

Kahler Hospitality Group Privacy Notice

Effective Date: December 12, 2025

This Privacy Notice provides information about the privacy practices of Kahler Hospitality Group and its affiliates (collectively, “Kahler,” “we,” “us,” or “our”), including how we collect, use, disclose, and otherwise process personal data through any website that link to this Privacy Notice (each, a “Site” and collectively, the “Sites”) and our Wi-Fi services (together with the Sites, the “Services”). We may change this Privacy Notice from time to time. If we make changes, we will notify you by revising the “Effective Date” date at the top of this Privacy Notice.

1. PERSONAL DATA COLLECTED

Personal data means any information that is linked or reasonably linkable to an identified or identifiable person but does not include de-identified data or publicly available information. We, and our vendors, may collect personal data directly from you (such as when you book a room through the Sites, connect to our Wi-Fi services, subscribe to our email newsletter, submit a form on one of our Sites, or contact customer service), and from third-party sources such as your travel agent.

Personal Data You Provide

The personal data we collect about you may vary depending on the nature of your interactions with us. We may collect the following personal data:

- **Contact Information and Identifiers**, such as name, alias, postal address, phone number, and email address.
- **Booking Information**, such as your reservation details, codes for qualified rates, and booking dates.
- **Payment Information**, such as tokenized credit or debit card details and billing address information that our payment processor processes on our behalf.

We may create inferences about you based on the personal data above.

Personal Data Collected by Other Parties

Our vendors may disclose with us the personal data that you submit directly to them. For example, if you make a reservation and pay with a credit or debit card, you may submit personal data to one or more of our vendors that may disclose your data with us. We may combine data that we have about you with data we obtain from other parties. We may also process personal data from travel advisors and agents that facilitate bookings on our Sites.

2. COOKIES AND OTHER SIMILAR TECHNOLOGIES

We, and our vendors, may use cookies, pixels, and other similar tracking technologies (collectively, “cookies”) to automatically or passively collect information when you interact with the Services. For example, these cookies may collect usage information, and IP address.

We may use these cookies for various purposes, including to provide functionality on our Services, help us route traffic between servers, understand how our Services are performing, understand how visitors use our Services, improve features and content on our Services, and for advertising purposes. For example, we may use Google Analytics to understand details about your use of our Sites. For more information on how Google Analytics uses the data it collects, visit policies.google.com/technologies/partner-sites. To opt out of Google Analytics, visit tools.google.com/dlpage/gaoptout. To adjust your Google advertising settings, visit adssettings.google.com. We may also use the Meta Pixel to collect or receive information on our Services and use that information to target and deliver ads.

Most web browsers are set to accept cookies by default, but you usually can change your browser setting to remove or reject cookies. Please note that blocking certain cookies when using the Services may prevent you from using some of the features on our Services. Additionally, by disabling cookies, you may invalidate opt outs that use cookies to recognize devices that have opted out.

3. USE OF PERSONAL DATA

We may use personal data for various purposes, such as:

- **To provide products and services you request**, including processing bookings and reservations; operating and maintaining our services; processing your payments and orders; communicating with you; and responding to your requests and questions.
- **For security and integrity**, including protecting against security threats; preventing, identifying, investigating, and responding to potential or actual fraud, illegal or malicious activities, and other risks; enforcing our policies and terms; and otherwise protecting our rights.
- **For quality, safety, and internal research**, including improving the quality of our Services; assessing the performance of the Services; tracking and responding to technical issues; and developing new or enhanced products and service offerings.

- **For advertising and marketing**, including measuring Site usage; evaluating the effectiveness of our advertising and marketing; and leveraging insights to provide personalized experiences. We may personalize your experience on the Services and across the Internet by conducting contextual or targeted advertising, including to recommend our properties to you.
- **To provide you with special offers and discounts**, including our special offer for qualified discounts.

4. DISCLOSURE OF PERSONAL DATA

We may disclose personal data we have collected to our corporate affiliates, strategic partners (including to business partners, sponsors, and in conjunction with co-branded partnerships), and our vendors, including those that help us operate our business and the Services and/or perform services on our behalf, such as analytical services, sending emails, serving advertisements, processing payments, processing bookings and reservations, customer service, and detecting and deterring fraud or other illegal activities.

We may also disclose personal data in order to facilitate the services you requested, as part of a business transaction in the event we sell or transfer all or a portion of our business assets (including negotiations of such transactions), as required or permitted by law to comply with the request of a law enforcement or regulatory agency or other legal process, where we perceive a threat or risk to individuals or property as a result of activity on our Service, and with your consent or at your direction.

5. EXTERNAL LINKS

The Services may contain links to, or features facilitated by, external parties. This Privacy Notice does not apply to the practices of companies that we do not own or control. You should refer to that party's privacy policy for information on how your personal data is collected, used, and protected.

The Sites may permit you to interact with social media platforms operated by unaffiliated parties, for example, to visit our social network page or to share content from the Sites on those platforms ("Social Features"). If you choose to "like" or share content or post information using Social Features, that information may be publicly displayed, and the party operating the other platform may receive certain information about you and your use of the Services.

6. DATA SECURITY

We strive to maintain appropriate administrative, technical, and physical safeguards designed to help protect personal data collected or received through the Services.

Although we use reasonable efforts to safeguard information, transmission via the Internet is not completely secure and we cannot guarantee the security of your information collected through the Services.

7. VISITORS LOCATED OUTSIDE OF THE UNITED STATES

Please note that Kahler is based in the United States and if you are located outside the United States, you acknowledge that your personal data will be transferred to and processed in the United States. By submitting your personal data to us, you consent to this processing. Please be aware that the data protection laws and regulations that apply to your personal data transferred to the United States may be different from the laws in your country of residence.

8. YOUR CHOICES

Unsubscribing from Email Marketing. If you no longer wish to receive marketing emails from us, please click on the unsubscribe link in the relevant email. If you opt out of marketing emails, we may still send you administrative emails, such as those related to your booking reservation.

Advertising Opt Out. Certain analytics and advertising vendors may participate in the Digital Advertising Alliance (“DAA”) AdChoices Program and may display an AdChoices Icon for Interest-based Ads that links to an opt-out tool which allows you to exercise certain choices regarding targeting. You can learn more about the DAA AdChoices Program at www.youradchoices.com.

9. ADDITIONAL INFORMATION FOR RESIDENTS OF MINNESOTA

This section supplements the other parts of our Privacy Notice and describes the rights of consumers in Minnesota under the Minnesota Consumer Data Privacy Act (MCDPA). Any terms defined in the MCDPA that are used in this section shall have the same meaning.

You can learn more about the personal data we process and the purpose for processing such personal data and the categories of recipient with whom we disclose personal data in Sections 1-4 above.

A. Sales and Targeted Advertising

Although we do not sell personal data in exchange for money, we may use, disclose, or make available the categories of personal data listed below for targeted advertising purposes or in a manner that is considered a “sale” under the MCDPA:

- Identifiers;
- Booking Information;

- Internet or other electronic network activity information from cookies;
- Geolocation data inferred from your IP address; and
- Inferences.

When we disclose or otherwise make available such information, we may do so for the purposes of receiving certain analytical and advertising benefits from social media platforms, adtech vendors, and analytics providers.

B. Privacy Rights

You may have the right to make certain requests surrounding your personal data:

Right to Access. The right to confirm whether we are processing your personal data, the categories of personal data we have processed about you, to access your personal data, and to obtain a copy of personal data you provided to us in a portable format.

Right to Delete. The right to request that we delete personal data that we have collected from or obtained about you.

Right to Correct. The right to request that we correct inaccuracies in your personal data.

Right to Opt Out. You have the right to request to opt out of the sale of your personal data or the processing of your personal data for targeted advertising. If you would like to opt out of sales and the processing of personal data for targeted advertising through cookies, please click the “Cookie Settings” link in the footer of any of our Sites. You may also opt out of targeted advertising and the sale of personal data via cookies with an opt out preference signal, such as Global Privacy Control. To process your request through an opt out preference signal, you must use a browser supporting the preference signal. If you choose to use an opt out preference signal, you will need to turn it on for each browser you use. We do not engage in practices that qualify as “profiling” which produces legal or similar significant effects under the MCDPA.

Right to Obtain List of Specific Third Parties. You have the right to obtain a list of specific third parties with whom we have disclosed personal data.

Right to Appeal. The right to appeal our decision if you are unsatisfied with our actions related to the exercise of one of your privacy rights.

To exercise your privacy rights above, please submit a request by emailing us at guestrelations@kahlerhospitalitygroup.com.

Please note that, if you submit a request, we may ask you to provide 2-3 pieces of personal data that we will match against our records to authenticate your identity. We

will only use the personal data provided to authenticate the requestor's identity. For some opt out requests, you may designate an authorized agent to make a request on your behalf.

10. Contact Us

You may contact us regarding this Privacy Notice by emailing us at optout@kahlerhospitalitygroup.com.