



# Terms & Conditions and Privacy Policy

## TERMS AND PRIVACY

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January 1, 2019

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### Introduction

This Notice explains how the Association of Independent Hospitality Professionals (AIHP) collects and processes your Personal Data. Each time you use our Site, the current version of this Notice will apply. Accordingly, whenever you use our Site, you should check the date of this Notice (which appears at the top) and review any changes since the last version. This Notice is applicable to all Site visitors, registered users, and all other users of our Site.

“Personal Data” is any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

By visiting [www.independent-innkeeping.org](http://www.independent-innkeeping.org) or related properties, (together the “Site”), you acknowledge that you have read and understood the processes and policies referred to in this Notice.

## Who we are?

For the purposes of the General Data Protection Regulation 2016/679 (the “GDPR”), the Data Controller is the Association of Independent Hospitality Professionals registered in the state of South Carolina, USA, with a registered address at P.O. Box 126639 Harrisburg, Pennsylvania 17112.

Our Chief Executive Officer, Robert Fulton, is responsible for overseeing questions in relation to this Notice for the purposes of the GDPR.

## How to contact us

If you have any questions or concerns about this Notice, please contact the following:

Rob Fulton, CAE  
CEO  
[rob@independent-innkeeping.org](mailto:rob@independent-innkeeping.org)  
717-433-6813

Or

AIHP  
P.O. Box 126639  
Harrisburg, PA 17112

## How we collect personal data

### Personal Data that you give us

We may collect and process the following Personal Data:

- **Contact information**, which you provide when corresponding with us by phone, e-mail or otherwise. This includes information you provide when you participate in discussion boards or other social media functions on our Site and when you report a problem with our Site. The information you give us may include your name, address, e-mail address, phone number, financial information and/or credit card information.
- **Membership information**, about your membership including your name, contact details such as address, phone number and email address (business or personal), age, job title, government identification numbers (e.g. social security number, passport number etc.), year of admission and any other information related to your membership. Membership information may be provided by you during the registration process, or by your employer on your behalf.
- **Due payment information**, including financial information such as credit/debit card and account numbers used to register or renew your membership.
- **Purchase information**, relating to purchases made by members and non-members of delegate passes and event participation, books, reports, journals or newsletter subscriptions either in-person or via our Site.

Purchase information will include financial information as well as information concerning the content and time of the purchase.

- **Disciplinary information**, relating to ethics/disciplinary programs in which complaints against members are adjudicated, with the result being possible suspension/expulsion from membership. This may include extensive information about a member's business or professional activities, including employment information, and similar information relating to other individuals involved in the investigation, though would usually not include financial information.
- **Certification information**, relating to certification programs, in which members are granted certification if they meet specified educational/employment experience requirements and/or pass an exam. This may include extensive information about the experience/performance of those certified or accredited. Where the certification concerns an institutions or businesses, this may include similar information identifying employees and other members of staff including volunteers.

### **Personal data we collect from you**

With regard to each of your visits to the Site we will automatically collect the following information:

- **Technical information**, including the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- **Information about your visit**, including pages you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number; and
- **Location information**

### **Personal Data we collect from others**

We may receive information about you from publicly available and third-party databases or services that provide information about business people that we believe will help us identify provide products and services that may be of interest to you. We will obtain your consent before contacting you if required by the law of the country in which you are located.

### **Non-Personal Data**

We collect information that is sent to us automatically by your web browser and we may use this information to generate aggregate statistics about visitors to our Site, including, without limitation:

- IP addresses
- Browser type and plug-in details
- Device type (e.g., desktop, laptop, tablet, phone, etc.)
- Operating system
- Local time zone

We may use non-Personal Data for various business purposes such as providing customer service, fraud prevention, market research, and improving our Site. Please check your web browser if you want to learn what information your browser sends or how to change your settings.

## **How we use your Personal Data**

We will only process your Personal Data, including sharing it with third parties, where (1) you have provided your consent which can be withdrawn at any time, (2) the processing is necessary for the performance of a contract to which you are a party, (3) we are required by law, (4) processing is required to protect your vital interests or those of another person, or (5) processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

## **Personal Data that you give us**

We may use Personal Data that you provide directly to us for the following purposes:

- to carry out our obligations arising from your membership, or any other contract entered into between you and us and to provide you with the information, products and membership services that you request from us;
- to organize events that you have purchased or registered for, and to provide you with information, and other materials, relating to the content of the event, the speakers, sponsors and other attendees;
- to provide our newsletter and other publications, provided you have given your consent;
- to respond to your questions and provide related membership services;
- to provide you with information about other events, products and services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information;
- to provide you, or permit selected third parties to provide you, with information about events, products or services we feel may interest you, provided you have given your consent;
- to transfer your information as part of a merger or sale of the business;
- to notify you about changes to our membership service; and
- to ensure that content from our Site is presented most effectively for you and your computer.

## **Information we collect about you**

We will use Personal Data that we have collected about your use of our Site:

- to administer our Site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; to improve our Site to ensure that content is presented most effectively for you and your computer;
- as part of our efforts to keep our Site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our Site about goods or services that may interest you or them.

## **Personal Data we receive from other sources**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined Personal Data for the purposes set out above (depending on the types of information we receive).

## **When we share and who can access your Personal Data**

We may share your Personal Data for the purposes described in this Notice with:

- a member of our group
- partners, suppliers and sub-contractors, for the performance of obligations arising from your membership, or any other contract we enter into with them or you or to provide you with the information, products and membership services that you request from us
- analytics and search engine providers that assist us in the improvement and optimization of our Site
- trusted third-party companies and individuals to help us provide, analyze, and improve the Site and our membership services (including but not limited to data storage, maintenance services, database management, web analytics and payment processing)
- in the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets
- if AIHP or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.

We will only transfer your Personal Data to trusted third-parties who provide sufficient guarantees in respect of the technical and organizational security measures governing the processing to be carried out and who can demonstrate a commitment to compliance with those measures.

## **Selling your Personal Data**

We will never sell your Personal Data to third parties without your opt-in consent.

## **Security**

Although we use security measures to help protect your Personal Data against loss, misuse or unauthorized disclosure, we cannot guarantee the security of information transmitted to us over the internet.

All information you provide to us is stored on secure servers.

Any payment transactions will be encrypted using SSL technology.

## **Transfer of Personal Data outside of the European Economic Area (“EEA”) and International Users**

We are headquartered in the United States. Your Personal Data may be accessed by us or transferred to us in the United States or to our affiliates, partners, merchants, or service providers who are located worldwide. If you are visiting our Site from outside the United States, be aware that your information may be transferred to, stored, and processed in the United States where our servers are located, and our central database is operated. By using our Service, you consent to any transfer of this information.

## **How Long we Store your Personal Data**

We will store your Personal Data, in a form which permits us to identify you, for no longer than is necessary for the purpose for which the Personal Data is processed. We may retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if

it is not technically reasonably feasible to remove it. Consistent with these requirements, we will try to delete your Personal Data quickly upon request.

## **Retention**

We will retain your information for as long as your account is active or as needed to provide you with our Site. If you wish to cancel your account or request that we no longer use your information to provide you service, contact us at [patty@independent-innkeeping.org](mailto:patty@independent-innkeeping.org). We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We maintain one or more databases to store your Personal Data and may keep such information indefinitely.

## **Where we store your personal data**

The Personal Data that you provide to us is generally stored on servers located in the United States. If you are located in another jurisdiction, you should be aware that once your Personal Data is submitted through our Site, it will be transferred to our servers in the United States and that the United States currently does not have uniform data protection laws in place

## **Children's Privacy**

Our Sites are not directed to children under the age of 13, if you are not 13 years or older, do not use our Site. We do not knowingly collect Personal Data from children under the age of 13. If we learn that Personal Data of persons less than 13 years-of-age has been collected through our Site, we will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child or a minor under the age of 13 has posted, submitted or otherwise communicated Personal Data to our Site without your consent, then you may alert us at [patty@independent-innkeeping.org](mailto:patty@independent-innkeeping.org) so that we may take appropriate action to remove the minor's Personal Data from our systems.

## **Links to Third Party Sites and Services**

Our Sites may contain links to third party websites, applications and services not operated by us. These links are provided as a service and do not imply any endorsement by us of the activities or content of these sites, applications or services nor any association with their operators. Company is not responsible for the privacy policies or practices of any third-party including websites or services directly linked to our Service. We encourage you to review the privacy policies of any third-party site that you link from our Service.

## **Your rights**

### **Correction and removal**

If any of the information that we have about you is incorrect, or you wish to have information (including Personal Data) removed from our records, you may do so by visiting the your ***AIHP member profile*** or contacting us at [patty@independent-innkeeping.org](mailto:patty@independent-innkeeping.org).

### **Opting Out**

Additionally, if you prefer not to receive marketing messages from us, please let us know by clicking on the unsubscribe link within any marketing message that you receive, by visiting your [AIHP Membership profile](#), or by sending a message to us at [patty@independent-innkeeping.org](mailto:patty@independent-innkeeping.org).

## Your European Rights

FOR EUROPEAN RESIDENTS ONLY. You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your Personal Data) if we intend to use your Personal Data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Data. You can also exercise the right by contacting us directly, using the information in the Contact us section on our Site.

Under European data protection law, in certain circumstances, you have the right to:

- **Request access to your Personal Data.** You may have the right to request access to any Personal Data we hold about you as well as related information, including the purposes for processing the Personal Data, the recipients or categories of recipients with whom the Personal Data has been shared, where possible, the period for which the Personal Data will be stored, the source of the Personal Data, and the existence of any automated decision making.
- **Request correction of your Personal Data.** You may have the right to obtain without undue delay the rectification of any inaccurate Personal Data we hold about you.
- **Request erasure of your Personal Data.** You may have the right to request that Personal Data held about you is deleted.
- **Object to processing of your Personal Data.** You may have the right to prevent or restrict processing of your Personal Data.
- **Request restriction of processing your Personal Data Request transfer of your Personal Data.** You may have the right to request transfer of Personal Data directly to a third party where this is technically feasible.
- **Withdraw your consent**

In addition, where you believe that AIHP has not complied with its obligations under this Notice or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office.

You can exercise any of these rights by contacting us using the Contact Us section on our Site.

## Your Californian Rights

FOR RESIDENTS OF CALIFORNIA ONLY. Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your Personal Data with third parties. If you reside in California and have provided your Personal Data to ASAE, you may request information about our disclosures of certain categories of Personal data to third parties for direct marketing purposes. Such requests must be submitted to us at one of the following addresses: [patty@independent-innkeeping.org](mailto:patty@independent-innkeeping.org)

AIHP  
Attn: Rob Fulton, CEO  
P.O.Box 126639  
Harrisburg, PA 17112

### **Changes to this Notice**

If we make any material changes to this Notice or the way we use, share or collect personal Data, we will notify you by revising the “Effective Date” at the top of this Notice, prominently posting an announcement of the changes on our Site, or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect.

Any changes we make to this Notice in the future will be posted on this page and, where appropriate, notification sent to you by e-mail. Please check back frequently to see any updates or changes to this Notice.