

ULODGING INC PRIVACY POLICY

Effective Date: June 1, 2019

This privacy policy (“**Privacy Policy**”) describes the privacy practices of Ulodging Inc and its related companies (collectively, “**Ulodging**,” “**we**,” “**us**” or “**our**”) in connection with the website, www.ulodging.com (the “**Site**”) and any other website that we own or control and which posts or links to this Privacy Policy (collectively, the “**Service**”).

We provide important information for individuals located in the European Union, European Economic Area, and United Kingdom (collectively, “**Europe**” or “**European**”) [below](#).

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WHAT WE COLLECT

Information You Give Us. Personal information about you that you give to us through the Service or otherwise includes:

- **Business and personal contact information**, such as your first and last name, postal address, email address, phone number, professional title and company name.
- **Profile information**, such as your username and password that you may set to establish an online account with us, your photograph, interests, and preferences.
- **Registration information**, such as information that may be related to a service, an account or an event you register for.
- **Feedback or correspondence**, such as information you provide when you contact us with questions, feedback, or otherwise correspond with us online.
- **Transaction information**, such as information about payments to and from you and other details of products or services you have purchased from us
- **Marketing information**, such as information such your preferences for receiving communications about our activities, events, and publications, and details about how you engage with our communications

- **Other information** that we may collect which is not specifically listed here, but which we will use in accordance with this Privacy Policy or as otherwise disclosed at the time of collection.

Information We Get From Others. We may receive personal information about you from third-party sources. For example, a business partner may share your contact information with us if you have expressed interest in learning specifically about our products or services, or the types of products or services we offer. We may obtain your personal information from other third parties, such as marketing partners and publicly available sources.

Cookies and Other Information Collected by Automated Means.

We, our service providers, and our business partners may automatically log information about you, your computer or mobile device, and activity occurring on or through the Services. The information that may be collected automatically includes your computer or mobile device operating system type and version number, manufacturer and model, device identifier (such as the Google Advertising ID or Apple ID for Advertising), browser type, screen resolution, IP address, the website you visited before browsing to our website, general location information such as city, state or geographic area; and information about your use of and actions on the Services, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and length of access. Our service providers and business partners may collect this type of information over time and across third-party websites and mobile applications.

On our webpages, this information is collected using cookies, browser web storage (also known as locally stored objects, or “LSOs”), Flash-based LSOs (also known as “Flash cookies”), web beacons, and similar technologies, and our emails may also contain web beacons.

A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. Browser web storage or LSOs, are used for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. A “web beacon,” also known as a pixel tag or clear GIF, is typically used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of our websites.

Web browsers may offer users of our websites or mobile apps the ability to disable receiving certain types of cookies; however, if cookies are disabled, some features or functionality of our websites may not function correctly. Please see the “Targeted online advertising” section for information about how to exercise choice regarding the use of browsing behavior for purposes of targeted advertising.

See our [Cookie Policy](#) for more information.

USE OF PERSONAL INFORMATION

We use your personal information for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

To operate the Service. We use your personal information to:

- provide, operate and improve the Service

- provide information about our products and services
- establish and maintain your user profile on the Service
- enable security features of the Services, such as sending you security codes via email or SMS, and remembering devices from which you have previously logged in
- communicate with you about the Service, including by sending you announcements, updates, security alerts, and support and administrative messages
- communicate with you about events or contests in which you participate
- understand your needs and interests, and personalize your experience with the Service and our communications
- provide support and maintenance for the Service
- to respond to your requests, questions and feedback

To send you marketing and promotional communications. We may send you **ULodging**-related marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications by following the opt-out or unsubscribe instructions at the bottom of any marketing email.

To comply with law. We use your personal information as we believe necessary or appropriate to comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.

For compliance, fraud prevention, and safety. We may use your personal information and disclose it to law enforcement, government authorities, and private parties as we believe necessary or appropriate to: (a) protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims); (b) enforce the terms and conditions that govern the Service; and (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity;

With your consent. In some cases we may specifically ask for your consent to collect, use or share your personal information, such as when required by law.

To create anonymous data. We may create anonymous data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Service and promote our business.

SHARING OF PERSONAL INFORMATION

We do not share personal information with third parties without your consent, except in the following circumstances or as described in this Privacy Policy:

Affiliates. We may share your personal information with our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.

Service providers. We may share your personal information with third party companies and individuals that provide services on our behalf or help us operate the Services (such as customer support, hosting, analytics, email delivery, marketing, and database management services). These third parties may use your personal information only as directed or authorized by us and in a manner consistent with this Privacy Policy, and are prohibited from using or disclosing your information for any other purpose.

For compliance, fraud prevention and safety. We may share your personal information for the compliance, fraud prevention and safety purposes [described above](#).

Business transfers. We may sell, transfer or otherwise share some or all of our business or assets, including your personal information, in connection with a business transaction (or potential

business transaction) such as a corporate divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy or dissolution. In such a case, we will make reasonable efforts to require the recipient to honor this Privacy Policy.

YOUR CHOICES

In this section, we describe the rights and choices available to all users. Users who are located within the European Union can find additional information about their rights [below](#).

Access or Update Your Information. If you have registered for an account with us, you may review and update certain personal information in your account profile by logging into the account.

Opt out of marketing communications. You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails. If you receive marketing text messages from us, you may opt out of receiving further marketing text messages from us by replying STOP to our marketing message.

Cookies & Browser Web Storage. We may allow service providers and other third parties to use cookies and similar technologies to track your browsing activity over time and across the Service and third party websites. For more details, see our [Cookie Policy](#).

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

Choosing not to share your personal information. Where we are required by law to collect your personal information, or where we need your personal information in order to provide the Service to you, if you do not provide this information when requested (or you later ask to delete it), we may not be able to provide you with our services. We will tell you what information you must provide to receive the Service by designating it as required at the time of collection or through other appropriate means.

THIRD-PARTY SITES AND SERVICES

The Service may contain links to other websites and other online services operated by third parties. These links are not an endorsement of, or representation that we are affiliated with, any third party. In addition, our content may be included on web pages or online services that are not associated with us. We do not control third party websites or online services, and we are not responsible for their actions. Other websites and services follow different rules regarding the collection, use and sharing of your personal information. We encourage you to read the privacy policies of the other websites and online services you use.

SECURITY

The security of your personal information is important to us. We employ a number of organizational, technical and physical safeguards designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of your personal information.

INTERNATIONAL DATA TRANSFERS

We are headquartered in the United States and have service providers in other countries, and your personal information may be transferred to the United States or other locations outside of your state, province, or country where privacy laws may not be as protective as those in your state, province, or country.

European Union users should read the important information provided [below](#) about transfer of personal information outside of the European Union.

CHILDREN

The Service is not directed to, and we do not knowingly collect personal information from, anyone under the age of 16. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us. We will delete such information from our files as soon as reasonably practicable. We encourage parents with concerns to contact us.

CONTACT INFORMATION

Please direct any comments or questions about this Privacy Policy or privacy practices to cabe@ulodging.com. You may also contact us at our address:

Ulodging Inc
1783 Forest Drive, #341
Annapolis, Maryland 21401

CHANGES TO THIS PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. [If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the Service.](#) We may also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail (if you have an account where we have your contact information) or another manner through the Services.

Any modifications to this Privacy Policy will be effective upon our posting the new terms and/or upon implementation of the new changes on the Services (or as otherwise indicated at the time of posting). In all cases, your continued use of the Services after the posting of any modified Privacy Policy indicates your acceptance of the terms of the modified Privacy Policy.

YOUR CALIFORNIA PRIVACY RIGHTS

Under California Civil Code section 1798.83, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request to us via email at cabe@ulodging.com. You must put the statement "Your California Privacy Rights" in your request and include your name, street address, city, state, and ZIP code. We are not responsible for notices that are not labeled or sent properly, or do not have complete information.

NOTICE TO EUROPEAN USERS

The information provided in this "Notice to European Users" section applies only to individuals in Europe.

Personal information. References to "personal information" in this Privacy Policy are equivalent to "personal data" governed by European data protection legislation.

Controller. ULodging Inc is the controller of your personal information covered by this Privacy Policy for purposes of European data protection legislation.

Legal bases for processing. We use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Policy are described in the table below.

<p><u>Processing purpose</u></p> <p><i>Details regarding each processing purpose listed below are provided in the section above titled "Use of Personal Information."</i></p>	<p>Legal basis</p>
<p>To operate the Service</p>	<p>Processing is necessary to perform the contract governing our provision of the Services or to take steps that you request prior to signing up for the Services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the Service you access and request.</p>
<ul style="list-style-type: none"> • To administer events and contests • To send you marketing communications • For compliance, fraud prevention and safety • To create anonymous data 	<p>These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).</p>
<p>To comply with law</p>	<p>Processing is necessary to comply with our legal obligations.</p>
<p>With your consent</p>	<p>Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or in the Service.</p>

Use for new purposes. We may use your personal information for reasons not described in this Privacy Policy where permitted by law and the reason is compatible with the purpose for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and explain the applicable legal basis.

Sensitive personal information. We ask that you not provide us with any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services, or otherwise to us.

If you provide us with any sensitive personal information to us when you use the Services, you must consent to our processing and use of such sensitive personal information in accordance with this Privacy Policy. If you do not consent to our processing and use of such sensitive personal information, you must not submit such sensitive personal information through our Services.

RETENTION

We retain personal information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements, to establish or defend legal claims, or for fraud prevention purposes.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

When we no longer require the personal information we have otherwise collected about you, we will dissociate such information from the information attached to your content. In some circumstances we may anonymize your personal information (so that it can no longer be associated with you), in which case we may use this information indefinitely without further notice to you.

YOUR RIGHTS

European data protection laws give you certain rights regarding your personal information. If you are located within the European Union, you may ask us to take the following actions in relation to your personal information that we hold:

- **Access.** Provide you with information about our processing of your personal information and give you access to your personal information.
- **Correct.** Update or correct inaccuracies in your personal information.
- **Delete.** Delete your personal information.
- **Transfer.** Transfer a machine-readable copy of your personal information to you or a third party of your choice.
- **Restrict.** Restrict the processing of your personal information.
- **Object.** Object to our reliance on our legitimate interests as the basis of our processing of your personal information that impacts your rights.

You may submit these requests by email to cabe@ulodging.com or our postal address provided [above](#). We may request specific information from you to help us confirm your identity and process your request. Applicable law may require or permit us to decline your request. If we decline your request, we will tell you why, subject to legal restrictions. If you would like to submit a complaint about our use of your personal information or our response to your requests regarding your personal information, you may [contact us](#) or submit a complaint to the data protection regulator in your jurisdiction. You can find your data protection regulator [here](#).

CROSS-BORDER DATA TRANSFER

If we transfer your personal information out of Europe to a country not deemed by the European Commission to provide an adequate level of personal information protection, the transfer will be performed:

- Pursuant to the recipient's compliance with standard contractual clauses, EU-US Privacy Shield (or Swiss-US Privacy Shield, as applicable), or Binding Corporate Rules
- Pursuant to the consent of the individual to whom the personal information pertains
- As otherwise permitted by applicable European requirements.

You may contact us if you want further information on the specific mechanism used by us when transferring your personal information out of Europe.

ULODGING INC COOKIE POLICY
Last Modified: June 1, 2019

This Cookie Policy explains how Ulodging Inc (“**Ulodging**”, “**we**”, “**us**” or “**our**”) uses cookies and similar technologies in connection with the www.ulodging.com website and any other website that we own or control and which posts or links to this Cookie Policy (collectively, the “**Sites**”).

[What are cookies?](#)

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies serve different purposes, like helping us understand how a site is being used, letting you navigate between pages efficiently, remembering your preferences and generally improving your browsing experience.

Our Sites may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer or mobile device until you delete them).

We use two broad categories of cookies: (1) first party cookies, served directly by us to your computer or mobile device, which we use to recognize your computer or mobile device when it revisits our Sites; and (2) third party cookies, which are served by service providers or business partners on our Sites, and can be used by these parties to recognize your computer or mobile device when it visits other websites. Third party cookies can be used for a variety of purposes, including site analytics, advertising and social media features.

[What types of cookies and similar tracking technologies does Ulodging use on the Sites?](#)

On the Sites, we use cookies and other tracking technologies in the following categories described in the table below.

Type	Description	Who serves the cookies	How to control them
<i>Analytics</i>	These cookies help us understand how our Service is performing and being used. These cookies may work with web beacons included in emails we send to track which emails are opened and which links are clicked by recipients.	Google Analytics	See ‘Your Choices’ below. Google Analytics uses its own cookies. You can find out more information about Google Analytics cookies here and about how Google protects your data here . You can prevent the use of Google Analytics relating to your use of our Sites by downloading and installing a browser plugin available here .
<i>Essential</i>	These cookies are necessary to allow the technical operation of our Service (e.g., they enable you to move around on a website and to use its features).	Google Tag Manager	See ‘Your Choices’ below.

<i>Functionality/performance</i>	Enhance the performance and functionality of our Service.	Intercom	See 'Your Choices' below.
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Other Technologies

In addition to cookies, our Sites may use other technologies, such as Flash technology to pixel tags to collect information automatically.

Browser Web Storage

We may use browser web storage (including via HTML5), also known as locally stored objects (“LSOs”), for similar purposes as cookies. Browser web storage enables the storage of a larger amount of data than cookies. Your web browser may provide functionality to clear your browser web storage.

Web Beacons

We may also use web beacons (which are also known as pixel tags and clear GIFs) on our Sites and in our HTML formatted emails to track the actions of users on our Sites and interactions with our emails. Unlike cookies, which are stored on the hard drive of your computer or mobile device by a website, pixel tags are embedded invisibly on webpages or within HTML formatted emails. Pixel tags are used to demonstrate that a webpage was accessed or that certain content was viewed, typically to measure the success of our marketing campaigns or engagement with our emails and to compile statistics about usage of the Sites, so that we can manage our content more effectively.

Your Choices

Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Sites may not work properly.

For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org. If you do not accept our cookies, you may experience some inconvenience in your use of our Sites. For example, we may not be able to recognize your computer or mobile device and you may need to log in every time you visit our Sites.

Users may opt out of receiving targeted advertising on websites through members of the Network Advertising Initiative by clicking [here](#) or the Digital Advertising Alliance by clicking [here](#). European users may opt out of receiving targeted advertising on websites through members of the European Interactive Digital Advertising Alliance by clicking [here](#), selecting the user’s country, and then clicking “Choices” (or similarly-titled link). Please note that we also may work with companies that offer their own opt-out mechanisms and may not participate in the opt-out mechanisms that we linked above.

If you choose to opt-out of targeted advertisements, you will still see advertisements online but they may not be relevant to you. Even if you do choose to opt out, not all companies that serve online behavioral advertising are included in this list, and so you may still receive some cookies and tailored advertisements from companies that are not listed.

For more information about how we collect, use and share your information, see our [Privacy Policy](#).

Changes

Information about the cookies we use may be updated from time to time, so please check back on a regular basis for any changes.

Questions

If you have any questions about this Cookie Policy, please contact us by email at cabe@ulodging.com