

PRIVACY POLICY

Updated May 22nd, 2018

Benchmark, a Global Hospitality Company (“Benchmark”) and its affiliated companies, including Benchmark Resorts & Hotels, owns and/or operates various properties throughout the United States and the Caribbean (“Properties”), as listed at <https://www.benchmarkglobalhospitality.com/> (“Site”). Throughout this Privacy Policy, “Sites” refers to the Site and those other websites that Benchmark owns or operates that are accessible from the Site. Under this Privacy Policy, Benchmark and its affiliates are referred to as “Benchmark” or “we, us, and/or our” and “Property Owners” refers to the owners of the Properties that Benchmark operates or manages. Except where otherwise provided, other capitalized terms have the meanings set forth in the Terms of Use at http://www.benchmarkglobalhospitality.com/Benchmark_May_2018_Privacy_Policy (“Terms”).

Purpose

This policy (“Privacy Policy”) describes, among other things:

- The Personal Information (as defined below) we collect about you
- How we use the Personal Information we collect
- The categories of third parties with whom we share Personal Information about you
- Your right to review and correct Personal Information we have collected about you
- What we do to protect Personal Information we have collected about you
- Your right to opt-out of commercial email messages
- How Personal Information about you may be shared through blogs, testimonials and your participation in our promotions
- How we interact with linked sites
- Specific terms applicable to California residents
- Our right to change the terms of this Privacy Policy

This Privacy Policy also outlines how we handle Personal Information we collect from residents of the European Union, including the purpose and legal basis for collecting that information, how long we retain it, and your right to object to the collection of the information. Together with the Terms, this Privacy Policy is a legally binding agreement between you and Benchmark. By accessing or using the Sites or by registering for a User Account (as defined in the Terms), purchasing or subscribing to any Benchmark Services, or making a reservation at one of the Properties, you consent to the Terms and this Privacy Policy, including our collection, use, and disclosure of your Personal Information as described below.

Please read this Privacy Policy carefully.

Scope

This Privacy Policy applies only to Personal Information. It does not cover data we collect that cannot be used to identify an individual or to pseudonymous data. Nor does it include encoded or anonymized information or aggregated data which we collect or create about a group or category of services, features or users which does not contain personally identifying information. We reserve the right to share aggregate, encoded, or anonymized information with potential partners or other third parties without restriction.

What is personal information?

For the purposes of this Privacy Policy, Personal Information is your first and last name, your e-mail address, your home or other physical address, including a street name and name of a city or town, your telephone number, your social security number, any payment or financial information, or any other identifier that permits Benchmark to contact a natural human person, like you, and/or any information that we maintain that could be used to identify you in combination with any of the identifying information described above.

Information we collect

We collect Personal Information you provide to us and when you use the Sites and/or our Services. We collect Personal Information in order to improve our services, to deliver services and perform obligations under contracts we have with you, to comply with our own legal obligations, and for other purposes as described below.

Information you give us

We receive and store any Personal Information you post to the Sites or provide to us when you set up a User Account, sign up for our newsletters or promotions, purchase Services, or make a reservation at one of the Properties. For example, if you make a reservation at one of the Properties, we will ask you for information such as name, address, telephone number, e-mail address, credit card number, and room preference to process your reservation. We may use your e-mail address to send a confirmation and, if necessary, may use the other information to contact you for help to process the reservation. As indicated below, we may also use your e-mail address to notify you about special offers and promotions. You can choose not to provide such Personal Information, in which case you will not be able to access or use portions of the Sites or some of their features.

Automated collection

We automatically receive and store certain types of information when you visit the Sites, such as the name of the domain and host from which you access the Internet; the IP address of the computer you are using and the browser and operating system you are using; the date and time you access the Sites; the Internet address of the website from which you linked to the Sites; any search terms you used to find the Sites; the device identifiers and mobile and network information, and your actions on the Sites. This information will be treated as Personal Information if we combine or link it to any of the identifying information above. Otherwise, this information constitutes aggregate information.

Credit card information

We will require your credit card information in order process purchases and reservations. Credit card data is transferred over a Secured Sockets Layer (SSL) line if you are using a SSL enabled browser such as Microsoft Internet Explorer, Firefox, Safari, or Google Chrome. We also use SSL on other select pages where you enter Personal Information. This ensures that your Personal Information is encrypted as it travels over the Internet. This secure mode is enabled before any such information is transmitted from your computer. You will know you are in secure mode when the padlock or key icon in the lower right-hand or left-hand corner of the computer screen appears in the locked position. In addition, when accessing a secure server, the first characters of the site address will change from http to https. After information reaches us it is stored on a secure server that resides behind firewalls designed to block unauthorized access from outside Benchmark.

Log data

Our web servers may collect “log data.” Log data provides aggregate information about the number of visits to different pages on the Sites. We use log data for troubleshooting purposes and to track which pages people visit in order to improve the Sites. We do not link log data collected to Personal Information. Third-party vendors may also collect aggregate log data independently from us.

Cookies

We automatically receive and store certain types of information when you visit the Sites through the use of cookies, web beacons, or similar programs to collect the information described above. Cookies are strings of text that a website may store on your computer. Cookies enable the Sites to keep track of your preferences and activities when you use or visit the Sites. The Sites create session cookies for each visit in order to facilitate your visit. The session cookie expires at the end of the session. We may also use “persistent” cookies, which remain on your device for much longer. Cookies do not corrupt or damage your computer or computer files. We use cookies for authentication, to remember your settings, to keep track of your activity during a visit to the Site, to conduct usability tests, to improve Site performance, and to implement certain features of the Site. You can control the use of cookies at the individual browser level. If you reject cookies, you may still use our Sites, but your ability to use some features or areas of our Sites may be limited. If you do not wish to receive these cookies, you may set your browser to reject the cookies (consult the instructions for your particular browser on how to do this), although doing so may affect your ability to perform certain transactions on the Sites.

Web beacons

Some of the pages on the Sites may contain electronic images known as web beacons that allow use to count the number of users who have visited those pages. These collect only limited information such as a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. These web beacons do not carry any personal Information and you cannot opt-out or refuse them. However, where they operate with cookies, you can render them ineffective by opting out of cookies or changing the cookie setting in your browser.

Marketing emails

We use a third party service providers to send our marketing e-mails. There are no cookies in the e-mail. However, they contain e-tags which permits you to share the mail via social sites to which you subscribe. In addition, when you click on a link to the Sites included in the e-mail, a persistent cookie is placed on your computer. This cookie is used to measure the effectiveness of our e-mail marketing efforts, better understand how our users navigate through the Sites, and enhance user experience. To that end, we collect a variety of information about how you interact with our marketing efforts, including how many times the email is opened and/or clicked, the browser type used, operating system, user email program, etc. The cookie set by our service providers will remain on your hard drive 30 days after the last time you clicked on the coded link in the e-mail, or until you delete it.

In addition, the third parties that assist with our marketing e-mails may use pixel tags that help us send the e-mail in a format you can read, to allow us to know which e-mails you act upon and to better target the content of future e-mails. We also use these tags to track the aggregate number of e-mails read and whether any of the links in the e-mail were accessed.

Advertisements

We use third party service providers to serve and host our advertisements. These third parties use persistent cookies to track the number of times our site is accessed and whether the site was accessed from the advertisement. The cookies generated from the advertisements do not contain Personal Information and may remain on your hard drive three or more years unless you delete them. If you do not want Personal Information about you used for this purpose, you may opt-out by following the procedure described below. Note, however, that where we use a third party to provide advertising, email marketing or similar services, each such third party will have its own opt-out process, which it will manage and control. You will need to follow those procedures to opt-out of the services they provide.

Personal profiles

We collect and maintain Personal Information about you to create a personal profile containing hotel stay preference and other information that you voluntarily provide to us when you create an account with us. This profile may also include information we have obtained from other sources. Examples of the types of information we may collect for this purpose include (i) high vs. low floor, smoking vs. non-smoking room, beverage and pillow type preferences; (ii) whether you participate in travel rewards programs; (iii) email communications with you; and (iv) responses to customer service surveys. Creating and completing a member profile allows you to make reservations more easily and also allows us to enhance your hotel stay experiences. We will share your preference profile with the Property when you book a stay.

Use of personal information

We may use the Personal Information provided or obtained through the Sites to:

- Process reservations;
- Perform research and analysis about your use of, or interest in, our products, services, or content;

- Communicate with you by email, regular mail, telephone, or mobile devices, about products or services that may be of interest to you either from us or from other third parties;
- Develop and deliver our newsletter;
- Tailor your user experience;
- Develop and display third-party content and advertising tailored to your interests on the Sites;
- Enforce our Terms;
- Manage our business;
- Notify you of changes to our services;
- Send you information you have requested;
- Process entries to a competition or promotion;
- Carry out obligations under any contract we have with you;
- Perform functions as otherwise described to you at the time of collection;
- In connection with the creation and maintenance of your User Account; and
- In connection with the processing, fulfillment, and shipment of any products or services you purchase.

We generally store Personal Information in the United States as long as reasonably necessary to fulfill the purposes described in this Privacy Policy, as we determine is necessary for business records, and as required under applicable law. However, we may transfer your Personal Information from the United States to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our business. By providing any information to Benchmark, you consent to such transfer, storage, and processing.

Disclosure of personal information to third parties

General: We do not share the Personal Information provided or obtained through the Sites with third parties, except as described below and as otherwise specified in this Policy. We may share Personal Information as follows:

- With the third parties that perform(s) maintenance and operation of the Sites on our behalf. These parties are bound by a confidentiality agreement prohibiting the unauthorized disclosure and/or use of your Personal Information.
- With Property Owners for the purposes described in this Privacy Policy.
- With other third parties that perform services or functions on our behalf. We do not authorize such third parties to use your Personal Information for any other purposes.
- With third parties, such as social sites (including Facebook and Instagram), to which you subscribe in order for you to link to them through our site and view our content through those sites.
- As we believe is necessary to comply with applicable laws, statutes, or regulations, and/or to enforce this Privacy Policy and the Terms and to protect our rights and the rights of others.
- As required by a court or government agency or to respond to a claim by you or a third party
- As part of a transfer of our assets, for example in the event of a merger, acquisition, corporate change or, in the unlikely event of a bankruptcy, involving Benchmark.
- As you may otherwise request or agree.

Reservations: Reservations for the Properties are handled by us directly or our booking partner ("TravelClick" and "Sabre-SynXis Central Reservations"). You can also make reservations through third party services, as described in the terms and below. If you make a reservation directly with us or use the Booking Company we will collect and process Personal Information about you in order to process and manage your reservation. This information will be provided to the Property to meet your reservation request. If you cancel your reservation, the information is stored for recordkeeping purposes only and is not accessed again. After making a reservation or completing your stay at a Property, unless you tell us otherwise, the information you provide may be used by us for direct marketing of one or more of the Properties, other of our products, or the products of select, reputable third parties with whom we have a strategic marketing relationship because they offer products or services that we believe would of interest to you. We may use the services of a third party mail house for the sole purpose of mailing materials.

Affiliates:

We share much of our data, including Personal Information about you, with our affiliated entities and joint ventures when it is reasonably necessary for the purposes otherwise permitted in this Privacy Policy. This includes the owners of the Properties we manage or operate.

Service Providers:

We use third party service providers to provide specific business support services to us which may involve limited access to Personal Information. We require these companies to use the information only to provide the contracted services and prohibit them from transferring the information to another party except as needed to provide the contracted services. Examples of such services include sending emails, conducting and administering promotions, executing surveys, providing customer service, performing business analysis, and processing payments. When we employ another company to perform a function for us, we only provide them with the information that they need to perform their specific function. We are not responsible for the actions of service providers or other third parties, nor are we responsible for any additional information you provide directly to any third parties.

Business Transactions:

We may disclose your Personal Information as part of any merger, sale of company assets or acquisition, as well as in the event of an insolvency, bankruptcy or receivership. The recipient of Personal Information following such actions may have privacy policies that differ from those in this Policy. You will be notified via email and/or a prominent notice on the website, and you may opt-out of the use of your existing information in a new manner.

Special Events:

If you choose to participate in a special event (for example, a promotion, contest, or sweepstakes), we may share your Personal Information with those organizations participating in the applicable event.

Other purposes:

We may use and share Personal Information for other purposes with your consent.

Disclosure:

Upon request we will provide you with information about whether we hold, or process on behalf of a third party, any of your Personal Information. To request this information please contact us at bhi@benchmark-hospitality.com.

Other Privacy Policies:

Any third parties to whom we may disclose Personal Information may have their own privacy policies that describe how they use and disclose Personal Information. Those policies will govern use, handling, and disclosure of Personal Information once we have shared it with those third parties as described in this Policy. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties.

Children

The Sites are not directed at children, and we do not knowingly collect Personal Information directly from users under the age of 13 or from other web sites or services directed at children. Consistent with the Federal Children’s Online Privacy Protection Act of 1998 (COPPA), we will not knowingly request or collect Personal Information from any child under age 13 without obtaining the required parental consent.

Corrections and updates

If you want to view your Personal Information, or delete or modify such information that is inaccurate, you may do so by sending an email to bhi@benchmark-hospitality.com. In making modifications you must provide only truthful, complete, and accurate information. We may limit your right to make changes to Personal Information where the burden or expense of providing access would be disproportionate to the risks to your privacy or where the legitimate interests of other persons may be violated.

Please note that notwithstanding your request to change or delete Personal Information, we may be required to keep this information and not modify or delete it, or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements. When we delete any information, it will be deleted from the active database, but may remain in our archives. In some instances, however, Personal Information that you requested to be removed may be retained in certain files for a period of time in order to troubleshoot problems. In addition, some types of Personal Information may be stored indefinitely on back-up systems or within log files due to technical constraints or financial or legal requirements. Therefore, you should not always expect that all of your Personal Information will be completely removed from our databases in response to your request.

In addition to deleting Personal Information, you may choose to opt-out of receiving future newsletter, promotions or any other email communications from us by following the unsubscribe instructions included in the communications, or by contacting us via email as provided above. All promotional emails from us include an opt-out link which can be processed within 24-hours. You may also opt-out of promotions by sending us an email in response with “unsubscribe” or “opt-out” in the subject line of the

email. Opting out of promotional communications does not affect our communications with you via telephone or email related to any business we may have with you or other transactional emails.

We reserve the right to verify the identity of any person making a request to opt-out or to delete or modify incorrect Personal Information, to charge you a fee before providing access and to deny such requests, except as prohibited by law; provided, however, that we will have no liability of any kind resulting from false or erroneous requests or any change or deletion we make for any reason.

Blogs

The Site offers publicly accessible blogs and social forums where you may post photos, videos and information about yourself and your experience at the Properties. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them. To request removal of your Personal Information from our blog or social pages, contact us at bhi@benchmark-hospitality.com. In some cases, we may not be able to remove your Personal Information, in which case we will let you know if we are unable to do so and why. Alternatively, if you used a third party application to post such information, you can remove it by logging into that application and removing the information, or by contacting the appropriate party for such third party application.

Testimonials

We display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at bhi@benchmark-hospitality.com.

Storing your personal information

We will retain the Personal Information you give us or we collect for as long as you maintain your User Account or subscription to our newsletters or other content, participate in any of the social features on the Sites, enter any promotions, use any of our other Services and for a reasonable time thereafter. We will retain and use Personal Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Otherwise we will retain Personal Information for up to twenty-four (24) months and thereafter may store it in aggregate. If you would like us to delete the Personal Information you have provided to us, please contact us at bhi@benchmark-hospitality.com and we will respond in a reasonable time. Please note that some or all of this information may be required in order for you to make use of services and features available via the Sites. If you remove this information, you may no longer be able to use these features.

Social media

The Sites may include social media features, such as the Facebook Like button and widgets, such as the “Share This” button or interactive mini-programs that run on the Sites. These features may collect your IP address, which page you are visiting on the Sites, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on the Sites. Your interactions with these features are governed by the privacy policy of the company providing it.

Security

We have reasonable security measures in place to protect against loss, misuse and alteration of Personal Information under our control. When you enter Personal Information to book a reservation or set up an account, we encrypt that information using secure socket layer technology (SSL). In addition, electronically stored Personal Information is stored on a secure network with firewall protection and access to our electronic information systems requires user authentication via password or similar means. We also employ access restrictions, limiting the scope of employees who have access to Personal Information. While we strive to safeguard Personal Information, we cannot guarantee or warrant the security of any information you disclose or transmit to us and you do so at your own risk.

Third party website

The Sites may contain links to other websites. We do not control, and make no representations whatsoever regarding, such other websites or the products and services offered by or through websites accessed through links on the Sites, even those with which we may have an affiliation. If you decide to access third party websites linked through the Sites you do so at your own risk. You should carefully review the privacy policy and terms of these websites.

Reservations through third parties

In addition to making reservations for Properties directly through us and/or our Booking Company, you may make reservations for the Properties through aggregators like Booking.com, Expedia, Orbitz, or Kayak ("Aggregators"). If you use an Aggregator to book reservations at the Properties, they may have additional or different privacy policies and you are responsible for reviewing them before you make a reservation. If you use another online booking website to reserve lodging at a Property, you do so at your own risk and you should carefully review the privacy policy and terms of any such websites.

Commercial electronic message consent

By providing your email address or other contact information to us, you affirmatively and expressly consent to receiving commercial emails and marketing communications, including through social media, from Benchmark or from the applicable Property Owner and those parties that process email or other marketing communications on our behalf or on behalf of the Property Owner. Marketing communications may be sent to you in order to deliver our newsletters, to provide you with more information about Properties and available products, and to provide you with updates, special offers, and other information, including but not limited to Site updates. In some jurisdictions, data privacy laws may require us to obtain a separate consent before sending certain communications. You can always choose whether or not to receive marketing emails by contacting us as described below or following the "unsubscribe" instructions contained in the communications.

Your California privacy rights

Effective January 1, 2005, under California Civil Code Section 1798.83, if an individual who is a California resident has provided Personal Information to a business in connection with a business relationship that is primarily for personal, family, or household purposes, and if that business has within the immediately preceding calendar year disclosed such an individual's Personal Information to a third party and knows

or should have known that such third party used the information for its own direct marketing purposes, then that business is obligated to disclose in writing to such individual upon request, what Personal Information was shared and with whom it was shared.

Any request for a disclosure required under this California law should be sent to us via email at bhi@benchmark-hospitality.com or via regular mail at:

Benchmark, a Global Hospitality Company

ATTN: Legal Department

1780 Hughes Landing Blvd, Suite 400

The Woodlands, TX 77380

Please note that under this law, we are not required to respond to your request more than once in a calendar year, nor are we required to respond to any request that is not sent to the email or mailing address designated above.

International visitors

The Sites are hosted in and provided from the United States and are intended for visitors located within the United States. If you use the Sites from the European Union, Canada, or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your Personal Information to the United States for storage and processing. The United States does not have the same data protection laws as the EU, Canada, and some other regions. Also, we may transfer your data from the United States to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating our business. By providing any information, including Personal Information, you consent to the transfer of that information to the United States and the use of your Personal Information, in accordance with this Policy.

Changes to this Privacy Policy

We may modify this Privacy Policy from time to time as we deem necessary or appropriate due to changes in our business practices or changes in the law. If we decide to change this Privacy Policy we will notify you of any material changes by email or by means of a notice on the Site, prior to the changes becoming effective so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

“Do not track”

Section 22575 of the California Business & Professions Code requires website and online service operators to disclose whether they honor web browser “Do Not Track” settings. We support and honor “Do Not Track” web browser settings. If you enable Do Not Track settings in the browser you are using, we will not collect, store, or use Personal Information about websites you visit using that browser other than www.benchmarkglobalhospitality.com and our other Sites. Other parties, however, may not honor Do Not Track signals. These parties may collect Personal Information about your online activities over

time and across different web sites when you visit the Sites, for example by using cookies on our Sites. We have no access to or control over other parties' Personal Information collection practices, even those with which we may have an affiliation. You should carefully review the privacy policy and terms of any website you visit. For more information about Do Not Track, please visit www.allaboutdnt.org.

Other terms and conditions

Your access to and use of the Sites and our services are also subject to our Terms. In addition, each Property may have its own terms, including additional policies governing the collection and use of Personal Information. Your access and use of services available from each Property is also subject to the terms applicable to that Property as presented on the Site for that Property. You should carefully review the privacy policy and terms of these Property Sites.

Contact Us

If you have any questions about this Privacy Policy or our privacy practices, contact us at bhi@benchmark-hospitality.com. We will respond to your request to access within 30 days.

Terms Applicable to Data from EU Member Countries

We are based in the United States and the Properties we own or operate are located in the United States. In most cases, the Personal Information we collect is stored and used in the United States. While we do not direct our services to residents of the European Union (EU), it is possible that EU residents may access and use the Sites.

If we collect Personal Information from EU residents in a manner subject to the General Data Protection Regulation then, in addition to the above, the following terms shall also apply to our collection, use and retention of that information:

Compliance with Privacy Shield Principles:

When handling information from residents of the EU member countries, we strive to comply with the EU-U.S. Privacy Shield Framework principles (Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability) regarding the collection, use and retention of Personal Information from European Union member countries. However, our compliance with these principles may be limited (a) to the extent necessary to meet applicable national security, public interest, or law enforcement requirements; or (b) by statute, governmental regulation, or case law. If there is a conflict between the policies set forth below and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield Framework, visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov/list>.

Basis for collection

As set out above, we collect and process Personal Information for which you have given your express consent at the time of collection. For example, we collect Personal Information when you elect to

participate in one of our promotions. We also collect and process Personal Information to order improve our services, to deliver services and perform obligations under contracts we have with you, and to comply with our own legal obligations.

Sensitive data

We do not collect sensitive data, for example, biometric data, health data, or data revealing racial or ethnic origin, from visitors to the Sites.

Onward transfer

Except as otherwise provided in this Privacy Policy, we only disclose Personal Information to third parties who reasonably need to have access to it for the purpose of the transaction or activity for which it was originally collected or to provide services to or perform tasks on our behalf or under our instruction. All such third parties must agree to use such the Personal Information we provide to them only for the purposes for which we have engaged them and they must either: (a) comply with the EU-US Privacy Shield Principles or another mechanism permitted by the applicable EU & Swiss data protection law(s) for transfers and processing of Personal Information; or (b) agree to provide adequate protections for the Personal Information that are no less protective than those set out in this Privacy Policy. Where we have knowledge that an entity to whom we have provided Personal Information is using or disclosing Personal Information in a manner contrary to this Privacy Policy, we will take reasonable and appropriate steps to prevent, remediate or stop the use or disclosure.

Authorized transfer

We also may disclose Personal Information for other purposes or to other third parties when you have consented to or requested such disclosure. Please be aware that we will disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We are not liable for appropriate onward transfers of personal data to third parties.

Data processors

We may retain third parties to process or analyze personal Information we collect from the Sites. For example, a Site may be maintained or hosted by a third party service provider, a promotion may be administered by a sales promotion agency, and/or products may be fulfilled by a wholesaler. These suppliers and other third parties who provide services for us are contractually obligated not to use Personal Information about you except as we authorize.

Profiling

We may analyze Personal Information we have collected about you to create a profile of your interests and preferences so that we can contact you with information that is relevant to you. We may make use

of additional information about you when it is available from external sources to help us do this effectively. We may also use Personal Information about you to detect and reduce fraud and credit risk.

Your rights

Your rights include: (a) a right to withdraw your consent to the processing of Personal Information about you to which you have previously given consent; (b) a right to object to processing of Personal Information about you for the purpose of direct marketing; and (c) a right to have incorrect Personal Information about you corrected or removed.

If you request to have incorrect Personal Information removed, we may retain some of your Personal Information as necessary for the purposes of our legitimate business interests or in furtherance of public interests in accordance with the Privacy Shield Principles. Any Personal Information you have shared publicly with others may continue to be publicly visible on the Sites.

You also have the right to obtain a copy of the Personal Information we have about you, although we reserve the right to charge a fee for this depending on the nature and frequency of your request(s) and our cost to provide the information.

Questions and complaints

If you have questions or complaints regarding this Policy or our handling of your Personal Information, please contact bhi@benchmark-hospitality.com. We will promptly investigate and attempt to resolve complaints and disputes in a manner that complies with the principles described in this Privacy Policy. Residents of Switzerland covered by the US Swiss Safe Harbor Principles should contact us with questions at the same address.

Enforcement and disputes

In compliance with the EU-U.S. Privacy Shield and the US Swiss Safe Harbor Principles, we commit to resolve complaints about your privacy and our collection or use of your Personal Information. If you do not receive timely acknowledgement of your request or have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

In addition to the above, you may complain to your home data protection authority and can invoke binding arbitration for some residual claims not resolved by other redress mechanisms. Contact details for the EU data protection authorities can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

The Federal Trade Commission has jurisdiction over our compliance with this Privacy Policy and the EU-US Privacy Shield Framework. As a last resort, privacy complaints that remain unresolved after pursuing these and other channels may be subject to binding arbitration before the Privacy Shield Panel to be created jointly by the US Department of Commerce and the European Commission.

Effective May 22, 2018.

