification or disclosure. We may hold your information in either electronic or hard copy form or retain third parties to hold that information on Our behalf. Where required by applicable laws, Personal Information will be destroyed or de-identified when no longer needed.
- b. By providing us with Personal Information or using Our services or Our Website, you consent to the transfer, storage and processing of Personal Information to where Our servers, central database and system facilities are located and/or operated, which may

be outside your country of domicile or the location where you access Our Website to provide Personal Information, and which may include, among others, the United States and other countries.

- c. However, as the Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us and you do so at your own risk.

#### **8. LINKS TO OTHER WEBSITES:**

- a. Our Website may contain links to websites operated by third parties (“**Third Party Websites**”). We are not responsible for the privacy practices or the content of Third Party Websites. Third Party Websites are responsible for informing you about their own privacy practices.

#### **9. ACCESS AND CORRECTION:**

- a. You may request access to any Personal Information we hold about you or any Third Party whose Personal Information you had provided at any time by contacting us (see the CONTACTING US section below). Where we hold information that you are entitled to access, we will endeavour to provide you with suitable means of accessing it (e.g. by emailing or mailing it to you).
- b. If you believe that Personal Information we hold about you is incorrect, incomplete or inaccurate, then you may request amendment of it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the Personal Information stating that you disagree with it.
- c. To the extent not limited by any other applicable law, we may:
  1. charge a fee for processing your request for access or correction to the Personal Information; and
  2. refuse to comply with your request for access or correction to the Personal Information and give you a reason for Our refusal.

#### **10. PERSONAL INFORMATION FROM CHILDREN:**

- a. We do not knowingly collect Personal Information from individuals under 18 years of age. As a parent or legal guardian, please do not allow your children to submit Personal Information without your permission.

#### **11. COOKIES:**

- a. We use cookies in Our Website to:-
  1. maintain your session and required details when you browse Our Website or during registration or the booking process (session cookie);
  2. collect website usage data for statistical/analytics purposes (analytics cookie);and

3. direct you to the correct landing page based on your geo-location (geo-targeting cookie).
- b. You may instruct your browser, by changing its setting, to stop accepting cookies or to prompt you before accepting a cookie from the websites that you visit. Note that Our Website will not function properly if the cookie setting is disabled.

**12. CONTACTING US:**

- a. If you have any questions about Our Privacy Policy, or any concerns or a complaint regarding the treatment of your privacy by us, please contact us at:-

Name: Johnny Sideri  
Designation: Director of Hotel Operations  
Email: jsideri@bellacollina.com  
Address:  
The Club at Bella Collina  
16355 Vetta Drive  
Montverde, FL 34756  
Phone: (407) 469-4992

**13. UPDATES TO THE PRIVACY POLICY:**

- a. The “Last Updated” legend at the top of this page indicated when this Privacy policy was last revised. We may modify this Privacy Policy from time to time. Any changes to Our Privacy Policy will become effective when we post the revised Privacy Policy on the site. Use of the Website, any of Our products and services, and/or providing consent to the updated Privacy Policy following such changes constitutes your acceptance of the revised Privacy Policy then in effect.

**14. MISCELLANEOUS:**

- a. In the event of any inconsistency between the English version and other language versions of this Privacy Policy, the terms of this English version shall prevail.