



THE HOSPITALITY PROCESSES, BY THEIR COMMON NATURE, ARE INFORMATION SHARING ENVIRONMENT TO MAKE YOUR STAY MORE ENJOYABLE. YOU UNDERSTAND THAT ANY AND ALL INFORMATION THAT YOU PROVIDE TO NEVOTEK MAY BE SHARED WITH PROPERTIES AND AGENTS AND OTHER INDIVIDUALS AND ENTITIES INVOLVED IN THE HOSPITALITY PROCESSES. IN ADDITION, AGGREGATED ANONYMOUS INFORMATION MAY BE SHARED WITH OTHERS IN ACCORDANCE WITH THESE TERMS AND CONDITIONS. THEREFORE, YOU SHOULD NOT PROVIDE ANY INFORMATION WHATSOEVER THAT YOU ARE NOT WILLING TO SHARE AS DESCRIBED. IF YOU ARE NOT AGREEABLE THE BELOW POLICY, DO NOT USE OUR SERVICES OR THIS WEB SITE.

NEVOTEK Privacy Policy

This Privacy Policy was last updated on June 13, 2018

We value our customers and their privacy. Our Privacy Policy is designed to assist you in understanding how Nevotek collects, uses, and protects the personal information you provide us via our web site. It also describes the choices available to you regarding Nevotek's use of your personal information. This Privacy Policy will be updated periodically.

Scope

This Privacy Policy applies to data collected by Nevotek through the web sites that display (or link to) these terms. It does not apply to those Nevotek web sites that do not display (or link to) this policy or third-party web sites that you may access from our web sites. We also do not control the data use practices of employers or others who may access your information from our web sites. We encourage you to review the privacy policies of those other web sites so that you can understand how they collect, use and share your information.

Nevotek complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Nevotek has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit www.privacyshield.gov Nevotek is subject to the investigatory and enforcement powers of the Federal Trade Commission.

Information Collection

When you visit our web sites you may provide us with two types of information: personal information you knowingly choose to disclose that is collected on an individual basis and web site use information collected on an aggregate or anonymous basis as you and others browse our web site. If you choose to correspond with us through e-mail, we may retain the content of your e-mail message together with your e-mail address and our responses.

Personal information is information that can be reasonably used to identify you or any other individual to whom the information may relate personally. We do not collect personal information unless you or your prospective employer choose to provide it to us.

Nevotek collects personal information when you:

- enroll in our services;
- request support for our services;
- request information or materials;
- participate in surveys and evaluations;
- participate in promotions, contests or giveaways;
- submit questions or comments to us.



The types of personal information we collect may include (but are not limited to):

- your first and last name;
- your title and your company's name;
- your home, billing, or other physical address (including street name, name of a city or town, state/province);
- e-mail address;
- your telephone number;
- any other identifier that permits Nevotek (or those parties you authorize) to make physical or online contact with you;
- any information that Nevotek collects online from you and maintains in association with your account, such as:
 - your Nevotek username,
 - your Nevotek password,
 - your billing information.

Nevotek uses the personal information you provide to:

- create and maintain your accounts;
- process, fulfill, and follow-up on your orders;
- register your services;
- answer your questions;
- register you in programs (per your request);
- send you information;
- send you surveys.

We also use this personal information to provide you with information related to your account and the services you purchased from us, to better understand your needs and interests, to improve our service, and to personalize communications.

Information Sharing

Nevotek may disclose your personal information to third parties under any of the following circumstances:

- To enable third parties to see your personal information and contact you through the authorized use of our services in the hospitality processes;
- As may be required to fulfill orders, to conduct billing/credit card processing, to provide our services, and for e-mail housing (as a consequence of uses described in this policy);
- As required by law (such as responding to a valid subpoena, warrant, audit, or agency action, or to prevent fraud);
- For research activities, including the production of statistical reports (such aggregated information is used to describe our services to current and prospective partners and other third parties, and is not used to contact the subjects of the report);
- In the context of a business transaction, such as a merger, acquisition, consolidation, or divestiture (pursuant to a pledge of confidentiality under which the recipient agrees to use the information for no purpose other than carrying out the transaction).

Because Nevotek is a United States corporation and information collected on our web site is stored in whole or in part in the United States, your information may be subject to U.S. law. Information that you post in public areas of our web sites will be accessed, used and stored by others around the world, including those in countries that might not have legislation that guarantees adequate protection of personal information as defined by your country of residence.



While Nevotek takes measures to safeguard your information from unauthorized access or inappropriate use by third parties, Nevotek does not control these third parties and we are not responsible for their use of information that you post or otherwise make available in public areas of the web site.

We share aggregated anonymous information about you with Nevotek' clients, partners, other web site visitors and other third parties. We may also aggregate data on an anonymous basis with respect to preferences or other information relevant to the hospitality processes. Such aggregated data does not identify users individually, and may be made available to hospitality management or hospitality community members.

We may supply technology, hosting, and related services to other companies in order to power hospitality areas on their respective web sites (referred to as "Services Sites"). Personal and/or demographic information supplied by you via the Services Sites becomes part of the Nevotek database, but it is not accessible by anyone other than you, Nevotek and the company hosting the career site unless you have consented to sharing such information with other parties. If you attempt to register with Nevotek after registering with a Web site, Nevotek will recognize your information and you will be able to use the information you provided to the Services Site in your Nevotek account registration.

Information gathered on a page in a Services web site area or on a co-branded web site may be retained by both Nevotek and the other company. In that instance, the use of such information by the other company will be subject to the privacy policy of that company and Nevotek is not responsible for that company's use of your personal information.

Additionally, if you apply for a position through a Services web site or a co-branded web site, you may be asked to provide information on your age, gender or race where permitted by law. You should understand that this information should only be used by employers in accordance with applicable law. However, Nevotek is not responsible for the actions of such employers. All such information provided will be kept separate by Nevotek from your expression of interest in any job opportunity. Providing this information is strictly voluntary and you will not be subject to any adverse action or treatment from Nevotek if you choose not to provide this information.

Pursuant to the Privacy Shield, Nevotek is liable for onward transfers to third parties of personal data of EU or Swiss individuals.

Opting Out

We may enter into strategic marketing alliances or partnerships with third parties who will be given access to personal information including your name, address, telephone number and e-mail only if you OPT IN to receive such communications. In connection with strategic marketing alliances or partnerships, we will retain all ownership rights to the information, and we will not share information regarding your social security number or other personal financial data.

Nevotek makes every effort to provide you with the ability to opt-in and opt-out of receiving communications from us and/or our partners. We may send you e-mail about your account, about the services you have purchased, to remind you about services that are available, or in response to your questions. We may also send you e-mail with information and/or special offers about products and services that may be of interest to you, unless you indicate that you do not want to receive them. In addition, with your consent, our business partners may send you such information. You may let us know whether or not you would like to receive information, special offers, and promotional materials from us or our business partners. Please note that if you choose not to accept promotional e-mails, you may not receive special offers that may be of value to you.



We will provide you with the opportunity to opt-out of any of our direct marketing communications at any time. All promotional e-mail sent from Nevotek will contain a provision allowing you the option to decline receiving future promotional e-mail. You may unsubscribe to an e-mail communication by contacting us sales@nevotek.com and requesting that you be unsubscribed from that specific communication.

Use of Cookies

We use cookies on our web site. A cookie is a small text file which our web site sends to your computer to allow our web site to store information which uniquely identifies our users and which allows us to improve the quality of our service. Our web site's cookies do not collect or store personal information. Rather, the cookie stores a token that uniquely identifies a particular user at a particular time. That token is then linked to the user information in our secured databases.

Cookies allow us to (i) manage, present and keep track of temporary information, such as data you upload onto our web site for use with our services; (ii) register you as a member on our web site or in other various programs associated with our web site; (iii) remember you when you login to the places on our web site that require you to be a member of our web site; (iv) help us understand the size of our audience and traffic patterns; (v) collect and record information about what you viewed on our web site; and (vi) deliver specific information to you based on to your interests.

When you access our web site, we automatically collect certain non-personal information through the use of web beacons and log files. Such information may include your IP address, browser type, the date, time and duration of your access and usage of our web site and whether you opened emails you received from us.

This information is collected for visits to the web site and then analyzed in the aggregate. This information is useful for, among other things, tracking the performance of our online advertising, such as online banner ads, and determining where to place future advertising on other websites.

If you are uncomfortable with the collection of such information through the use of cookies or web beacons, we recommend disabling these features through your browser preferences. You can configure your browser to refuse all cookies or to display a message when a cookie is being sent. Your browser documentation should provide specific procedures for disabling cookies. Please be aware that if you configure your browser in this way, it will limit the performance of our web site and some of the web site's features and functionality may not be available to you.

Safeguarding Your Information

We implement a variety of administrative, managerial and technical security measures to help protect your personal information. Only authorized employees and individuals and entities involved in the hospitality processes have access to stored information. We strive to safeguard information according to established security standards and procedures and we assess new technology for protecting information. Our employees are trained to understand and comply with these information principles. We will not sell, trade or lease collected information that personally identifies you to third parties without your consent.

If a password is used to help protect your accounts and personal information, it is your responsibility to keep your password confidential. Do not share this information with anyone.

Children

Nevotek' services are expressly created for adults aged 18 years and older. We do not knowingly collect personal information from persons under 13 years old. If we learn that we have collected personal information for a person under 13 years old, we will take reasonable steps to delete such information as soon as possible.

**Policy Updates**

This Privacy Policy may be updated from time to time. All changes to this Privacy Policy will be posted on our web site and will be identified at the top of the page by its effective date. It is your responsibility to keep abreast of these modifications.

Right to Access

You have the right to access your personal data collected by Nevotek as specified in the Privacy Shield and are able to correct, amend, or delete that information where it is inaccurate, or has been processed in violation of the Principles, except where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.

Dispute Resolution

In compliance with the Privacy Shield Principles, Nevotek commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Nevotek at: legal@nevotek.com.

Nevotek has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the hospitality services relationship.

You have the possibility, under certain conditions, to invoke binding arbitration when other dispute resolution procedures have been exhausted.

Contact Us

If you have concerns about your privacy in connection with your use of our web site, our services, or any general questions related thereto, please tell us by emailing us at info@nevotek.com. We will make every reasonable effort to address your concerns.

Thank you for supporting web sites and services such as ours, which take your privacy seriously by implementing written privacy policies, such as this.