

ARCHER HOTEL CHATGPT APP PRIVACY POLICY

Last Updated: March 27, 2026

1. DATA CONTROLLER

LodgeWorks Partners, L.P., operating under the **Archer Hotel** brand (“**Archer Hotel**”, “**we**”, “**us**”, or “**our**”), acts as the **Data Controller** for the processing of personal data described in this Privacy Policy.

Registered Address:

8100 E. 22nd Street, Building 500
Wichita, KS 67226, United States

Contact (Privacy):

privacy@archerhotel.com

2. OUR APPROACH TO PRIVACY & PLATFORM RELATIONSHIP

This Privacy Policy explains how personal data is processed when you use the **Archer Hotel ChatGPT App** made available through the OpenAI platform.

The application operates within the OpenAI ecosystem. As such:

- OpenAI is responsible for **account creation, authentication, and platform-level processing** under its own terms and privacy policy.
- Archer Hotel does **not create or manage user accounts**, nor do we have access to your OpenAI credentials.
- Archer Hotel processes only the **limited data necessary** to generate responses via secure API calls.

We are committed to minimizing data collection and ensuring transparency in how your information is handled.

3. CATEGORIES OF PERSONAL DATA PROCESSED

Depending on how you interact with the application, we may process the following categories of data:

- **Identifiers:**
Such as IP address and device-related metadata
- **User Content (“Prompts”):**
Information you voluntarily submit in chat inputs
- **Internet Activity Data:**
Interaction logs, request timestamps, and usage patterns
- **Inferred or Aggregated Data:**
Non-identifiable insights used to improve system performance

We recommend that you **do not include sensitive or confidential personal data** in your prompts.

4. SOURCES OF PERSONAL DATA

We collect personal data from the following sources:

- **Directly from you:**
Through the content you submit in chat interactions
- **Automatically:**
Through technical metadata generated during use
- **From the OpenAI platform:**
As part of standard request routing and processing

5. PURPOSES OF PROCESSING & LEGAL BASES (GDPR)

We process personal data strictly for the following purposes:

- **Service Delivery**
To generate and return responses requested by the user
→ *Legal basis: Article 6(1)(b) GDPR (performance of a contract)*
- **Security & Fraud Prevention**
To protect systems, detect abuse, and ensure platform integrity
→ *Legal basis: Article 6(1)(f) GDPR (legitimate interests)*
- **Service Improvement**
To enhance performance, reliability, and quality of responses
→ *Legal basis: Article 6(1)(f) GDPR (legitimate interests)*

6. DISCLOSURE OF PERSONAL DATA

We may share data with trusted third parties strictly where necessary to operate the service:

- **OpenAI** – platform infrastructure and processing
- **Google Cloud Platform (GCP)** – hosting and infrastructure
- **Cloudflare** – security, content delivery, and network protection

All third-party providers are contractually obligated to:

- Process data only on our instructions
- Maintain appropriate security safeguards
- Comply with applicable data protection laws

We do not sell or share personal data for cross-context behavioral advertising.

7. DATA RETENTION

We follow a strict **data minimization and limited retention approach**:

- **Chat Data:**
Processed transiently and not stored in a persistent, identifiable format
- **Technical Logs:**
Retained for up to **30 days** solely for security, debugging, and fraud prevention
- **User Profiles:**
No persistent user accounts or profiles are created by Archer Hotel

8. INTERNATIONAL DATA TRANSFERS

Personal data may be processed in the **United States** and other jurisdictions where our service providers operate.

Where required, we implement appropriate safeguards, including:

- **Standard Contractual Clauses (SCCs)**
- Additional contractual and technical protections

9. COOKIES & TRACKING TECHNOLOGIES

The Archer Hotel ChatGPT App does **not directly set cookies**.

However:

- The OpenAI platform may use cookies for authentication and functionality
- Cloudflare may process IP data for security and performance purposes

We do not use advertising or tracking cookies.

10. YOUR PRIVACY RIGHTS (GDPR & CCPA)

Depending on your location, you may have the following rights:

- **Right of Access** – obtain a copy of your data
- **Right to Rectification** – correct inaccurate data
- **Right to Erasure** – request deletion of your data
- **Right to Restrict Processing**
- **Right to Object to Processing**
- **Right to Data Portability**
- **Right to Non-Discrimination (CCPA)**

California residents may also request disclosure of categories of data collected or shared.

To exercise your rights, contact:
privacy@archerhotel.com

11. AUTOMATED DECISION-MAKING

We do **not** engage in automated decision-making or profiling that produces legal or similarly significant effects.

12. CHILDREN'S PRIVACY

This service is **not intended for individuals under the age of 16**.

We do not knowingly collect personal data from children.

13. SECURITY MEASURES

We implement appropriate technical and organizational safeguards, including:

- **Encryption (TLS)** for data in transit
- **Access controls** and authentication mechanisms
- **Secure infrastructure** via Google Cloud Platform and Cloudflare

We also ensure that all service providers maintain equivalent security standards.

14. SUPERVISORY AUTHORITY

You have the right to lodge a complaint with your local data protection authority if you believe your rights have been violated.

15. CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time.

Any changes will be reflected by updating the “**Last Updated**” date above. We encourage you to review this policy periodically.