



PRIVACY POLICY

Westmont Hospitality Group: The Westmont Voice

This Privacy Statement ("Statement") applies to the Westmont Voice website located at www.thewestmontvoice.ca or www.lavoixdewestmont@whg.ca, and any other websites operated by a third party on behalf of Westmont Hospitality Group, InnVest Hotels GP Ltd., and their respective subsidiaries and affiliated companies (collectively, "Westmont," "WHG," "we," or "us").

INFORMATION WE COLLECT

As you participate in The Westmont Voice Employee Engagement ("website"), we collect certain information about you. The information we collect falls into two different categories: (1) information you give us; and (2) information we collect from you automatically when you participate in the engagement system.

INFORMATION YOU GIVE US

We collect information you give us when you participate in the engagement system. Some examples of participating in the engagement system are when you visit thewestmontvoice.ca, create a Westmont Voice account or participate in a survey. The information you give us may include your first or last name, username, password, contact information, demographics information, experiences working at Westmont Hospitality Group, interests, and any other information you choose to give us.

INFORMATION WE COLLECT WHEN YOU PARTICIPATE IN THE PANEL

When you participate in the engagement system, we may collect information about how you participate and interact. This information includes:

Device and Website Use Information – When you use a computer, tablet, smart phone or other device to access our websites, we may collect information about the device and how you use it.

Location Information – When you use a smart phone or other mobile device to access our panel or use a computer to access our website, we may collect information about your physical location.

We may combine this information with other location-based information, such as your IP address and postal code. If you want to opt out of the collection of this location information, please see the section below titled, "Your Choices."

HOW WE USE THE INFORMATION WE COLLECT

We may use the information we collect about you in a variety of ways, including:

- to perform aggregated analytics to improve the employee experience;
- to respond to your inquiries and requests for information;
- to maintain and improve our hotels;
- to detect, prevent, or investigate security breaches or fraud; and
- to maintain appropriate records for internal administrative purposes.

HOW WE SHARE THE INFORMATION WE COLLECT

We may share your information in the following circumstances:

When We Work Together – We may share the collected information between and among various Westmont entities and their respective subsidiaries and affiliated companies for proper management,

analysis and decision making, and for use by those companies for the other purposes described in this Statement.

When We Work with Service Providers – We may share your information with service providers that provide us with support services such as website hosting, email delivery, and analytics. We require the companies to refrain from collecting, using and disclosing your information except when they are performing work for us or when the disclosure of your information is required by law.

When We Work on Business Transactions – If we become involved with a merger or another situation involving the transfer of some or all of our business assets, we may share your information with business entities or people involved in the negotiation or transfer.

When Sharing Helps Us Protect Lawful Interests – We may disclose your information if we believe that the disclosure is required by law, if we believe that the disclosure is necessary to enforce our agreements or policies, or if we believe that the disclosure will help us protect the rights, property, or safety of Westmont or our customers or employees.

When the Information Does Not Identify You – We may share your information in a way that does not directly identify you. For example, we may combine information about you with information about other people and share the combined information in a way that does not link your information to you.

HOW WE MAY ALLOW OTHERS TO COLLECT YOUR INFORMATION

When you use our website or participate in the employee engagement system, we may allow third parties to collect information about you by setting their own cookies, web beacons and other similar technologies on our websites. Read more about cookies, web beacons and similar technologies. The information collected by third parties may include the type of device, your operating system, your browser, your internet service provider, your domain name, your internet protocol (IP) address, the date and time that you accessed our service, the link that referred you to our website, the web pages you requested, the date and time of those requests, and the subject of the ads you click or scroll over. We allow third parties to collect this information on our websites for the following purposes:

To Collect Information on How Our Website is Used – We allow certain service providers to use the information collected on the engagement system to help us learn about our audience and how people use our website. The companies that use this information for this purpose do not match the information to individual users. In other words, statistical information collected by third parties regarding website usage or performance is not matched or linked to you.

COOKIES AND SIMILAR TECHNOLOGIES

We and others may use a variety of technologies to collect information about your device and use of our engagement system. These technologies include session cookies:

COOKIES

Cookies are small data files that are sent from a website's server and are stored on your device's hard drive either for only the duration of your visit ("session cookies") or for a fixed period of time ("persistent cookies"). Cookies contain information that can later be read by a web server. Most web browsers automatically accept cookies, but you can change your browser settings to give you the choice to accept a cookie or reject cookies altogether. For more information about changing your browser settings, please see the section of this Statement titled, "Your Choices."

We mainly use cookies for the following purposes:

Website Functionality – Some cookies (considered "strictly necessary") are required to allow you to access and use our website. Without these cookies, our website will not work properly.

Performance Monitoring – Some cookies (considered "performance" cookies) help us analyze and estimate traffic on our website. They show us how visitors interact with our website, whether there are any errors, which pages are not used often, which pages take a long time to load, which pages users tend to visit and in what order. These cookies do not collect any information that could identify you and are only used to help us improve how our website works and understand user interests.

User Convenience– Some cookies (considered "functionality" cookies) remember information to save you the trouble of entering information every time you visit or use a particular website. For example, a cookie may remember your username to save you time when you log in to your account.

YOUR CHOICES:

COMMUNICATION CHOICES

You can opt out of participating in the engagement survey system, which will result in the suspension of your participation in the survey system and our communications with you about the Westmont Voice, by contacting us as described in the "Contact Us" section below.

INFORMATION COLLECTION CHOICES

You can also make choices about the information we collect about you:

Location Information – When you use a smart phone or other mobile device to access our websites, we may collect information about your physical location only if (a) "location services" for the mobile application is enabled; or (b) the permissions in the mobile device allow communication of this information. If you do not want us to collect your location information, you can opt out of sharing this information by changing the relevant preferences and permissions in your mobile device.

Cookies – If you want to reject cookies, you must take action to select the appropriate settings in your browser. Each browser's cookie control is a little different, but the most common browsers (Internet Explorer, Chrome, Firefox, and Safari) have a preference or option you can select so the browser notifies you if a site wants to set a cookie and typically provides an option to accept or reject the cookie before the cookie is set. If you choose to remove or reject cookies, it will affect many features on our websites. If you want to learn the correct way to modify your cookie settings, please use the Help menu in your browser. For additional information about cookies, including how to refuse cookies, please visit: www.allaboutcookies.org.

"Do Not Track" Technology – Some newer web browsers have a "Do Not Track" preference that transmits a "Do Not Track" header to the websites you visit with information indicating that you do not want your activity to be tracked. We currently do not respond to browser "Do Not Track" signals.

ACCESSING YOUR INFORMATION

Depending on where you live, you may have the right, under certain circumstances, to request access to information we hold about you. In such event, any such request must be in writing and provided to us at the email address described in the "Contact Us" section below.

CHANGING YOUR INFORMATION OR DELETING YOUR ACCOUNT

If you want to access or cancel your account on the Westmont Voice Engagement System, please contact us as described in the "Contact Us" section, below. We will make every effort to promptly respond to your request. We will retain your information for as long as your account is active or as needed to provide you services. If you ask us to delete your account, we generally retain and use your account information only as long as necessary to fulfill a business or law enforcement need.

HOW WE PROTECT YOUR INFORMATION

We protect your information using technical, physical, and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure or modification of your information and require third parties to use similar technical, physical, and administrative security measures to reduce the risk of loss, misuse, unauthorized access, disclosure or modification of your information. While we have employed security technologies and procedures to assist safeguarding your personal information, no system or network can be guaranteed to be 100% secure.

STORING AND PROCESSING YOUR INFORMATION

The information you provide us is stored and processed on servers owned by Vision Critical "VCCI." Regardless of the company or person who processes your information and where it is processed, we will take steps to protect your information in accordance with applicable data protection laws and this Statement.

USE BY MINORS

We do not intend for our websites or online panel to be used by anyone under the age of 15. If you are a parent or guardian and believe we may have collected information about a child, please contact us as described in the "Contact Us" section, below.

CHANGES TO THIS PRIVACY STATEMENT

This Statement went into effect on the date noted at the bottom of this webpage. We may update this Statement from time to time. If we make material changes, we will post the updated Statement on this page and change the date at the bottom of this webpage. We encourage you to look for updates and changes to this Statement by checking this date at the bottom of this webpage. We will notify you of any modifications to this Statement that might materially affect the way we use or disclose your personal information prior to the change becoming effective by means of a message on this website.

CONTACT US

If you decide you no longer want to participate in The Westmont Voice Employee Engagement System, you may opt-out of future surveys by sending an email to support@thewestmontvoice.ca. If you choose to opt-out of The Westmont Voice, your data already captured in the system cannot be removed.

For questions regarding The Westmont Voice Employee Engagement System, not including technical support, you may send an email to thewestmontvoicesupport@whg.com

For all Technical Support inquiries, please send an email to support@thewestmontvoice.ca

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