

# Online Privacy Statement

(Last Updated May 24, 2018)

We are dedicated to protecting your privacy and safeguarding your "personally identifiable" information. We are committed to using our customers' information only in a responsible manner. We are committed to respecting your privacy and adhering to the principles of applicable data protection and privacy laws.

This Online Privacy Statement is an explanation of the information we collect, how we use it, and how the use of this information can benefit your experience on our websites and during your relationship with us. The information outlined below will assist you in making informed decisions while doing business with us.

In order to provide multiple access points to the services and products we offer, PC Housing Inc. Pasha Management Inc., both California corporations, dba PC Housing operates directly, or through its affiliates, subsidiaries, or service providers, many websites, including [www.pchousing.com](http://www.pchousing.com), and other websites listed here (individually, "Website" and collectively, "Websites".)

PC Housing is fully committed to providing you with information about the collection and use of personally identifiable information furnished by, or collected from, visitors while using its Websites and services. PC Housing collects information about its customers and visitors to its Websites so that it can provide an experience that is responsive to customers' and visitors' needs.

## Method of Collection of Information

PC Housing does not collect personally identifiable information when you browse the PC Housing Websites unless you voluntarily and knowingly provide such information. This means that we will not know your name, your email address, or any other personally identifiable information just because you browse the PC Housing Websites unless you:

- access a Website from a link in an email that we sent;
- are a myPC, and log-in to your account; or
- have created a profile and log-in when you access a Website.

When we do need to collect personally identifiable information from you, we will ask you, your employer, your relocation company or travel agency to voluntarily supply us with the information we need. For example, if you would like to make a reservation at one of our properties, we will ask you for information such as name, address, telephone number, email address, credit card number and room preference to process your reservation. We may collect this information directly from you by telephone, fax, email, at the counter, upon completion of an application or enrollment form, or through your use of the Websites.

Information may also be collected as part of: (i) fulfilling reservation or information requests, (ii) registering for myPC program membership, (iii) submitting a job application, (iv) submitting a credit application, or (v) responding to communications from us or our affiliates (e.g., surveys, promotional offers, or reservation confirmations), (vi) registering for, or responding to a subscription request for our newsletter. We endeavor to collect information only with your knowledge and with your permission if necessary.

### **Types Of Information**

The types of personally identifiable information that we collect may include your name, home, work and email addresses, telephone and fax numbers, credit card information, date of birth, gender, salary, social security number (in limited instances), password and security responses, and lifestyle information, such as room preferences, leisure activities, and other information necessary to fulfill special requests (e.g., health conditions that require special room accommodations). We will retain your information for a minimum of 18 months after your last transaction with us.

PC Housing may also collect non-personally identifiable information about you, such as your use of our websites, communication preferences, travel habits, aggregated data relative to your stays, and responses to promotional offers and surveys.

You may be offered the choice not to submit your personal information or to decide what communications you want to receive from us. However, doing so may cause certain transactions to become affected. For example, failure to provide your name will prevent the processing of reservations.

### **Use of Information**

PC Housing will never sell your information to third parties or allow its use in any manner except with the purpose to reasonably ensure and permit the business relationship that you wish to establish with PC Housing.

PC Housing may disclose your information to others with that purpose in the following ways:

- when we have received your written consent to do so;
- when you voluntarily choose to include personally identifiable information in a publicly accessible area of a Website (e.g., public profile);
- we may use “cookies” information and “automatically collected” information to: (a) personalize our services, such as remembering your information so that you will not have to re-enter it during your visit or the next time you visit the Websites; (b) provide customized third party advertisements, content, and information; (c) monitor and analyze the effectiveness of the Websites and third party marketing activities; (d) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (e) track your entries, submissions, and status in any promotions or other activities.

- when we communicate with employers, relocation companies, travel agencies, companies or organizations, who have made reservations, agreed to make payments, arranged for discounts, or purchased services on your behalf or if you use our services under a corporate or other commercial account;
- if you seek to have your rental charges invoiced to your employer or any other third party, we may disclose personally identifiable data about you to that employer or third party and to any companies that assist the third party in processing invoices;
- when we report to credit card issuers, credit reporting and fraud checking agencies and debt collection agencies, but only to the extent necessary to comply with contractual agreements;
- if you choose to do business with us through, or with the assistance of, your employer's or any third party's travel agent, relocation company or other intermediary, we may disclose personally identifiable data about you to the employer or other intermediary to make, modify or cancel a reservation made by or with the assistance of the agent, to respond to questions or comments made by the agent on your behalf, to facilitate any other task that the employer or intermediary advises us that you intend for the agent to fulfill, or that such an agent would, as a matter of industry practice, typically fulfill;
- in situations where sharing or disclosing your information is required in order to offer you services you desire, but only in the event we advise you of our intention to share such information;
- when companies or service providers that perform business activities on behalf of PC Housing require such information (e.g., credit card processing, customer support services, market research administration or database management services)
- in the event PC Housing is merged with, PC Housing or its assets are acquired by, or PC Housing acquires another company, in any of these circumstances, we reserve the right to transfer or assign the information that we have collected from you, in connection therewith;
- to comply with legal or regulatory requirements or obligations in accordance with applicable law or court order, judicial or other government subpoena or warrant, and otherwise in our good faith belief that disclosure is necessary or appropriate to satisfy any law, regulation or other governmental request, to operate any Website properly, or to protect or defend our rights or the rights or well-being of our employees, users or others or if you are involved (or are suspected by governmental authorities or our security functions to be involved) in any illegal activity; or
- in case of emergency such as to safeguard the life, health, or property of an individual. If personally identifiable information is shared as mentioned above, we will limit the scope of such information that is furnished solely to the amount necessary for the performance of the specific function. We may confirm personal information you provide us on applications and forms, or as a resident of one of our communities, with third parties, such as your bank, employer, present mortgage company or landlord, utility providers, government entities, credit agencies, and other businesses where you have an account or a credit card.

Unless otherwise precluded by legal process, we require third parties to protect your personally identifiable information in a similar manner as set forth in this Privacy Statement, and abide by applicable privacy laws and regulations.

### **Use of Email**

We will use your email address to send a confirmation and, if necessary, may use the other information to contact you for help in processing the reservation. We also may use your email address to:

- send you pre-arrival confirmation details;
- notify you about special offers and promotions;
- communicate emergency or crisis-related information;
- send you copies of your bills when you request them; and
- send you periodic satisfaction or market research surveys.

### **Consent**

As part of our commitment to keep you informed, we may contact you via mail, email, telephone, text message, or by other means to confirm your departure date, ensure your customer satisfaction, notify you of new PC Housing products and services, or upcoming PC Housing special offers, events, enhancements, or other relevant information that may be of interest to you. You may also receive mailings or other communications from carefully selected partners, such as our customer satisfaction surveyors. We may offer you the option to decline any or all of these communications by following the directions included in our emails or other communications, or by contacting PC Housing directly.

PC Housing strives to keep all our customers and visitors informed and equally able to take advantage of the benefits offered by PC Housing and its strategic marketing partners. However, if you reside outside of the United States, certain data privacy regulations may require us to obtain your permission before we send you information that you have not requested from us.

In some cases, your permission will be implied from the nature of the service requested or transaction undertaken. For example, PC Housing may collect and use personally identifiable information that you volunteer, or behavioral data or information collected in the aggregate. In addition, your permission will be deemed given for communications from us that are necessary to fulfill transactions and services that you request.

### **International Visitors and Data Transfers Across International Borders**

The nature of our business and our operations may require us to transfer your information, including personally identifiable information, to other group companies, properties, centers of operations, data centers, or service providers that may be located in countries outside of your own. Although the data protection and other laws of these various countries may not be as comprehensive as those in your own country, PC Housing will take appropriate steps to ensure that your personally identifiable information is protected and handled as described in this Privacy Statement.

## Contracts

For the Japan Personal Information Protection Act. For the EU Data Directive, please visit <http://dsv.su.se/jpalme/society/eu-personal-privacy-directive.html>.

The Websites are hosted in the United States and are intended solely for visitors located within the United States. If you choose to use any Website from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personally identifiable information outside of those regions to the United States for storage and processing, and by providing your personally identifiable information on the any Website you consent to that transfer, storage, and processing. PC Housing may limit the availability of any Website or any service or product described on any Website to any person or geographic area at any time. If you choose to access any Websites from outside the United States, you do so at your own risk. If you live outside of the United States, you understand and agree that we may transfer your information to the United States.

## Access

It is PC Housing's intent and one of our missions to keep your personal information accurate, complete, and up to date for the purposes for which it is used. You can help us ensure that your contact information and preferences are accurate and complete, you can contact us with the request to correct, update, delete or deactivate it either by emailing our us or by contacting us by telephone or postal mail at the contact information listed below. Please provide your full name and street address and telephone number on your request.

To update or change your information or to opt-out of receiving marketing material:

1. Follow directions on a marketing e-mail or direct mail communication from us, or
2. Call 1-858-622-1881, or
3. Send an email with your current contact information to [Informationprotection@PCHousing.com](mailto:Informationprotection@PCHousing.com), or
4. Send a request with your current contact information to:  
PC Housing  
Attn: Operations Department  
7084 Miramar Rd  
San Diego, CA 92121

PC Housing will take reasonable steps to implement your request to opt out. However, please note that due to production and mailing timelines, it may take approximately six (6) weeks to make the requested change and, until that change takes effect, you may still receive promotional information from us. Although we will make no more marketing use of information you have asked to be deleted, occasionally, information that you request to be removed will be retained in certain files for a period of time in order to properly resolve disputes or to troubleshoot problems. In addition, some types of

information may be stored indefinitely on back-up systems or within log files due to technical, financial or legal requirements.

## **Security**

PC Housing recognizes the importance of information security, and is constantly reviewing and enhancing all technical, physical, and logical security rules and procedures. PC Housing uses reasonable methods to secure your personal information from unauthorized access, use or disclosure. After information reaches PC Housing, it is stored in an encrypted format on secure servers that reside behind firewalls designed to block unauthorized access from outside of PC Housing. All PC Housing owned Websites and servers have security measures in place to help protect your personally identifiable information against loss, misuse, and alteration while under our control. Although guaranteed security does not exist either on or off the internet, we safeguard your information using both procedural and technical safeguards. PC Housing secures the personally identifiable information you provide on computer servers in a controlled, secure environment. When personal information (such as a credit card number, or other financial information) is transmitted through our website, it is protected through the use of encryption by way of a Network Solutions' service known as Secure Sockets Layer (SSL), an encryption method used to help protect your data from interception and hacking while in transit. PC Housing protects against unauthorized access of this data by using both technology and comprehensive security policies.

## **Cookies**

PC Housing may use cookies, pixel tags or Web beacons to obtain information while visiting our websites.

A cookie is a very small text file that is sent to your browser from a Web server and stored on your computer's, or mobile device's hard drive. It assigns the computer with a unique identifier, which in turn, becomes your identification card whenever you return to an PC Housing Website.

Cookies are designed to save you time because they help us provide a customized experience tailored just for you without having to remind us of your preferences each time you return to our websites. PC Housing cookies are not designed to damage your files, nor can they read information from other files on your computer hard drive.

Cookies also help us provide a personalized online experience in the following ways:

- They remember your user name and password for future visits so log-in is easier and faster
- They ensure you are provided with the appropriate frames and content;
- They ensure you obtain all requested information; and
- They help us deliver communications that are relevant and responsive to your interests and location.

PC Housing cookies are limited to our Websites only, and are not designed to follow you when traveling on the internet after leaving PC Housing's Websites. We track the usage of our Websites in order to better meet your needs and to help make it easier for you to find information in the future. Please note that in addition to PC Housing cookies, various third parties may also place cookies on your computer's hard drive. PC Housing is not responsible for the presence or absence of third party cookies, or for the technological capabilities or practices employed by third parties in connection with third party cookies.

If you would prefer not to have the benefits of cookies, your internet browser or other third party software on your workstation can be adjusted to treat cookies in different ways. Depending upon the type of browser you are using, you may be able to configure your browser so that: (i) you are prompted to accept or reject cookies on an individual basis; or (ii) you may be able to prevent your browser from accepting any cookies at all. You should refer to the supplier or manufacturer of your Web browser for specific details about cookie security. However, you should also understand that rejecting cookies might affect your ability to perform certain transactions on our Websites and our ability to recognize your browser from one visit to the next.

### **Web Beacons**

PC Housing also uses pixel tags, sometimes called Web beacons, to count how many people visit certain Web pages. Information collected from invisible pixels is used and reported in the aggregate and does not contain personally identifiable information. PC Housing may use this information to improve marketing programs and content.

PC Housing and our email service provider also use pixel tags to:

- Track customer response to PC Housing advertisements and Website content;
- Determine your ability to receive HTML-based email messages. Our email service provider includes a pixel tag, which they refer to as a coded sensor in all of the HTML-based messages sent on our behalf. The sensor activates when the email message is opened and flags the email address of the user as one that is capable of receiving HTML-based email messages. This capability helps our service provider to send the email in a format you can read. The sensor does not collect or use any other information. If you cannot receive HTML, you will not receive a functioning sensor;
- Know how many users open an email and allow our service provider to compile aggregated statistics about an email campaign for us; and
- Allow us to better target interactive advertising, enhance customer support and Website usability, and provide offers and promotions that we believe would be of interest to you.

### **Links To Other Websites**

In order to anticipate your needs, PC Housing provides links to other websites for your convenience and information. PC Housing is not responsible or liable for any content presented by or contained within any independent website, including, but not limited to,

any advertising claims or marketing practices. Please note that while PC Housing will protect your information on PC Housing owned and operated Websites, we cannot control and will not be responsible for the privacy policies of third party websites, or websites not controlled or authorized by PC Housing. Third party websites that are accessed through links on our Websites have separate privacy and data collection practices, and security measures. We have no responsibility or liability for the practices, policies and security measures implemented by third parties on their websites. We recommend that you review the privacy statements and policies of linked websites to understand how those websites collect, use and store information.

Some of the PC Housing Websites may use a reputable third party to present or serve the advertisements that you may see at its websites. These third party ad servers may use cookies, web beacons, clear .gifs or similar technologies to help present such advertisements, and to help measure and research the advertisements' effectiveness. The use of these technologies by these third party ad servers is subject to their own privacy policies and is not covered by our privacy policy.

### **Co-branded Pages and Third-Party Service Providers**

Portions of the Websites are operated by third-party service providers ("Providers"). Providers may place cookies on your computer or mobile device in order to store information or store your account login.

Our agreement with Providers requires the information to be kept confidential and disclosed only to Providers employees who require such access in the course of their assigned duties. PC Housing may change the provider from time to time, and will transfer stored information to the new providers subject to similar restrictions.

Points of interest and mapping information on PC Housing Property's Profile pages are provided by Google Maps. Your use of this information is not stored or collected by PC Housing. Click the following links for Google [Maps Terms of Use](#) and Google Maps [Privacy Policy](#) .

### **Our Commitment to Children's Privacy**

PC Housing is committed to protecting the privacy of minors. If you are under the age of thirteen (13), we ask that you do not use the Websites. PC Housing does not seek to obtain, nor does it wish to receive personally identifiable information directly from minors; however, we cannot always determine the age of persons who access and use our Websites. If we do learn that personally identifiable information has been collected on any Website from a minor and without verifiable parental consent, then we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your minor child has obtained an account on Website or has otherwise provided personally identifiable information, you may alert us at [Informationprotection@PCHousing.com](mailto:Informationprotection@PCHousing.com), and request that we delete that child's personally identifiable information from our Websites.

## **Contact Us**

PC Housing takes its users' privacy concerns seriously. If you have comments or questions regarding PC Housing's data privacy practices or this Online Privacy Statement or you would like to update your information, modify your communication preferences, or if you do not want to receive marketing communications from PC Housing in the future, you can contact us at:

PC Housing  
7084 Miramar Rd.  
San Diego, CA 92121  
USA

Email: [Informationprotection@PCHousing.com](mailto:Informationprotection@PCHousing.com)

Telephone: 1-858-622-1881

In your letter, please describe your inquiry in as much detail as possible.

## **Changes and Updates to this Online Privacy Statement**

Please revisit this page periodically to stay aware of any changes to this Online Privacy Statement, which may be revised periodically at our sole discretion. If we modify this Online Privacy Statement, we will make it available through the Websites, and indicate the date of the latest revision. In the event that the modifications materially alter your rights or obligations hereunder, we will make reasonable efforts to notify you of the change. For example, we may send a message to your e-mail address, if we have one on file, or generate a pop-up or similar notification when you sign-in to any Website for the first time after such material changes are made. Our amended Online Privacy Statement will automatically take effect 30 days after it is made available through the Websites, except that (i) we generally only use your personally identifiable information in the manner described in the Online Privacy Statement in effect when we received that information and (ii) if you do not agree with any changes to the Online Privacy Statement, you may terminate your account. Your continued use of any Website after the revised Online Privacy Statement has become effective indicates that you have read, understood and agreed to the current version of the Online Privacy Statement.

Should you have any dispute, claim or controversy arising out of or relating to this policy and wish to file a complaint, please contact PC Housing via one of the mechanisms mentioned above.

## **Effective Date**

This Privacy Policy is effective with respect to all data that we have collected since the date we started collecting data, which was January 1, 2000.