

# **Global Privacy Statement**

Last Updated: Dec 13, 2024

**INTRODUCTION.** Cozy Corners mission is to provide luxurious short term and medium term property rentals for an affordable price. We're passionate about delivering exceptional guest experiences, and we look forward to welcoming you to our properties.

We pledge to deliver the highest level of customer service, which includes respecting your privacy and protecting your personal information. In this privacy statement ("Statement"), we provide you with details about how we collect, use, and disclose your personal information.

This Statement applies to Cozy Corners LLC and its subsidiaries (collectively, "Cozy Corners," "we," or "us").

By using any of our products or services and/or by agreeing to this Statement, e.g. in the context of registering for any of our products or services, you understand and acknowledge that we will collect and use personal information as described in this Statement.

Please note that this Statement does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as airlines, car rental companies and other service providers, companies that organize or offer packaged travel arrangements, marketing partners, or certain corporate customers.

**COLLECTION OF PERSONAL INFORMATION – GENERALLY.** The following summarizes the categories of personal information we have collected in the past 12 months, the sources for those categories of personal information, the business or commercial purposes for which the information was collected, the categories of third parties with whom the information may have been shared, as permitted by law, and whether the information was sold to a third party for a business or commercial purpose within the past 12 months. Certain categories of personal information collected are required in order for us to provide you with the requested products or services, and if you choose not to provide us with such information, we may not be able to provide you with these products or services. If consent is required, we will obtain your consent before selling or sharing your personal information.

We have collected the following categories of	We have obtained this personal information	We collected this personal information for the following	We have shared this personal information with the following	This information was sold to a third party
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<b>personal information in the past 12 months:</b>	<b>from the following sources:</b>	<b>business or commercial purposes:</b>	<b>categories of third parties:</b>	<b>within the past 12 months</b>
Name	Directly from consumers themselves	Provide customer service and support  Verify identity  Process payments, including conducting strong customer authentication (SCA) when required by law  Process transactions with partners	Payment card issuers and payment processors  Government agencies pursuant to legal requirements in some countries	No
Payment card information	Directly from consumers themselves	Process payments, including conducting SCA when required by law  Maintain books and records to comply with legal obligations for business reporting, auditing, tax, and income reconciliation  Detect and prevent fraud	Payment card issuers and payment processors	No
Images or footage captured by closed circuit television (CCTV)	Directly from cameras located on and around the property	Protect guests, employees, service providers, and visitors to properties  Comply with applicable laws that require us to collect this information in some jurisdictions	Government agencies pursuant to legal requirements in some countries  Law enforcement  The management and/or owners of a property if the image and footage relates to their property	No
IP addresses	Directly from consumers as a result of their browsing activity on the internet	Conduct SCA as part of the payment process, when required by law  Optimize our websites and mobile apps  Troubleshoot and resolve website issues  Detect and prevent fraud	Payment card issuers and payment processors (only when conducting SCA)	No
Geolocation information	Directly from consumers as a result of their browsing activity on the internet	Detect and prevent fraud  Marketing	None	No
Device information (including MAC address)	Directly from consumers as a result of their browsing activity on the internet	Marketing  Detect and prevent fraud	None	No
Description of an incident that occurs at a Cozy Corners property or involves a Cozy Corners employee or service provider, including	Directly from consumers themselves  Directly from Cozy Corners employees and service providers	Respond to safety & security concerns  Better serve our guests	Law enforcement  The management and/or owners of a property if the incident relates to that property	No

incidents related to safety, security, violation of law, violation of applicable policy, or violation of contractual obligation	Directly from law enforcement	Comply with legal or contractual obligations	Others as required by law	
Description of a complaint that you make to us	Directly from consumers themselves	Respond to safety and security concerns  Better serve our guests  Comply with legal or contractual obligations	The management and/or owners of a property	No

**CLOSED CIRCUIT TELEVISION.** We use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our properties for the protection of our staff, guests and visitors to our properties, in accordance with applicable laws that require us to collect information that is used to protect guests, employees, and visitors of the property. We retain CCTV in accordance with our data retention policies, as necessary to fulfill the purpose for which that information was collected, or as required or permitted by law. You may be able to request access to CCTV images within the time specified by applicable law and as required by law.

**MINORS.** Cozy Corners does not knowingly collect, disclose, or sell personal information of individuals under the age of majority in their respective jurisdiction without permission from a minor's parent or guardian.

**COOKIES AND OTHER TECHNOLOGIES.** Like many other websites, our site may use "Cookies" or "Other Technologies" (such as "pixel tags," "web beacons," "clear GIFs," links in emails, JavaScript, device IDs assigned by Google or Apple, or similar technologies). Cookies and Other Technologies allow us and third parties to obtain information about your visits to the site, including to analyze your visiting patterns. We use this information to process your reservations or requests and to deliver online and mobile advertisements, messages and content for us and others that are specific to your interests. Depending on your jurisdiction, prior consent for the use of non-essential Cookies may be required. If it is the case, we will obtain your consent before using Cookies on your device.

Cookies are small text files that are stored on your computer or mobile device ("device") when you visit a website. Cookies alone cannot be used to disclose your individual identity to us, though in some cases we may tie Cozy Corners or third-party Cookies to personal information you have provided to us or that we have otherwise obtained about you. Cookies may be used on the site in order to improve your experience. For example, we will use Cookies to:

- Ensure you obtain all requested information;
- Provide a safe and secure service for online transactions;
- Track your response to advertisements and website or app content for analysis and the number of times we send you the same advertisement; Measure how many people use the site, and how they use it, so that we may keep it running quickly and efficiently; and
- Help us and others deliver communications and content to you that are relevant and responsive to your interests and location.

Below we explain the different types of Cookies that may be used on the site.

- **Essential Cookies** – Essential Cookies are necessary for the site to work, and enable you to move around it and use its services and features. Disabling these Cookies may make the services and features unavailable.
- **Functional Cookies** – We use Functional Cookies to save your settings on the site—settings such as your language preference, or booking information you have previously used when booking a hotel with us. We also use Functional Cookies to store such things as the last hotel you searched for, so that you can easily find it the next time you visit. Some Functional Cookies are essential to viewing maps or videos on our site.
- **Session Cookies** – These types of Cookies are stored only temporarily during a browsing session, and are deleted from your device when you close the browser. We use Session Cookies to support the functionality of the site and to understand your use of the site—that is, which pages you visit, which links you use and how long you stay on each page.
- **Persistent Cookies** – These types of Cookies are not deleted when you close your browser, but are saved on your device for a fixed period of time or until you delete them. Each time you visit the site, the server that set the Cookie will recognize the persistent Cookie saved on your device. We and others use persistent Cookies to store your preferences, so that they are available for your next visit, to keep a more accurate account of how often you visit the site, how often you return, how your use of the site may vary over time and the effectiveness of advertising efforts.
- **Advertising Cookies** – Allow us and other advertisers to show you the most relevant products, offers, and advertisements on the site and third-party sites, or through emails or other message platforms. For example, some Advertising Cookies help our service providers and other advertisers select advertisements that are based on your interests, including those expressed or inferred by visits to our websites or apps or across other websites, online services, and apps over time. Others help prevent the same advertisement from continuously reappearing for you. These types of Cookies also help us provide you with content on the site that is tailored to your interests and needs. As

noted below, some Analytics Cookies and Other Technologies are used in part to facilitate advertising.

- Social Plug-In Cookies – Advertising Cookies also include Social Plug-In Cookies. Social Plug-In Cookies are used to share content from the site with members and non-members of social media networks such as Facebook, Twitter, YouTube and Pinterest. These Cookies are usually set by the social networking provider, enabling such sharing to be smooth and seamless.
- Analytics Cookies – Collect information about your use of the site, and enable us to improve the way it works. These Cookies give us aggregated information that we use to monitor site performance, count page visits, spot technical errors, see how users reach the site, and measure the effectiveness of advertising (including emails we send to you).
- Other technologies may be used for the same purposes as our Cookies, to allow us and third parties to know when you visit the site, and to understand how you interact with emails or advertisements. Through Other Technologies, non-personal information (e.g., your operating system, your browser version, and the URL you came from) or aggregate information may be obtained and used to enhance your experience and understand traffic patterns.

If you want to remove or block Cookies from your device at any time, you can update your browser settings (consult your browser's "help" menu to learn how to remove or block Cookies). Cozy Corners is not responsible for your browser settings. You can find good and simple instructions on how to manage Cookies on the different types of web browsers at [www.allaboutcookies.org](http://www.allaboutcookies.org).

Please be aware that rejecting Cookies may affect your ability to perform certain transactions on the Site, and our ability to recognize your browser from one visit to the next.

**HOW WE PROTECT PERSONAL INFORMATION.** We take reasonable measures to: (i) protect personal information from unauthorized access, disclosure, alteration, or destruction, and (ii) keep personal information accurate and up-to-date as appropriate.

We require third parties with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information.

We will never ask you to send us confidential personal information or payment card information via email or text message.

In the event of a security incident, Hilton will notify regulators and/or consumers as required by applicable laws and regulations.

**DISCLOSURE PURSUANT TO LEGAL OBLIGATIONS.** Cozy Corners will disclose personal information as required by law. Examples of such disclosures include when countries require Cozy Corners to collect personal data about visitors to properties in that country, when a law enforcement agency serves a valid subpoena on Cozy Corners, and when a civil litigant serves a lawful discovery request on Cozy Corners. Cozy Corners may elect to share personal information with law enforcement, employers, those who host events with Cozy Corners, or others as necessary to protect the safety and security of people and property, to pursue available remedies or limit the damages that we may sustain, and to respond to an emergency.

**DATA RETENTION PERIODS.** We retain personal information about you necessary to fulfill the purpose for which that information was collected or as required or permitted by law. When we destroy your personal information, we do so in a way that prevents that information from being restored or reconstructed.

**CHANGES TO THIS STATEMENT.** We may modify this Statement from time to time. You can tell when this Statement was last updated by looking at the date at the top of the Statement. Any changes to our Statement will become effective upon posting of the revised Statement on the site. Use of the site, any of our products and services, and/or providing consent to the updated Statement following such changes constitutes your acceptance of the revised Statement then in effect.

**CONTACT INFORMATION FOR QUESTIONS OR CONCERNS.** If you have any questions or concerns, please contact us by sending an email to [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com).

**ADDITIONAL PROVISIONS APPLICABLE TO CALIFORNIA CONSUMERS.** The Right to Know, The Right to Delete, and the Right to Opt-Out of the Sale or Sharing of Personal Information

The California Consumer Privacy Act (“CCPA”) affords California consumers (1) the right to know what personal information we collect, use, disclose, and/or sell; (2) the right to request that we delete their personal information; and (3) the right to request that we no longer sell or share their personal information.

If you would like information about the personal information that we collect, disclose, sell and/or share about you, or if you would like to make a request for us to delete or to stop selling your personal information, please email us at [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com) to submit your request.

When we receive your request, we will first verify your identity. Once we have verified your identity, the DPO will promptly fulfill your request

If you would like, you may designate an authorized agent to make a request on your behalf. To designate an authorized agent, please submit an order issued by a court, a document submitted by a barred attorney, or a formal certified document issued by an official governmental agency.

### **Sensitive Personal Information**

We limit the use of your personal information to that use which is necessary to perform reasonably expected services or as required by law.

### **Direct Marketing Disclosure**

California consumers also may request information about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. Such requests must be submitted to us at [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com). Within thirty days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

### **The Right to Non-Discrimination**

The CCPA prohibits a business from treating a consumer differently because the consumer exercised a right conferred on him/her by the CCPA. We welcome you to exercise your rights under the CCPA, and we will not discriminate against you for doing so.

### **Financial Incentive Notice**

Hilton does not offer a financial incentive for the collection, sale, or deletion of personal information. As detailed in this Statement, Cozy Corners primarily collects personal data from guests in order to fulfill guest reservations. Cozy Corners also collects personal data for marketing and other purposes as permitted by applicable law.

### **Removal of Content**

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com). Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

**ADDITIONAL PROVISION APPLICABLE TO NEVADA CONSUMERS.** If you are a Nevada resident, you may request that we stop selling certain categories of personal information that we collect. To submit a request at [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com). When the we receive your request, we will first verify your identity. Once we have verified your identity, the we will promptly fulfill your request.

**ADDITIONAL PROVISION APPLICABLE TO FRENCH RESIDENTS.** French residents: as disclosed in this Statement, we may collect your phone number to fulfill guest reservations, send guests communications relating to their reservations, provide customer service and support, verify identity, send marketing communications via SMS, process transactions with partners, authenticate mobile accounts, send service-related SMS communications, and detect and prevent fraud. We will not use your phone number for telemarketing. Nonetheless, if you would like to register on the list of opposition to telephone canvassing, you may do so at [www.bloctel.gouv.fr](http://www.bloctel.gouv.fr).

**ADDITIONAL PROVISION APPLICABLE TO HONG KONG CONSUMERS.** If you are based in Hong Kong, we will obtain your consent on or before sending you any marketing messages. You may opt out of receiving marketing messages from us at any time by using the unsubscribe link found in our marketing messages.

If you would like to access or correct your personal information, please contact us at [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com). We may require further information from you in order to verify your identity before processing your request. In certain circumstances where permitted to do so under applicable law, we may refuse to fulfill your request.

## **Appendix A:**

# **ADDITIONAL PROVISIONS APPLICABLE TO PROCESSING OF PERSONAL INFORMATION OF RESIDENTS OF CERTAIN COUNTRIES AND US STATES**



This Appendix provides additional information for individuals residing in countries and U.S. states that have enacted privacy laws giving certain additional rights to residents of those jurisdictions. Once effective, the U.S. states include, but are not limited to, California, Colorado, Connecticut, Delaware, Florida, Indiana, Iowa, Montana, Nevada, Oregon, Tennessee, Texas, Utah, and Virginia. These countries include, but are not limited to, those in the European Economic Area (EEA), the United Kingdom and Switzerland, as well as Australia, Brazil, China, Korea, Hong Kong, Monaco, Israel, Japan, Nigeria and Türkiye. This Appendix outlines certain additional information that Hilton is obligated to provide to you, as well as certain rights you have with respect to the processing of your personal information, pursuant to applicable local laws. This Appendix will control to the extent it conflicts with any provision in the main body of this Statement.

Controller: Please email [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com) for the contact information of other entities that may receive your personal data.

#### Purposes and Legal Basis for Processing

Cozy Corners processes your personal information for the purposes set forth in the section titled Collection of Personal Information - Generally of the main body of this Statement.

The legal bases for Cozy Corners processing activities include processing such information as necessary to comply with our contractual obligations, compliance with our legal obligations, protecting the safety of our employees, guests and others, for our legitimate business interests, and pursuant to your consent.

The particular legal basis for the processing of your personal information is based on the purpose for which such information was provided or collected:

Surveys: Completion of surveys is voluntary – we process the information obtained from surveys on the basis of your consent and in furtherance of our business interests, including marketing, service improvements, and analytics.

We collect certain additional personal information during registration/check-in at our properties (such as national ID or passport information), as necessary to comply with our legal obligations.

We use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our properties for the protection of our staff, service providers, guests and visitors to our properties.

**Direct Marketing:** We use your personal information to send you marketing messages on the basis of your consent. You may withdraw your consent for direct marketing communications at any time by contacting us at [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com).

**Retention:** We retain personal information about you for the time necessary to accomplish the purpose for which such information was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect applicable statute of limitation periods and legal requirements.

## Data Subject Rights

Some regional, national, and state laws confer rights relating to personal data as indicated in the Personal Data Requests Portal. Residents of certain jurisdictions may have the following rights.

**Access, Correction and Erasure Requests:** You have the right to:

ask us to confirm whether we are processing your personal information and receive information on how your data is processed

obtain a copy of your personal information

request that we update or correct your personal information

request that we delete personal information in certain circumstances

**Right to Object to Processing:** You have the right to request that Cozy Corners cease processing of your personal information: for marketing activities, including profiling for statistical purposes where such processing is based on our legitimate business interests, unless we are able to

demonstrate a compelling legitimate basis for such processing or we need to process your personal information for the establishment, exercise or defense of a legal claim

Right to Restrict Processing: You have the right to request that Cozy Corners limit the processing of your personal information:

while Cozy Corners is evaluating or in the process of responding to a request by you to update or correct your personal information where such processing is unlawful and you do not want Cozy Corners to delete your data

where Cozy Corners no longer requires such data, but you want us to retain the data for the establishment, exercise or defense of a legal claim

where you have submitted an objection to processing based on our legitimate business interests, pending our response to such request

Where we limit the processing of your personal information pursuant to your request, we will inform you prior to re-engaging in such processing.

Right to Object to Sale and Share: You have the right to request that Cozy Corners not sell or share your personal information. Please email Cozy Corners at [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com) to submit a request

Data Portability Requests: You have the right to request that we provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that we have obtained directly from you and only where our processing is based on consent or the performance of a contract.

Submitting Requests: Your requests may be submitted in writing to [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com) .

We will respond to all such requests within the time period permitted by law. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity. We may charge you a reasonable fee for subsequent copies of data that you request.

If you want to present a complaint or have concerns about our data practices or the exercise of your rights, you may contact [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com). For the EEA, the supervisory authorities are available at the European Data Protection Board's website. For the UK, the supervisory authority is available at [ico.org.uk](https://ico.org.uk).

**Right to Withdraw Consent:** You have the right to withdraw your consent to any processing that we conduct solely based on your consent (such as sending direct marketing materials to your personal email account). You may withdraw your consent to marketing activities by contacting [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com). For any other activities for which you have previously consented, you may contact [cozycorners2023@gmail.com](mailto:cozycorners2023@gmail.com) to withdraw such consent.

**Right to Object to Segmentation (also referred to as profiling) and Automated Decision Making:** You have the right to object to segmentation or profiling and automated decision making. We use personal information to divide large groups of consumers into sub-groups of consumers (known as segments) based on some type of shared characteristics such as geography, behavior, or demographics.

With your consent, we make automated decisions, meaning without human interference, using segmentation and/or your specific personal information to offer you certain benefits based on your characteristics (such as discounted room rates or other special offers based on your geography, behavior, or demographics). For example, if you travel frequently during the week to hotels in France, we may send you special offers for Cozy Corners properties in France.

**International Data Transfers:** We may transfer the personal information we collect about you pursuant to the purposes described in this Statement to countries that have not been found by the European Commission to provide adequate protection. In particular, we transfer your personal information to the United States.