



## **Privacy Policy**

### Information We Collect

Gunflint Lodge & Outfitters collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we may collect the following categories of personal information from consumers:

- (a) Personal identifiers such as: name, postal address, online identifiers, Internet Protocol address, email address, driver's license number, passport number, or other similar identifiers.
- (b) Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as: name, birth date, signature, Social Security number, address, telephone number, email address, passport number, driver's license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial information, height, weight, medical information, or health insurance information. Some personal information included in this category may overlap with other categories. We may use this information to contact you regarding past, current, or future goods or services we provide or to offer marketing specials and information. We may also use this information when determining eligibility and precautions necessary to participate in certain optional recreational activities, such as the Towering Pines Canopy Tour, horseback riding, and snowmobile rentals.
- (c) Vehicle information, such as vehicle make and model. This information is used to help us manage the vehicles that are on Gunflint property and may be shared with government agencies as allowed or required by law.
- (d) Protected classification characteristics under California or federal law, such as age, medical condition, physical or mental disability. We use this information when determining eligibility and precautions necessary to participate in certain optional recreational activities, such as the Towering Pines Canopy Tour, horseback riding, and snowmobile rentals.
- (e) Commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or preferences.

- (f) Internet or other similar network activity, such as browsing history, search history, information on a consumer's interaction with our website(s).
- (g) Geolocation data. We use this to target ads to people in specific locations. This information is used through third-party providers such as Google and Facebook and is not reviewed, tracked or stored by Gunflint.
- (h) Sensory data, such as audio, electronic, visual, or similar information. Security cameras are located in various public locations throughout the property, outdoors and in the Lodge. Our webcam is located on the patio behind the Lodge. Our staff may carry cameras to photograph or record events and activities occurring on the property. No cameras are used in the cabins, lodging, bathrooms, shower house, saunas, or other private areas of the Lodge.
- (i) For job candidates and employees, we collect personal identifiers and personal information as described above for the purpose of determining eligibility for employment and to allow us to properly pay you and collect taxes and qualified withholdings. Such information may be reported to government agencies as allowed or required by law. Protected classification characteristics may be gathered as necessary to make reasonable accommodations and may be reported to government agencies as allowed or required by law. Professional or employment-related information, such as current or past job history or performance evaluations may be gathered to allow us to make employment related decisions, such as for hiring and promotions.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from documents that you provide to us related to the goods and services we provide.
- Indirectly from you. For example, through information we collect from you in the course of providing services to you.
- Directly and indirectly from activity on our website ([www.gunflint.com](http://www.gunflint.com)). For example, from submissions through our website portal or website usage details collected automatically.

#### Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order to reserve a cabin, we use that information to secure the cabin reservation.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.

- To carry out our obligations and enforce our rights arising from any agreements entered into between you and us, including for billing, taking payment, and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

#### Sharing Personal Information

We never sell your personal information. We may disclose your personal information to a third party for a business purpose, such as our affiliates or service providers, or to a government agency when permitted or required by law.

#### Your Rights and Choices

The California Consumer Privacy Act (CCPA) provides California consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

You may contact us at any time to request that we disclose and/or delete personal information that we maintain for or about you.

#### *Access to Specific Information and Data Portability Rights*

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or disclosing that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:

- sales, identifying the personal information categories that each category of recipient purchased; and
- disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### *Your Right To Request Deletions*

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### *Exercising Access, Data Portability, and Deletion Rights*

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (800) 328-3325
- Emailing [info@gunflint.com](mailto:info@gunflint.com)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, or your parent or legal guardian if you are a minor child may make a verifiable consumer request related to your personal information. You may only make a

verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to effect the request.

#### *Response Timing and Format*

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

#### Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion at any time. When we make changes to this privacy notice, we will notify you by email or through a notice on our website homepage.

#### Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding

such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: (800) 328-3325

Website: [www.gunflint.com](http://www.gunflint.com)

Email: [info@gunflint.com](mailto:info@gunflint.com)

Gunflint Lodge & Outfitters

Attn: Privacy Officer

143 S. Gunflint Lake Road

Grand Marais, MN 55604

(effective November 1, 2019)