



PRIVACY POLICY

Last Updated May 2018

Hacienda Sarria takes the issue of safeguarding your privacy very seriously. We at Haciendasarria.com (“Hacienda Sarria,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared.

Whenever you provide personal information, we will treat that information in accordance with this policy, current Canadian Data Protection legislation and Internet best practice. By using our website, you consent to the collection, storage and processing of your personal information by us in to the manner set out in this privacy policy.

This Privacy Policy applies to our information collection and use practices: online when you visit our website, including, without limitation, Hacienda Sarria (the “Website”); and offline when you provide information to us.

This privacy notice provides you with details of how we collect and process your personal data through your use of our site Haciendasarria.com.

By providing us with your data, you warrant to us that you are over 13 years of age.

Haciendasarria.com is the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at reservations@haciendasarria.com.

Capitalized terms not defined in this Privacy Policy shall have the meaning set forth in our Terms of Service.

Acceptance of Terms

By visiting our Website, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Service, both of which govern your use of the Website. By providing us information offline, you are also agreeing to the terms of this Privacy Policy.

The Information We Collect

In the course of operating the Website and/or interacting with you, we will collect (and/or receive) the following types of information.

Why is Personal Information Collected?

The term "Personal Information" refers to any information that can be used to identify you as an individual. It can include, among other things, your name, address, age, gender, or contact number.

We do not collect any personal information from Visitors when they use the Website unless they provide such information voluntarily, such as by registering or sending us an email or filling out an online form. All information we collect and/or receive under this section is collectively called "Personal Information."

- **To Provide Superior Customer Service to our Guests**
Personal Information is collected to assist us in making your event reservation, planning an upcoming event, and to allow us to contact you in relation to matters that arise from your visit with us. By keeping certain event related Personal Information on file, such as information regarding previous event history and itemized spending, guests of Hacienda Sarria have the ability to confirm prior transactions and reconcile statements or invoices.
- **To Keep Our Guests Informed**
We may use the Personal Information you provide to send you event invitations or newsletters regarding our venue and to advise you of promotions or to inform you of offers or other information that may be of interest to you. In order to do this, your information may be shared with a third party, for example, a customer relationship management company and/or a marketing and communications company. These companies are under contract with Hacienda Sarria and are contractually required to protect all Personal Information to which they have access. If you do not wish to receive information from Hacienda Sarria you may advise one of our team members or send an e-mail to: reservations@haciendasarria.com
- **For Marketing Research**
Finally, we may wish to contact guests or clients to conduct surveys to receive your views of our venue and service delivery. Such information may be collected by a third party under contract with us and they will be contractually required to protect your Personal Information as explained below.
- **Sensitive Data**
We do not collect any Sensitive Data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.

Where we are required to collect personal data by law, or under the terms of the contract between us and you do not provide us with that data when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us

with the requested data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at reservations@haciendasarria.com. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

We do not carry out automated decision making or any type of automated profiling.

How is Personal Information Collected?

- **From You**
Additional information about yourself that you voluntarily provide to us (e.g., via a survey), such as household income range, gender, product and service preferences, and other information that does not identify you personally.
- **From Your Activity**
Information that we automatically collect when you use the Website, including, without limitation: IP addresses, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or device; browser type and language; referring and exit pages and URLs; date and time; amount of time spent on particular pages; what sections of the Websites you visit; and similar data; and Information about your device, including the type of device; universally unique ID (“UUID”); advertising identifier (“IDFA”); MAC address; operating system and version (e.g., iOS, Android or Windows); carrier and country location; hardware and processor information (e.g., storage, chip speed, camera resolution, NFC enabled); network type (WiFi, 3G, 4G, LTE); and similar data.
- **From Cookies Information that we collect using “cookie” technology**
Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them) to help us collect other information and to enhance your experience using the Website. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies. However, if you decide not to accept cookies from us, the Website may not function properly.
- **Third-Party Analytics**
We use third-party analytics services (such as Google Analytics) to evaluate your use of the Website, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the

Website and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. By accessing and using the Website, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on Google Analytics, including how to opt out from certain data collection, please visit www.google.com/analytics. Please be advised that if you opt out of any service, you may not be able to use the full functionality of the Website.

- **From Other Sources**

We also may collect or receive information from third parties, such as Facebook, Instagram and/or other third-party social media sites.

Information Collected by or Through Third-Party Advertising Companies

We may share information about your activity on the Website with third parties for the purpose of tailoring, analyzing, managing, reporting, and optimizing advertising you see on the Website and elsewhere. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect such information for such purposes. Pixel tags enable us, and these third-party advertisers, to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which advertisement brings a user to a given site.

Accessing and Modifying Personal Information and Communication Preferences

You may manage your receipt of marketing and non-transactional communications by clicking on the "unsubscribe" link located on the bottom of any Hacienda Sarria marketing email. Customers cannot opt out of receiving transactional emails related to their account or their reservations. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

How We Use and Share the Information

We use the Personal Information, the Order Information, the Billing Information, and the Other Information (collectively, the "Information") to provide our services; to process Orders; to administer promotional programs; to maintain and improve our Website and services to you; to solicit your feedback; and to inform you about our products and services and those of our third-party marketing partners.

Communication Data that includes any communication that you send to us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

If you wish, you may also submit your e-mail address in order to be placed on a subscription list or to receive other information about our products and services. You will be placed on a subscription list only when you indicate your desire to be included. In deciding whether or not to join such lists, please note that they are only used for internal purposes and we do not sell or rent our subscription lists to anyone. In the event you choose to join one of our

subscription lists, you may ask to be removed from the list at any time. You will always have the ability to accept or decline any form of communication from Hacienda Sarria.

When Making a Reservation or Online Inquiry

You can search for information and availability at our venue without providing any Personal Information.

Visitors to haciendasarria.com who elect to make inquiries online will be required to complete an online form. When you complete a form you will be asked to provide specific Personal Information, including your name and contact information. Your transmittal of your Personal Information shall constitute your acknowledgment and agreement to the terms and conditions contained in this Privacy Policy.

How We Share Information

We keep your information confidential and we generally do not disclose it. But, please note the following clarifications and exceptions:

- Our employees and authorized independent contractors ("authorized personnel") may have access to your personally identifiable information for the purpose of helping us run our business (and not for their own, independent purposes, unless you consent to such use). Authorized personnel access and use such data in accordance with our instructions, on a "need to know" basis, and under defined confidentiality and security obligations.
- If we ever sell a Site or substantial parts of our business, we may disclose your personally identifiable information to a (prospective) buyer on the condition that such buyer agrees to comply with this Privacy Policy.
- We may share your personally identifiable information to respond to law enforcement requests, court orders or other legal process or if we believe that such disclosure is necessary to investigate, prevent or respond to illegal activities, fraud, physical threats to you or others or as otherwise required by any applicable law or regulation.
- Before we disclose your personally identifiable data to a third party for their own business purposes (such as a survey or a sweepstake), we will first obtain your consent, for example via email, click-through, an online opportunity to opt-out or otherwise.
- We freely use and disclose data in anonymous form, for example, in statistics or reports to our advertising customers and partners.

Security

We take reasonable steps to protect personally identifiable information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. But, you should keep in mind that no Internet transmission is ever completely secure or error-free. In particular, email sent to or from the Sites may not be secure.

Occasionally, we provide links to other sites for your convenience and information. These sites operate independently from our Sites and are not under our control. These sites may have their own privacy notices or terms of use, which we strongly suggest you review if you visit any linked sites. We are not responsible for the content of these sites, or for any products or services that may be offered through these sites, or any use of the linked sites.

It is important to note that any e-mail communication is not secure. This is a risk inherent in the use of e-mail. Please be aware of this when requesting information or sending forms to us by e-mail (for example, from the Contact Us section of our web site). We recommend that you do not include any confidential information (i.e. credit card information) when using e-mail. For your protection, our e-mail responses to you will not include any confidential information.

How long is my Personal Information retained?

Your Personal Information may be stored indefinitely by Hacienda Sarria as long as there is a business purpose for doing so. From time to time we may delete your Personal Information if you have not contacted us for a certain period of time.

International Privacy Laws

Hacienda Sarria is located in Canada. Please be aware that if you are visiting our site from outside the Canada that all information you provide, including any personal data, and any information that is collected, stored or otherwise processed by Hacienda Sarria will necessarily result in the transfer of information across international borders to, and from Canada. Canada may not necessarily have the data protection laws as comprehensive or protective of personal data as the country in which you reside, but our collection, storage and use of your personal data, will at all times comply with the terms of this Privacy Policy. By agreeing to this Privacy Policy and using our site, you agree to the transfer and processing of your data in the Canada in a manner consistent with the terms of this Privacy Policy.

Trademark Notice

This Website contains logos, wordmarks, images and other valuable trademarks owned and used by Hacienda Sarria. These trademarks and related proprietary property are protected from copying and simulation under national and international laws and may not be reproduced, copied or otherwise used without the express prior written permission of Hacienda Sarria.

To whom do I direct questions or concerns regarding this policy?

Questions or concerns regarding this privacy policy should be directed to Hacienda Sarria by writing to the following address:

Hacienda Sarria
Director of Operations
1254 Union Street
Kitchener, Ontario N2H 6K4
Canada