

Privacy Policy

Hilton Sandestin Beach Golf Resort & Spa

At Hilton Sandestin Beach Golf Resort & Spa, we strive to deliver outstanding products, services and experiences at our beautiful beachfront property located in Destin on Florida's Emerald Coast. We value your business and, more importantly, your loyalty. In recognizing that personal privacy is an important issue to everyone, we have developed this Privacy Statement ("Statement") to explain the practices of Sandestin Beach Hotel, Ltd., d/b/a Hilton Sandestin Beach Golf Resort & Spa ("Hilton Sandestin," "we," or "us") regarding the personal information we collect from you or about you whether on this site, through written or verbal communications with us, information collected when you visit our property or from other sources.

Also, please note that this Statement does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as airlines, car rental companies and other service providers, companies that organize or offer packaged travel arrangements, marketing partners, corporate customers or any other person or entity that are beyond the direct and complete control of Hilton Sandestin.

Personal Information We Collect

At every touch point or guest interaction, and in conducting every aspect of our business, we may collect personal information. This personal information may include: your contact information; information related to your reservation, stay or visit to our property; participation in a membership or loyalty program; participation in a sweepstakes or marketing program (even if you do not stay at our hotel); information related to the purchase and receipt of products or services; personal characteristics, nationality, income, passport number and date and place of issue; travel history; payment information; guest preferences; marketing and communication preferences; information about vehicles you may bring onto our property; reviews and opinions about our property; frequent flyer or travel partner program affiliation and member number; hotel, airline and rental car packages booked; groups with which you are associated for stays at our property; information provided on membership and account applications; and other types of information that you choose to provide to us or that we may obtain from third parties. We may also record details on joint travelers, including their names and frequent flyer numbers, and the age of the driver of the rental car. We may also collect and keep information and records related to conversations, including recording or monitoring customer service calls.

In addition we collect other personal information in certain cases, such as:

- *Surveys:* We may request demographic data or other personal information in customer surveys.
- *On-property Collection:* Local laws may require that we collect additional personal information during registration/check-in at our property. We may also use closed circuit television and other security measures at our property that may capture or record images of guests, visitors in public areas and information related to your location while on our property via keycards and other technologies. We may also use other technologies that record sound or video to protect our staff. In addition, we may collect personal information in connection with on-property services, such as concierge services, health clubs, spas, activities, child care services, and equipment rental.
- *Event Profiles:* If you plan or participate in an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organization (name, annual budget, and number of sponsored events per year). We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event. If you visit us as part of an event, we may share personal information about you with the event planners so they may include you as part of the event. If you are an event planner we may also share information about your event with third-party service providers who may market event services to you.
- *Social Media:* If you choose to participate in certain social media activities or offerings supported by us, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. You should understand that you may be subject to the terms and conditions and any privacy policies of the social media site and that Hilton Sandestin is not responsible for your activities on social media sites.
- *Forward-to-a-Friend:* From time to time, we may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend, whether via the Internet, a stand-alone kiosk or mobile. If you choose to do so, we will ask you for the recipient's name and email address, along with the text of any message you choose to include, or you may be able to use a pre-populated message. By using this feature, you represent that you are entitled to use and provide us with the recipient's name and email address for this purpose.
- *HHonors Program:* The HHonors program is administered through Hilton Worldwide and, therefore, you must read and review the privacy policy of

Hilton Worldwide relative to any information provided to administer the HHonors program and profiles, including transaction and correspondence details. If you are a HHonors member, we may share your personal information with our business partners in order to credit you with points or other benefits earned through your participation in the HHonors program. The information you provide to us at the time of registration may be accessed, reviewed and updated at any time by signing in to your HHonors profile. You may receive additional communications, including HHonors statements, third-party news and offers specifically for HHonors program members and co-branded messages from us, Hilton Worldwide and/or their/our business partners and affiliates. HHonors members of certain levels may also receive post-stay emails from us. You may change the communications you receive from us relative to the HHonors program by logging on to your online account and managing your subscriptions, or by communicating in writing directly to Hilton Worldwide (and including your email address).

Personal Information We Collect from Third Parties

In addition to the information we collect from you directly, we may also infer information about you based on the information you provide to us or from Other Information we receive. (See below for more details about "Other Information.") We may also collect information about you from third parties, including information from our airline, credit card, and other partners, information from social media sites consistent with your settings on such sites, such as social media sign-on programs, and from third-party sources. We may append this information to the information we have on file for you and share it with others consistent with this Statement.

Use of Personal Information Collected About You

We use your personal information to provide the services you request from Hilton Sandestin, or which are part of a program you have joined or a purchase you have made. We also use your personal information to provide you with information about meeting and event planning and access to specific account information for administrative purposes. In addition, we may use your information to: improve Hilton Sandestin's services; provide you with the expected level of hospitality; ensure our site, products and services are of interest to you; process enrollments and applications; and facilitate collections. We also use the information to provide or offer you newsletters, promotions and featured specials, other marketing communications, product or service awareness marketing, and to conduct surveys, sweepstakes, prize draws, and other contests. We may provide these communications online, via email, telephone, mobile/text messaging (including SMS and MMS) and postal mail. We may also

aggregate your personal information with data from third-party sources for purposes of data hygiene and analytics.

eFolio Program: In order to provide the most efficient service, we encourage you to receive your hotel bill via email ("eFolio"). However, you can choose to receive a paper receipt by making such request upon check in or at any time during your stay prior to your departure date. The email address you provided upon making your reservation, or if you are a HHonors member and did not change your email address upon making your reservation, your email address of record, will be used to send you your eFolio. If you would like your eFolio to be sent to a different email address, you can make that request upon check-in or at any time during your stay prior to your departure date. Further, we do not have any mechanism for verifying your email address, so it is your responsibility to ensure that we have the correct (and preferred) email address for you. If you make a reservation for another person and use your email address, your email address will be used to provide their receipt.

How We Share Personal Information

We endeavor to provide you with the same level of service that you have come to expect at all Hilton properties, world-wide. To provide this service, we may share your personal information among members of the Hilton Worldwide Portfolio of Brands, including Hilton Grand Vacations ("Hilton Worldwide"), or service providers that may be located in other areas. Although the data protection laws of these various locations may not be as comprehensive as in the area from where you are traveling, Hilton Sandestin will take appropriate steps to ensure that your personal information is handled as described in this Statement.

- *Electronic Billing Program:* If you participate in a corporate electronic billing program or the eFolio program, billing information will be shared with the credit card provider and if you use a corporate credit card, possibly, your employer.
- *Group Events or Meetings:* If you visit Hilton Sandestin as part of a group event or meeting, information collected for meeting and event planning may be shared with the organizers of those meetings and events, and, where appropriate, guests who organize or participate in the meeting or event.
- *Business Partners:* From time to time we may partner with other companies to provide products or services and may share your information with our business partners to provide those products or services to you. For example, we may help to arrange rental car or other services from our business partners, and share personal information with our business partners in order to provide those services.
- *Co-Sponsors of Promotions:* We also may co-sponsor promotions, sweepstakes, prize draws, competitions or contests with other companies, or we may provide prizes for sweepstakes and contests sponsored by other companies. If you enter

one of these sweepstakes or contests, we may share your information with our co-sponsor or the third-party sponsor.

- *On-property Services:* We may share personal information with providers of on-property services that provide services such as concierge services, spa treatments, golf, or dining experiences.
- *Service Providers:* We rely on service providers to provide certain products and services, such as to facilitate administrative functions and information technology operations, credit card billing, reservations services, providing services in connection with our websites, including airline and rental car packages; communicating news and delivering promotional and transactional materials via email, direct mail, and online and mobile advertising; processing credit card transactions, data hygiene and enhancement services; professional services such as accounting, auditing and legal advice; investigating accident reports; processing insurance claims; and administering sweepstakes, prize draws, competitions and customer surveys. Hilton Sandestin will disclose personal information to service providers at our discretion.
- *Business Transactions:* In the event of a merger, consolidation, sale, liquidation or transfer of assets, Hilton Sandestin may, in its sole and absolute discretion, transfer, sell or assign information collected, including, without limitation, Other Information and personal information, to one or more affiliated or unaffiliated third parties.
- *Other:* In addition, Hilton Sandestin may disclose personal information in order to: (i) comply with applicable laws, (ii) respond to governmental inquiries or requests from public authorities, (iii) comply with valid legal process, (iv) protect the rights, privacy, safety or property of Hilton Sandestin, site visitors, guests, employees or the public, (v) permit us to pursue available remedies or limit the damages that we may sustain, (vi) enforce our websites' terms and conditions, and (vii) respond to an emergency.

Other Information

When you visit and interact with this site, Hilton Sandestin and third parties with whom Hilton Sandestin has contracted to provide services to Hilton Sandestin, may collect Other Information (for example, a catalog of the site pages you visit, and the number of visits to our sites). We use cookies and other technologies to collect this information.

We may also aggregate or anonymize personal information (for example, we may aggregate personal information to calculate the percentage of our users who have a particular telephone area code) or collect demographic data such as date of birth, gender and marital status.

Because Other Information does not personally identify you, such information may be disclosed for any purpose. In some instances, we may combine Other Information with personal information. If we do combine any Other Information with personal information, the combined information will be treated by us as personal information in accordance with this Statement.

Sensitive Information

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership. We do not generally collect sensitive information unless it is volunteered by you. We may use health data provided by you to serve you better and meet your particular needs.

Personal Information from Children

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

Mobile and Location-Based Services

We provide mobile apps that can be downloaded to smart phones. These apps have a variety of functionalities that enhance the customer experience. In addition to providing services, our apps may collect personal and Other Information that will be used in accordance with this Statement. We provide a link to this Statement to customers prior to their downloading of any of our apps.

Our mobile apps may use your device's Global Positioning System (GPS) technology to locate a hotel near you and/or to provide you with relevant location-based information. We may also share this information with third parties. We will abide by your device's settings when accessing any geo-location data. To the extent any geo-location data is combined with personal information, that information will be treated as personal information in accordance with this Statement.

Links to Third-Party Websites

Our site and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties.

Other third-party websites include the landing page of the high-speed Internet provider at our hotel, as well as social media sites (such as Facebook and Twitter) on which Hilton Sandestin may have accounts or fan pages where you may be able to post information and materials.

If you provide information on third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

Protecting Personal Information

Hilton Sandestin will take reasonable measures to: (i) protect personal information from unauthorized access, disclosure, alteration or destruction, and (ii) keep personal information accurate and up-to-date as appropriate. We also seek to require our affiliates and service providers with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use reasonable technology to protect the personal information that you transmit to us via our site. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

For your own privacy protection, we encourage you not to include sensitive personal information in any emails you send to us. Please do not send credit card numbers or any sensitive personal information to us via email.

We will only ask for your confidential personal information or credit card details by telephone when you are booking a reservation or promotional package by telephone. We may email or fax to you a blank credit card authorization form in the event this is the method of payment selected. The form can be completed by you and faxed back to us as directed on the form. We will not contact you to ask for your HHonors account log-in information. If you receive this type of request, you should not respond to it. We also ask that you please notify us at Info@HiltonSandestinBeach.com.

Changing and Accessing Your Personal Information

To the extent required by applicable law, you may be able to request that we inform you about the personal information we maintain about you and, where appropriate, request that we update, correct and/or suppress personal information about you that we maintain in our active database. We will make all required updates and changes within the time specified by applicable law and, where permitted by law, may charge an appropriate fee to cover the costs of responding to the request. Such requests must be submitted in writing to the following address: 4000 Sandestin Blvd. S, Destin, FL 32550. To protect your confidentiality, we can only respond to such requests to the email address that you have registered or otherwise provided to us. Please remember that if you make such a request, we may not be able to provide you with the same quality and variety of services to which you are accustomed.

In addition, in some circumstances based on applicable law, you may request that we cease sharing personal information about you with our business partners or that Hilton Sandestin cease using personal information about you on the grounds that such

personal information was acquired by unjust means or used in violation of law by sending your written request to 4000 Sandestin Blvd. S, Destin, FL 32550. We will seek to honor those requests consistently with applicable law.

Retaining Personal Information

We retain personal information about you for the period necessary to fulfill the purposes outlined in this Statement, unless a longer retention period is required or permitted by applicable law.

Choices – Marketing Communications

If you have given us your contact information (mail address, fax number, email address or phone number), we may want to inform you about our products and services or invite you to events by email, telephone, mobile/text messaging (including SMS and MMS) or post.

Please note, however, that if you change the communications you receive from us as described above, we will not be able to remove your personal information from the databases of affiliates or business partners with whom we have already shared your personal information (i.e., to whom we have already provided your personal information as of the date of your opt-out request).

If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe function in the email you receive from us. Opt-out requests can take up to ten business days to be effective.

Special Notification for California Residents

Individual customers who reside in California and have provided their personal information to us may request information about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. Such requests must be submitted to us at the following address: 4000 Sandestin Blvd. S, Destin, FL 32550. Within thirty days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted to the address other than the address specified in this paragraph.

Statement Modifications

We may modify this Statement from time to time. When we make material changes to this Statement we will post a link to the revised Statement on the homepage of our site. Any changes to our Statement will become effective upon posting of the revised

Statement on the site. Use of the site following such changes constitutes your acceptance of the revised Statement then in effect.

Contact Us

If you have any questions about this Statement or how Hilton Sandestin processes your personal information, please contact us by email at info@HiltonSandestinBeach.com or by postal mail to 4000 Sandestin Blvd. S, Destin, FL 32550.