Imperial River Company Website Privacy Policy – 2018

Website Privacy Policy Overview

At Imperial River Company, we value your privacy and believe you have a right to know what data we collect, for what purposes, and how the information is typically used and if or when it is shared with third parties. We also recognize your right to manage permissions regarding your personal information, including the option to have your information deleted from our records.

This policy is meant for, and directed towards, visitors to the deschutesriver.com website, anyone who submits the inquiry form on our website.

What We Collect and How It's Used

Non-Personally Identifiable Information (Cookies): We use cookies on our website to track non-personally-identifiable information regarding visitors to our site, including (but not limited to) user location, device type, pages visited, referral sources, and basic behavior on our site, including (but not limited to) time on page, bounce rate, number of sessions, and pages per session. Our cookies also collect information on demographics such as age, gender, interest, or affinity categories. Usage of a cookie is in no way linked to any personally identifiable information on our site and we do not/will not identify users or facilitate the merging of personally identifiable information with non-personally identifiable information collected through any Google advertising product.

To delete cookies or instruct your web browser to delete or refuse cookies, you can visit the help pages of your web browser. You may also choose to use the Google opt-out feature, found here.

Personally Identifiable Information (Includes the following):

- o Name
- o Email address
- o Mailing Address
- Phone Number

We only collect this information though the normal course of business via our on-line contact request form and reservations system vendor. We use this information to respond to requests for information, book services and room stays, and provide customer service.

We have adopted and follow a strict process for ensuring your personal information is safeguarded and secure within our office systems. For information regarding our internal information security processes and policies, please contact the data security team member listed under the "Contact" section of this policy.

Third-party information-sharing:

We do not sell or rent customer lists or personally-identifiable information to any third parties. We will only share your information with third parties outside of our company, including our reservations system provider and providers of contracted products and services, in order to process booking requests, provide information or offers, or provide customer service per your request.

ResNexus

Our property uses ResNexus to provide online reservation services.

Privacy

ResNexus respects your privacy and is committed to protecting it. Your personal information is collected and stored to facilitate online reservations with our property. Basic information concerning your visit to this site is used by ResNexus to improve its service. Your data is never shared with unauthorized outside parties or sold.

ResNexus has complied with the foundation principles of GDPR from at least 2010 on and is proud to be GDPR compliant with regards to breach notifications, right to access, right to be forgotten, data portability, privacy by design, and data protection officers. For GDPR inquiries please contact our data protection officer at 385.218.2637.

Security

ResNexus uses industry-standard encryption to protect your personal and payment information during and after your reservation. After your reservation is complete, the system removes your credit card information to prevent theft or disclosure. ResNexus meets or exceeds rigorous industry standards for protecting credit card information and is PCI compliant. This PCI compliance has been verified by an external auditor.

Please note that our website may contain links to other websites and social media platforms not managed or controlled by Imperial River Company, therefore we cannot verify the security of these external sites.

Website Security Measures

To protect your information on-line, we have implemented the following security measures:

- <u>Website SSL certificate</u> which enables the https protocol and allows secure connections from a web server to a browser.
- <u>Data Security Policy</u> which outlines the policies and processes within our organization for collecting, storing, and handling personally-identifiable information.

GDPR Compliance

The <u>General Data Protection Regulation (GDPR)</u> took effect on May 25, 2018. This regulation standardizes data privacy laws across the European Union (EU). You are entitled to exercise GDPR rights if you're an EU citizen, but we are also extending the same protections to our website visitors world-wide.

Breach Notification

In the event of a data breach where personally-identifiable information is disclosed to parties outside of our organization and without consent, we will notify all users that are and/or may be involved within 72 hours of our discovery of the breach. Notification will occur via email advising the nature of the breach, what information was or may have been disclosed, and what actions we are taking to mitigate damages and repair the situation.

Right to Access

Under the GDPR, you have a right to access the information we collect, in electronic form. To receive a copy of your information, please send a request via email, originating from the email address we have on-file, to the to the data security representative listed below. Kindly include your name, email address, phone number, and a brief message requesting a report of your personally-identifiable information.

Right to Be Forgotten

To have all of your personally-identifiable information permanently removed from our records, please send an email request to the data security representative listed below, including your name, email address, phone number, and a brief message requesting removal of your personal information from our records.

Contact

For all inquiries and requests relating to data security and website privacy, including requests under GDPR for access and to be forgotten, please contact our data security representative:

Rob Miles

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