

Privacy Policy

Fleet Intel Privacy Policy

LAST UPDATED: June 1, 2021

Who We Are

Fleet Intel is privacy conscious global organizations. This means we are committed to protecting the privacy of all individuals who interact with us, whether by registering as a user on our websites in order to receive our data and reports, participating in one of our research projects, or by attending one of our many events held around the world. This approach to privacy applies to all personal information received by us from our customers, whether in electronic, paper or verbal form. It also applies to our websites and how we use the websites to collect information, how we use that information, and the choices that are available to you regarding our use of your personal information. It does not apply to the collection and use of certain FLEET INTEL employment-related information. If you are a current or former FLEET INTEL job applicant, employee, owner, director, officer, or contractor, please contact us for the appropriate policy.

What Information Do We Collect From You and When?

Personal Information Collected for Fleet Intel

If you are an employee of one of our lodging industry clients, or if you purchase data from us directly, we collect corporate information about your organization when you register to use our websites, or when someone in your organization asks that you be added as a user; when you enroll on behalf of your company in our benchmarking program; when you request more information on products or services; when you request one of FLEET INTEL's executives speak to your group, company or association; when you register for; or when you order reports and other products from us. We will also ask for your information if you participate in one of our surveys or other research methods which we conduct on behalf of third party companies or our own behalf.

The personal information we collect usually consists of your name, an email address, phone number and mailing address at which you wish to receive communications from us, your credit card and/or banking information if you are using a personal card or account.

We may collect your personal information from other sources, such as others in your organization, public websites, and news articles about your business or property. If we have not collected your personal information directly from you, and we do not hold specific contact details for you, we may use generic contact details for the hotel or business with which you are

associated to notify you that we are processing your personal data and to inform you of your rights as a data subject with respect to that data.

Personal Information Collected When Visiting Fleet Intel Websites

Also, to ensure that our websites are well managed and to facilitate improved navigation within the sites, we or our service provider(s) use cookies (small text files stored in a user's browser), web beacons (electronic images that allow the websites to count visitors who have accessed a particular page and to access certain cookies), or similar tracking technologies (collectively, "Tracking Technologies") to collect aggregate data. Specifically, we use such Tracking Technologies to track information on our systems and identify categories of visitors by items such as IP address, domain, browser type and pages visited. These Tracking Technologies do not collect any additional personal information about you. We do not link the information collected by these Tracking Technologies to your IP address or anything that could be considered personally identifiable information.

The Tracking Technologies includes Google Analytics for tracking on our Fleet Intel websites.

You may learn more about how Google and use the information they collects by visiting the following sites; 1. "How Google uses data when you use our partners' sites or apps" (located at <https://www.google.com/policies/privacy/partners/>) ; Google's ability to use and share information collected by Google Analytics about your visits to our websites is restricted by the Google Privacy Policy (located at <https://www.google.com/policies/privacy/>).

Finally, we may obtain personal information about you from other sources, such as from others at your place of business (if our main contact at your company asks us to add your name and email to a list of individuals who may be granted website access or be added to a company distribution list), organizations to which you belong or are a member (usually where we are conducting surveys on behalf the organization), and public websites (to confirm office address and contact information). To the extent we combine information obtained from these sources with other information we may have collected about you, we will treat the combined information as personal information under this Privacy Policy. Of course, we are not responsible for the accuracy of any information provided to us by a third party.

Transfer of your personal information

FLEET INTEL is a global business. We may transfer your personal information to the United States, where we are headquartered, and to other countries which may not have the same privacy

laws as the country in which you initially provided the information, but we will protect your Personal Information in accordance with this policy, or as otherwise disclosed to you.

European Economic Area (EEA) Residents

If you live in the EEA, we may transfer personal information to countries for which adequacy decisions have been issued, use contractual protections for the transfer of personal information to third parties, such as an intra-company agreement or the European Commission's Standard Contractual Clauses or their equivalent under applicable law.

Do Not Track Policy

"Do Not Track" is a proposed standard that is currently under development. As it is not yet finalized, we adhere to the standards set out in this Privacy Policy and we do not currently respond to "Do Not Track" signals on our websites.

Why Do We Need The Information That We Collect from You?

Your personal information is used by FLEET INTEL for various legitimate business purposes, all of which are undertaken in order to provide you with the reliable, timely and excellent data delivery, analytics and other services you expect from FLEET INTEL. These purposes are:

- To register you as a user on our websites and other client portals. This applies whether you signed up directly with us as a user, or were identified as a user by someone within your organization.
- For invoicing purposes and for credit card payment processing, using a third party vendor.
- To contact you (whether by phone or email), if necessary, about your order.
- If you are an employee or representative of one of our hotel clients, to contact you to inquire about your data or your competitive set selection, and to discuss your contract renewal.
- To notify you about other FLEET INTEL products and services, or any FLEET INTEL events, in which you may be interested.
- To notify you about any updates or maintenance to our websites.
- To notify you about any corrections or delays in our data reporting.

- For direct marketing and advertising purposes. However, we do not sell our client lists to any other third parties for use in their marketing campaigns. Also, at any time you may opt out of receiving such marketing materials and solicitations from us.
- In relation to our Hotel Data Conference (HDC) or other seminars, conferences and events, for the specific purpose of registering you as an attendee and sending you updates prior to and during the event. In addition, we will provide HDC sponsors with the list of attendees free of charge and as a benefit to them. If you are an HDC attendee but wish to limit how your contact information is used you may opt out.
- FLEET INTEL webmasters use cookie information to analyze the number of visitors to different areas of the websites, to determine how long users are remaining on the sites. This information helps us make sure that our websites are serving as a useful, effective information source for you.
- To contact you to inquire whether you wish to participate in a survey or other research method on behalf of third party companies or on our own behalf.
- If you are a hotel owner, or a main point of contact for a hotel company, for inclusion of your information in our census, pipeline and AM:PM database services, or in news articles about the industry.
- To analyze and report on the results of surveys or other research methods.
- To comply with our legal and contractual obligations, to resolve disputes, and to enforce agreements
- To undertake research on our own behalf and for a variety of clients. We and our client look forward to hearing what you have to say, learning more about you and understanding your behaviour and attitudes relating to our research topics. Gathering this information helps us and our clients, among other things, to improve products and services and to inform business decision making.

You may object to our use of your information for any of these purposes and you may ask that we cease such use at any time by contacting us at info@fleetintel.com. Please note that if we fulfill your request we may no longer be able to communicate with you or to provide you with the data services you or your company has been receiving from us.

With Whom Do We Share Your Personal Information? How Long Do We Keep it?

If your contact information is included in our Fleet Intel databases, it will be shared with those customers who subscribe to our services that provide access to those databases in an anonymized fashion.

We also contract with third party data processors to help us store, catalog and/or process your personal and payment/credit card information for our sales, service and marketing

activities. Among these third parties are Stripe (online payment processing), MailGun (email automation), Azure (online data storage). We require all third party data processors to keep confidential all information that we disclose to them, including personal information, and to only use such information for the purpose for which it was disclosed. Please let us know if you would like more information about how we work with these companies.

In all research FLEET INTEL undertakes, unless agreed otherwise, the identity of all respondents will remain confidential; responses will not be identifiable when passed to the client.

We may provide information to regulatory authorities and law enforcement officials in accordance with applicable law or when we otherwise believe in good faith that the law requires it. There may be instances when we may access or disclose your information in order to protect or defend the legal rights or property of FLEET INTEL or their employees and agents, to protect the safety and security of users, and to protect against fraud.

FLEET INTEL may sell, transfer or otherwise share some or all of its assets in connection with a merger, reorganization or sale of assets, or in the event of bankruptcy, without your permission. In such an event, personal information may be one of the assets transferred.

We will not share your information with any other party, for any reason, unless otherwise disclosed at the point of collection. If that occurs, you will have the opportunity to refuse to give us consent or to withdraw your consent if previously given.

We retain your personal information for as long as needed to provide you or your company with our services. We also retain and use this information as necessary to comply with legal obligations, resolve disputes, and enforce agreements. If you are a participant in a survey or other research method, we retain your personal information for a reasonable time after the project is completed so that, if needed, we can verify the basis for the survey results.

You May Access Your Information, Correct It And Delete It.

We are dedicated to providing reasonable access to individuals who wish to review the personal information we have retained so that they may correct any inaccuracies it may contain or opt to delete the information.

If you wish to see the information about you that we have in our possession, if you wish to correct this information or if you wish to have it deleted in its entirety from our systems, please email us at info@fleetintel.com.

While we will respond to your request as quickly as possible, please allow us no more than 30 days for any personal information about you to be accessed, extracted, modified or deleted from our servers, and those of our third party vendors.

We will certainly respect and fulfill your request to have your information removed from our system. However, please note that in certain cases (such as where you are on a distribution list or identified as the contact person for a hotel that is participating with us) such removal may result in you no longer having access to FLEET INTEL reports and data, being able to take part in ongoing research in which you have previously indicated you wish to be a participant, or hearing about new or updated FLEET INTEL products, services and events. Likewise such removal may result in you no longer being able to take part in ongoing research in which you have previously indicated you wish to be a participant. Also, if you are the main contact for your company, or are the person identified to receive invoices on behalf of your company, we will first need for you to identify the person who will be your replacement. We will assume that you have the authority to provide us with that person's contact information.

Also, please bear in mind that, even if we delete your information, it may still persist on back-up tapes and archival documents or electronic media on which other business critical information is stored and which FLEET INTEL must retain for legal, tax, or regulatory reasons, or for legitimate and lawful business purposes. Access to such archival information is limited to only authorized personnel who are under an obligation to maintain its confidentiality.

Other Choices About Your Information

In addition to the options described above, the following mechanisms are available that allow you to control information that is collected about you and your use of our websites:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of our websites may then be inaccessible or not function properly.
- **Google Analytics Opt-out Option.** If you do not want your information collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. To opt-out of Google Analytics, visit the Google Analytics opt-out page (located at <https://tools.google.com/dlpage/gaoptout>) and install the add-on for your browser. For more details, visit the "Google Analytics opt-out browser add-on" page (located at <https://support.google.com/analytics/answer/181881?hl=en>).

How Do We Protect Your Information?

FLEET INTEL takes appropriate administrative, organizational, physical, and technical measures (collectively "Security Measures") to protect your personal information from loss, misuse, unauthorized access or disclosure, alteration and destruction. We follow generally

accepted standards when implementing and maintaining such Security Measures, including, but not limited to, TLS/SSL for data in transit, limiting unnecessary access, using at rest and in transit encryption, using services such as a 24x7 Security Operations Center (SOC), monitoring for unauthorized access attempts, using secure servers operated by datacentres that hold ISO27001 accreditation, filtering access attempts and mitigating activities by bad actors. These Security Measures are periodically reviewed and, if necessary, updated to ensure they meet current generally accepted standards. Furthermore, only authorized personnel have access to personally identifiable information. Such employees are required to maintain the confidentiality of this personal data. This policy also applies to any and all agents and third party data processors that may receive such information from us. Website visitors who provide personal information to us through our websites should be aware, however, that our websites may contain links to third party sites that are not governed by this Privacy Policy or any other privacy statement. IT specialists are able to operate from disaster recovery sites to provide a continual service to clients should their or our offices be inaccessible or office communications be rendered inoperable.

No method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee the absolute security of information that is transmitted to us electronically. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide. If you have questions about the security of your personal information, our websites or other systems on which your personal information may be transmitted, please do not hesitate to contact us at info@fleetintel.com.

Third Party Websites

This Privacy Policy does not apply to any third party websites or to other companies or persons that may access our websites, with or without our permission. Our websites may contain links to, and media and other content from, other sites. In addition, such third-party media and content may also contain external links. Because of the dynamic media capabilities of our websites, it may not be clear to you which links are embedded in our websites and which are embedded in third-party media and/or content. FLEET INTEL cannot and does not guarantee the privacy policies and practices of any third party. We do not control, operate, or endorse any information, products, or services of any third-party websites that may be reached through links from our websites.

The use of any personal information provided by you to, or automatically collected from, a third party will be governed by that party's privacy policy. If you are unsure whether a website is controlled, affiliated, or managed by FleetIntel, you should review the privacy policy at each linked website to determine how that site treats your personal information.

Protecting Children

Our websites are not intended for children under 13 years of age. FLEET INTEL does not knowingly collect personal information from children under 13. If you are under 13, do not use our websites or provide any information about yourself to us, including your name, postal address, telephone number, email address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at info@fleetintel.com.

Your California Privacy Rights

California Consumer Privacy Act (CCPA)

We collect personal information as defined by the CCPA, which is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include de-identified or aggregate information, publicly-available information that is lawfully made available from federal, state, or local government records, and information covered by certain sector-specific privacy laws.

In the 12 months preceding the date this Privacy Policy was last updated, FLEET INTEL collected the following categories of personal information:

- Identifiers (e.g., name, postal address, online identifier, internet protocol address, email address, or other similar identifiers)
- Categories of personal information described in California Civil Code §1798.80(e) (e.g.name, signature, telephone number, credit card number, debit card number,)
- Internet or other electronic network activity information (e.g., pages visited)
- Professional or employment-related information (e.g., occupation, household income)

FLEET INTEL collects personal information from the following sources:

- Directly and indirectly from you
- Others in your organization
- Data analytics providers

FLEET INTEL collected the following categories of personal information for the following business purposes, and in some cases, disclosed such personal information with third parties for a business purpose:

Personal Information:

- Identifiers

Purpose:

- To register you as a user or event attendee
- For invoicing purposes and for credit card payment processing
- To contact you about your subscription or contract renewal
- To contact you about your data
- To contact you to inquire whether you wish to participate in a survey or other research method
- To notify you about products, services, and events that may be of interest to you
- To notify you about any updates or maintenance to our websites
- To notify you about any corrections or delays in our data reporting
- For direct marketing and advertising purposes
- For website analytics to make sure that our websites are serving as a useful, effective information source for you
- To analyze and report on the results of surveys or other research method
- To comply with our legal and contractual obligations, to resolve disputes, and to enforce agreements
- To undertake research on our own behalf and for a variety of clients
- Short-term transient use

Personal Information:

- Categories of personal information described in California Civil Code §1798.80(e)

Purpose:

- To register you as a user or event attendee

- For invoicing purposes and for credit card payment processing
- To contact you about your order or contract renewal

Personal Information:

- Internet or other electronic network activity information

Purpose:

- For website analytics to make sure that our websites are serving as a useful, effective information source for you
- To undertake research on our own behalf

Personal Information:

- Professional or employment-related information

Purpose:

- To register you as a user or event attendee
- To notify you about products, services, and events that may be of interest to you in your work
- To undertake research on our own behalf and for a variety of clients

California residents have the right to: (1) request that FLEET INTEL disclose what personal information we collect, use, disclose, and sell; (2) request deletion of personal information; (3) opt-out of the sale of personal information; and (4) not receive discriminatory treatment by FLEET INTEL for exercising these rights.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your Personal Information. To make a request on your behalf, an authorized

agent may contact us by email with proof of your written and signed permission to do so. Note that FLEET INTEL may also require you to verify your identity and confirm that you gave permission.

Requests to Know

You have the right to request that we disclose the following information:

- Specific pieces of personal information FLEET INTEL has collected about you;
- Categories of personal information FLEET INTEL has collected about you, disclosed about you for a business purpose, or sold;
- Categories of sources from which the personal information is collected;
- Categories of third parties with whom FLEET INTEL shares or to whom FLEET INTEL sells personal information; and
- The business or commercial purpose for collecting and selling personal information.

To make such a request, please contact us by email. Please provide your first and last name and the email address(s) at which have received communications from us. That will assist us in locating you in our systems.

Requests to Delete

You have the right to request that we delete personal information about you that we collected and maintain, subject to certain exceptions. To make such a request, please contact us by email at info@fleetintel.com. Please provide your first and last name and the email address(s) at which have received communications from us. That will assist us in locating you in our systems. Once we verify your request, we will delete and direct our service providers to delete your personal information, unless an exception applies.

FLEET INTEL “Shine the Light”

California Civil Code Section § 1798.83 permits users of our websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at info@fleetintel.com. Please note, however, that FLEET INTEL does not disclose personal information to third parties for their direct marketing purposes unless we have previously obtained your consent.

Future Changes to Our Privacy Policy

This Privacy Policy was last revised in June 2021. The law and technology is always changing, as is how we interact with you. Therefore, FLEET INTEL may need to modify or amend this privacy statement at any time. If so, we will notify you. Any changes to this Privacy Policy will be in effect as of the “Last Updated” date referenced in this Privacy Policy.

For Complaints or Further Inquiries: If you have any other questions about our privacy policy and practices or if you have a complaint about how your data has been handled by FLEET INTEL, please contact us at:

- By email: info@fleetintel.com