

Pen&Public/W Hotels Worldwide – Marriott International Administrative Services, Inc.

Privacy Policy

Last modified: June 7, 2017.

When you share information with us, for example by creating a Marriott Account, or engaging in our promotions, we can make our services to you even better. As you use our services, we want you to be clear how we're using information and the ways in which you can protect your privacy.

Our Privacy Policy explains:

- What information we collect and why we collect it.
- How we use that information.
- The choices we offer, including how to access and update information.

We've tried to keep it as simple as possible, but if you're not familiar with terms like cookies, IP addresses, pixel tags and browsers, then read about these key terms (below) first. Your privacy matters to Marriott so whether you are new to Marriott or a longtime user, please do take the time to get to know our practices – and if you have any questions contact us.

Information we collect:

We collect information to provide better services to all of our users – from figuring out basic stuff like which language you speak, to more complex things like which ads you'll find most useful, the people who matter most to you online, or which YouTube videos you might like.

We collect information in the following ways:

- **Information you give us.** For example, many of our services require you to sign up for a Marriott Account. When you do, we'll ask for personal information, like your name, address, email address, telephone number or credit card to store with your account. If you want to take full advantage of the sharing features we offer, we might also ask you to create a publicly visible Marriott Profile, which may include your name and photo.
- **Information we get from your use of our services.** We collect information about the services that you use and how you use them, like when you visit a website that uses our advertising services, or view and interact with our ads and content. This information includes:
 - **Device information**
We collect device-specific information (such as your hardware model, operating system version, unique device identifiers, and mobile network information

including phone number). Marriott may associate your device identifiers or phone number with your Marriott Account.

- Log information

When you use our services or view content provided by Marriott, we automatically collect and store certain information in server logs. This includes:

- details of how you used our service, such as your search queries.
- telephony log information like your phone number, calling-party number, forwarding numbers, time and date of calls, duration of calls, SMS routing information and types of calls.
- Internet protocol address.
- device event information such as crashes, system activity, hardware settings, browser type, browser language, the date and time of your request and referral URL.
- cookies that may uniquely identify your browser or your Marriott Account.

- Location information

When you use Marriott services, we may collect and process information about your actual location. We use various technologies to determine location, including IP address, GPS, and other sensors that may, for example, provide Marriott with information on nearby devices, Wi-Fi access points, and cell towers.

- Unique application numbers

Certain services include a unique application number. This number and information about your installation (for example, the operating system type and application version number) may be sent to Marriott when you install or uninstall that service or when that service periodically contacts our servers, such as for automatic updates.

- Local storage

We may collect and store information (including personal information) locally on your device using mechanisms such as browser web storage (including HTML 5) and application data caches.

- Cookies and similar technologies

We and our partners use various technologies to collect and store information when you visit a Marriott service, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to

collect and store information when you interact with services we offer to our partners, such as advertising services or Marriott features that may appear on other sites. Our Marriott Analytics product helps businesses and site owners analyze the traffic to their websites and apps. When used in conjunction with our advertising services, such as those using the DoubleClick cookie, Marriott Analytics information is linked, by the Marriott Analytics customer or by Marriott, using Marriott technology, with information about visits to multiple sites.

Information we collect when you are signed in to Marriott, in addition to information we obtain about you from partners, may be associated with your Marriott Account. When information is associated with your Marriott Account, we treat it as personal information. For more information about how you can access, manage or delete information that is associated with your Marriott Account, visit the Transparency and choice section of this policy.

How we use information we collect:

We use the information we collect from all of our services to provide, maintain, protect and improve them, to develop new ones, and to protect Marriott and our users. We also use this information to offer you tailored content – like giving you more relevant search results and ads.

We may use the name you provide for your Marriott Profile across all of the services we offer that require a Marriott Account. In addition, we may replace past names associated with your Marriott Account so that you are represented consistently across all our services. If other users already have your email, or other information that identifies you, we may show them your publicly visible Marriott Profile information, such as your name and photo.

If you have a Marriott Account, we may display your Profile name, Profile photo, and actions you take on Marriott or on third-party applications connected to your Marriott Account (such reviews you write and comments you post) in our services, including displaying in ads and other commercial contexts. We will respect the choices you make to limit sharing or visibility settings in your Marriott Account.

When you contact Marriott, we keep a record of your communication to help solve any issues you might be facing. We may use your email address to inform you about our services, such as letting you know about upcoming changes or improvements.

We use information collected from cookies and other technologies, like pixel tags, to improve your user experience and the overall quality of our services. One of the products we use to do this on our own services is Marriott Analytics. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. When showing you tailored ads, we will not associate an identifier from cookies or similar technologies with sensitive categories, such as those based on race, religion, sexual orientation or health.

Our automated systems analyze your content to provide you personally relevant product features, such as customized search results, tailored advertising, and spam and malware detection.

We may combine personal information from one service with information, including personal information, from other Marriott services – for example to make it easier to share things with people you know. Depending on your account settings, your activity on other sites and apps may be associated with your personal information in order to improve Marriott’s services and the ads delivered by Marriott.

We will ask for your consent before using information for a purpose other than those that are set out in this Privacy Policy.

Marriott processes personal information on our servers in many countries around the world. We may process your personal information on a server located outside the country where you live.

Transparency and choice:

People have different privacy concerns. Our goal is to be clear about what information we collect, so that you can make meaningful choices about how it is used. For example, you can:

- Review and update your Marriott activity controls to decide what types of data, such as past searches, you would like saved with your account when you use Marriott services.
- View and edit your preferences about the Marriott ads shown to you on Marriott and across the web, such as which categories might interest you, using Ads Settings. You can also visit that page to opt out of certain Marriott advertising services.
- Adjust your Marriott Profile associated with your Marriott Account.
- Control who you share information with through your Marriott Account.
- Take information associated with your Marriott Account out of many of our services.
- Choose whether your Profile name and Profile photo appear in shared endorsements that appear in ads.

You may also set your browser to block all cookies, including cookies associated with our services, or to indicate when a cookie is being set by us. However, it’s important to remember that many of our services may not function properly if your cookies are disabled. For example, we may not remember your language preferences.

Information you share:

Many of our services let you share information with others. Remember that when you share information publicly, it may be indexable by search engines, including Marriott. Our services provide you with different options on sharing and removing your content.

Accessing and updating your personal information:

Whenever you use our services, we aim to provide you with access to your personal information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. When updating your personal information, we may ask you to verify your identity before we can act on your request.

We may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, developing a new system or fundamentally changing an existing practice), risk the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup systems).

Where we can provide information access and correction, we will do so for free, except where it would require a disproportionate effort. We aim to maintain our services in a manner that protects information from accidental or malicious destruction. Because of this, after you delete information from our services, we may not immediately delete residual copies from our active servers and may not remove information from our backup systems.

Information we share:

We do not share personal information with companies, organizations and individuals outside of Marriott unless one of the following circumstances applies:

- With your consent
We will share personal information with companies, organizations or individuals outside of Marriott when we have your consent to do so. We require opt-in consent for the sharing of any sensitive personal information.
- With domain administrators
If your Marriott Account is managed for you by a domain administrator then your domain administrator and resellers who provide user support to your organization will have access to your Marriott Account information (including your email and other data). Your domain administrator may be able to:
 - view statistics regarding your account, like statistics regarding applications you install.
 - change your account password.
 - suspend or terminate your account access.
 - access or retain information stored as part of your account.
 - receive your account information in order to satisfy applicable law, regulation, legal process or enforceable governmental request.
 - restrict your ability to delete or edit information or privacy settings.

Please refer to your domain administrator's privacy policy for more information.

- For external processing

We provide personal information to our affiliates or other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

- For legal reasons

We will share personal information with companies, organizations or individuals outside of Marriott if we have a good faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent, or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of Marriott, our users or the public as required or permitted by law.

We may share non-personally identifiable information publicly and with our partners – like publishers, advertisers or connected sites. For example, we may share information publicly to show trends about the general use of our services.

If Marriott is involved in a merger, acquisition or asset sale, we will continue to ensure the confidentiality of any personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

Information security:

We work hard to protect Marriott and our users from unauthorized access to or unauthorized alteration, disclosure or destruction of information we hold. In particular:

- We encrypt many of our services using SSL.
- We offer you two step verification when you access your Marriott Account, and a Safe Browsing feature at the Marriott site.
- We review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.
- We restrict access to personal information to Marriott employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

When this Privacy Policy applies:

Our Privacy Policy applies to all of the services offered by Marriott Inc. and its affiliates, services Marriott provides on Android and IOS devices, and services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you in search results, sites that may include Marriott services, or other sites linked from our services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Compliance and cooperation with regulatory authorities:

We regularly review our compliance with our Privacy Policy. We also adhere to several self-regulatory frameworks, including the EU-US and Swiss-US Privacy Shield Frameworks. When we receive formal written complaints, we will contact the person who made the complaint to follow up. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that we cannot resolve with our users directly.

Changes:

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Key Terms:

- **Affiliates:** An affiliate is an entity that belongs to the Marriott group of companies.
- **Application data cache:** An application data cache is a data repository on a device. It can, for example, enable a web application to run without an internet connection and improve the performance of the application by enabling faster loading of content.
- **Browser web storage:** Browser web storage enables websites to store data in a browser on a device. When used in "local storage" mode, it enables data to be stored across sessions (for example, so that the data are retrievable even after the browser has been closed and reopened). One technology that facilitates web storage is HTML 5.

- **Cookies and similar technologies:** A cookie is a small file containing a string of characters that is sent to your computer when you visit a website. When you visit the website again, the cookie allows that site to recognize your browser. Cookies may store user preferences and other information. You can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some website features or services may not function properly without cookies. Other technologies are used for similar purposes as a cookie on other platforms where cookies are not available or applicable, such as the Advertising ID available on Android mobile devices. Learn more about how Marriott uses cookies and how Marriott uses data, including cookies, when you use our partners' sites or apps.
- **Device:** A device is a computer that can be used to access Marriott services. For example, a device could be a desktop, tablet or smartphone.
- **Marriott Account:** You may access some of our services by signing up for a Marriott Account and providing us with some personal information (typically your name, email address and a password). This account information will be used to authenticate you when you access Marriott services and protect your account from unauthorized access by others. You can edit or terminate your account at any time through your Marriott Account settings.
- **HTTP Referrer:** An HTTP Referrer is information transmitted to a destination webpage by a web browser, typically when you click a link to that webpage. The HTTP Referrer contains the URL of the last webpage the browser visited.
- **IP address:** Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.
- **Non-personally identifiable information:** This is information that is recorded about users so that it no longer reflects or references an individually identifiable user.
- **Personal information:** This is information which you provide to us which personally identifies you, such as your name, email address or billing information, or other data which can be reasonably linked to such information by Marriott, such as information we associate with your Marriott account.

- **Pixel tag:** A pixel tag is a type of technology placed on a website or within the body of an email for the purpose of tracking activity on websites, or when emails are opened or accessed, and is often used in combination with cookies.
- **Sensitive Categories:** An advertising category may be sensitive if it relates to topics such as race, religion, sexual orientation, or health. When showing you tailored ads, we may associate an identifier from cookies or similar technologies with topics such as "Cooking and Recipes" or "Air Travel," but not with sensitive categories. We impose a similar policy on our advertisers.
- **Sensitive personal information:** This is a particular category of personal information relating to confidential medical facts, racial or ethnic origins, political or religious beliefs or sexuality.
- **Server logs:** Like most websites, our servers automatically record the page requests made when you visit our sites. These “server logs” typically include your web request, Internet Protocol address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify your browser.

Here is an example of a typical log entry where the search is for “cars”, followed by a breakdown of its parts:

```
123.45.67.89 - 25/Mar/2003 10:15:32 –
http://www.Marriott.com/search?q=cars –
Firefox 1.0.7; Windows NT 5.1 –
740674ce2123e969
```

- 123.45.67.89 is the Internet Protocol address assigned to the user by the user’s ISP; depending on the user’s service, a different address may be assigned to the user by their service provider each time they connect to the Internet;
- 25/Mar/2003 10:15:32 is the date and time of the query;
- http://www.Marriott.com/search?q=cars is the requested URL, including the search query;
- Firefox 1.0.7; Windows NT 5.1 is the browser and operating system being used; and
- 740674ce2123a969 is the unique cookie ID assigned to this particular computer the first time it visited Marriott. (Cookies can be deleted by users. If the user has deleted the cookie from the computer since the last time s/he visited Marriott, then it will be the unique cookie ID assigned to the user the next time s/he visits Marriott from that particular computer).

- **Unique device identifier:** A unique device identifier (sometimes called a universally unique ID or UUID) is a string of characters that is incorporated into a device by its manufacturer and can be used to uniquely identify that device (for example an IMEI-number of a mobile phone). Different device identifiers vary in how permanent they are, whether they can be reset by users, and how they can be accessed. A given device may have several different unique device identifiers. Unique device identifiers can be used for various purposes, including security and fraud detection, syncing services such as a user's email inbox, remembering the user's preferences and providing relevant advertising.