

## Privacy Policy

Spruce Mountain Inn (“us”, “we”, or “our”) operates the <https://sprucemountaininn.com/> website (the “Service”). This page informs you of our policies regarding the collection, use, and disclosure of personally identifiable information, or “PII” (defined below), when you use our Service and the choices you have associated with that PII, except for protected health information submitted by you in the course of using our Service, which is covered HIPAA and discussed in our HIPAA Policy. Any conflict between this Privacy Policy and the HIPAA Policy with respect to such submitted personal health information shall be resolved in favor of the HIPAA Policy. Personally Identifiable Information, or PII, means any information that may be used to identify an individual, including, but not limited to, a first and last name, email address, a home, postal or other physical address, and phone number. We use your PII to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy.

- **Categories of Information We Collect**

- Information You Provide to Us. While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you, including, but not limited to: email address, first name and last name, phone number, and address. By consenting to this policy, you agree that we may use your PII to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.
- Usage Data. We may also collect information how the Service is accessed and used (“Usage Data”). This Usage Data may include information such as your computer’s Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
- Location Data. We may use and store information about your location if you give us permission to do so (“Location Data”). We use this data to provide features of our Service, to improve and customize our Service. You can enable or disable location services when you use our Service at any time, through your device settings.
- Tracking Cookies Data. We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with

small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service. Examples of Cookies we use:

- *Session Cookies.* We use Session Cookies to operate our Service.
- *Preference Cookies.* We use Preference Cookies to remember your preferences and various settings.
- *Security Cookies.* We use Security Cookies for security purposes.
- Areas of Data Collection. We may collect your personal data throughout the following areas throughout your contact and relationship with us:
  - Contact or Other Form Entries
  - User Comments and Related PII
  - Newsletter Subscriptions
  - User Analytics
  - Website Chat
  - Call Tracking
  - CRM Systems
  - Social Sharing

- **Use and Disclosure of Information We Collect**

- Use and Disclosure of Information. We use the collected PII for various purposes: (1) to provide and maintain our Service; (2) to notify you about changes to our Service; (3) to allow you to participate in interactive features of our Service when you choose to do so; (4) to provide customer support; (5) to gather analysis or valuable information so that we can improve our Service; (6) to monitor the usage of our Service; (7) to detect, prevent and address technical issues; (8) to provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or inquired about unless you have opted not to receive such

information. More detail about some of these categories is provided below. We may also disclose PII for the following purposes:

- *Business Transaction:* If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different Privacy Policy.
  - *Disclosure for Law Enforcement:* Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).
  - *Legal Requirements:* We may disclose your PII in the good faith belief that such action is necessary: (1) to comply with a legal obligation; (2) to protect and defend our rights or property; (3) to prevent or investigate possible wrongdoing in connection with the Service; (4) to protect the personal safety of users of the Service or the public; or (5) to protect against legal liability.
- Analytics. We may use third-party Service Providers to monitor and analyze the use of our service.
- *Google Analytics:* Google Analytics is a web analytics service offered by Google Inc. (Google) that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>
- Behavioral Remarketing. We may use remarketing services to advertise on third-party websites to you after you visited our Service. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Service.

- *Google AdWords*: Google AdWords remarketing service is provided by Google. You can opt-out of Google Analytics for Display Advertising and customize the Google Display Network ads by visiting the Google Ads Settings page: <https://adssettings.google.com/>. Google also recommends installing the Google Analytics Opt-out Browser Add-on – <https://tools.google.com/dlpage/gaoptout> – for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics. For more information on the privacy practices of Google, please visit the Google Privacy Terms web page: <https://policies.google.com/privacy?hl=en>
  - *Facebook*: Facebook remarketing service is provided by Facebook, Inc. (Facebook). You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>. To opt-out from Facebook's interest-based ads follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>. Facebook adheres to the Self-Regulatory Principles for Online Behavioral Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <https://youradchoices.ca/>, or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings. For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>.
- **Service Providers** We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services, or to assist us in analyzing how our Service is used. These third parties have access to your PII only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.
- **Links to Other Sites** Our Service may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy policy of every site you visit. We have no

control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

- **Security of Data** The security of your data is important to us, but no method of Internet transmission or electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

- **California Residents**

A. Do Not Track. We do not monitor, recognize, or respond to any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals. Further, we do not authorize third parties to collect any personally identifiable information about individuals who visit our site without separate consent.

B. Third-Party Direct Marketing. California residents are entitled to ask for a notice identifying the categories of PII which we share with certain third parties for direct marketing purposes under certain circumstances and providing contact information for such third parties. If you are a California resident and would like a copy of this notice, please submit a written request using the contact information at the end of this policy.

- **Children’s Privacy** Our Service does not address anyone under the age of 18. We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with PII, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.
- **Individuals Located in the European Economic Area (EEA)** The following section is applicable to those individuals located in the European Economic Area. Such individuals have certain data protection rights under the General Data Protection Regulation (GDPR), with respect to their “Personal Data,” meaning information about an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, location data, or online identifier.

A. Personal Data We Collect and Use. The information we collect, and the use and disclosure of that information, is addressed elsewhere in this Privacy Policy. We will not share your personal information with any third party other than those categories of recipients identified in this Privacy Policy.

B. Lawful Basis for Processing. Our legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it. We may process your Personal Data for the Service because: (1) we need to perform a contract with you; (2) you have given us permission to do so; (3) the processing is in our legitimate interests, as described in Section II(A), and is not overridden by your rights, or (4) to comply with the law. As described in Section II, we may engage in marketing and use cookies. Your consent to this Privacy Policy represents your agreement to such marketing and use of cookies, to the extent such consent is required.

C. Retention of Personal Data. We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

D. Transfer of your Personal Data out of the EEA. Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those from your jurisdiction. If you are located outside the United States and choose to provide information to us, please note that we transfer the data, including Personal Data, to the United States and process it there. The European Commission has not given a formal decision that the United States provides an adequate level of data protection similar to those which apply in the EEA. Spruce Mountain Inn will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information. Your consent to this Privacy Policy represents your agreement to the transfer.

E. Required Provision of Personal Data. You are not required to provide any Personal Data, but failure to do so may limit your use of the Service.

F. Your Rights. We do take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. In certain circumstances, you have the following data protection rights:

- *The right to access, update or delete the information we have on you.* Whenever made possible, you can access, update or request the deletion of your Personal Data directly within your account settings section. If you are unable to perform these actions yourself, please contact us to assist you.

- *The right of rectification.* You have the right to have your information rectified if that information is inaccurate or incomplete.
- *The right to object.* You have the right to object to our processing of your Personal Data. This includes objecting to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affecting you, and the right to object to the continued processing of your Personal Data.
- *The right of restriction.* You have the right to request that we restrict the processing of your personal information.
- *The right to data portability.* You have the right to be provided with a copy of the information we have on you in a structured, machine-readable, and commonly used format.
- *The right to withdraw consent.* You also have the right to withdraw your consent at any time where Spruce Mountain Inn relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

G. How to Complain. You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

- **Notification of Changes** Any changes in our Privacy Policy will be posted to this website and will become effective as of the date of posting with respect to the information we then collect in the future, but will not be changed with respect to information that we have then already collected. It is and will be your responsibility to review our Privacy Policy from time to time to make sure you are aware of any changes.
- **Effective Date** This Privacy Policy is effective July 25, 2025.
- **Questions** If you have any questions about this Privacy Policy, please contact us:
  - By visiting this page on our website: <https://sprucemountaininn.com/contact/>
  - By mail: Spruce Mountain Inn, 155 Towne Ave., Box 153, Plainfield, VT 05667
  - By Phone: 802-454-8353