

# Global Privacy Statement

## Introduction

Marriott Vacations Worldwide Corporation (“MVWC”) is a global vacation company that offers vacation ownership, exchange, rental, and resort and property management, along with related businesses, products and services. MVWC has more than 180 resorts and nearly 660,000 Owners and Members in a diverse portfolio that includes seven vacation ownership brands. It also includes exchange networks and membership programs comprised of nearly 3,200 resorts in over 80 nations and approximately two million members, as well as management of more than 200 other resorts and lodging properties. As a leader and innovator in the vacation industry, the company upholds the highest standards of excellence in serving its customers, investors and associates while maintaining exclusive, long-term relationships with Marriott International and Hyatt Hotels Corporation for the development, sales and marketing of vacation ownership products and services.

MVWC has a strong commitment to providing excellent service to our customers, owners and guests, which includes respecting their concerns about privacy. This Global Privacy Statement (“Statement”) applies to MVWC and its affiliated operating companies (“Affiliates”), except for Aqua-Aston Hospitality, Hyatt Vacation Ownership, ILG, Interval International, Trading Places International, Vacation Resorts International, Vistana Signature Experiences, and Worldwide Vacation & Travel whose individual privacy practices are governed by each operating company’s privacy policy that can be found at their respective websites.

MVWC and its Affiliates (collectively referred to in this Statement as “we,” “our,” or “us”) have prepared this Statement to inform you of the privacy principles that govern our use of information we obtain from our customers, owners and guests, including information we obtain through websites we own or control (collectively, the “Websites”), your communications with us, our communications with you, mobile applications, your stay with us at one of our properties, or our license agreements with Marriott International, Inc. or the Ritz Carlton Hotel Company L.L.C.

This Statement, along with our Cookies & Related Technologies Table (the “Table”) that outlines our use of cookies and related technologies and is available [here](#), contains information about the steps we take to respect your privacy, the types of cookies and similar technologies we use, the information we collect, how we use that information, and for how long collected information is retained. We have organized the Statement by major topic areas, including region-specific details, so that you can quickly access and review the information of most interest to you. Please note that we are not affiliated with Marriott International, Inc. and the Ritz Carlton Hotel Company L.L.C., and a separate privacy statement and separate terms and conditions apply to the Marriott Rewards® program.

If, after reviewing this Statement and Table, you have any questions, privacy concerns, or wish to correct or update your information, please notify us via [privacy@mvwc.com](mailto:privacy@mvwc.com) or our postal address listed below. Our Privacy Officer also serves as our Grievance Officer and on behalf of our Privacy Department, as may be required under applicable countries’ and other jurisdictions’ regulations.

Marriott Vacations Worldwide Corporation  
Attn: Privacy Officer  
6649 Westwood Blvd.  
Orlando, FL 32821  
United States of America

Colombia: 1-800-011-0204

Also, if you do not want us to use your personal information for our direct marketing purposes, you may write to us at any time, and we will cease using the information for such purposes at no charge to you. Please send your request to [mvcioptout@mvwc.com](mailto:mvcioptout@mvwc.com).

Meeting your needs and expectations form the foundation of everything we do – including protecting your privacy.

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### **Information We Collect and Its Uses**

When we need to collect personal information to execute a transaction or provide a particular service you requested, we will ask you to voluntarily supply us with any information we need. In connection with a purchase and sale transaction, we may ask you for personal information such as name, address, telephone and facsimile numbers, email address, occupation, government issued ID number, and nationality and passport number. We may use such information to verify your identity, complete the transaction, administer your memberships associated with MVWC and/or its Affiliates, send you commercial messages, advise you of other offers and information, carry out general recordkeeping, maintain a list of current and former owners or members, create informational or analytical reports, supplement your disclosed information, carry out verifications, planning or other legitimate business needs of MVWC and/or its Affiliates, allow for revenue collection or debt recovery, respond to your inquiries or others who you have identified as an authorized agent or proxy, and such other purposes as permitted by applicable law.

Other circumstances in which we may need to collect and use your personal information include reservations, online payments, and other related business activities. For example, if you would like to make a reservation at one of our resorts, we will ask you for information such as name, address, telephone number and email address to process your reservation. If you elect to make an online payment, you will be asked to supply information that is necessary to process your payment. We typically use your email address to send a confirmation and, if necessary, might use the other information to contact you for help in processing. When you provide contact details for transaction requests, such as scheduling an appointment or requesting a proposal, we will use the contact information to keep you updated about our future offers or promotions.

We may also collect and use your personal information to satisfy any applicable law, regulation, legal process, or enforceable governmental request, or when we have a good faith belief that use and disclosure is necessary to investigate, prevent or protect against harmful activities to MVWC or Affiliates, owners, guests, visitors, associates, or property (including our Websites), or to others.

We may use third parties to provide, confirm or supplement for us other information based on the information you provided to us directly. We would then use this information for market analysis and our direct marketing purposes.

Personal information will be retained only until it is reasonable to assume that the purpose for which that personal information was collected is no longer being served by its retention and the retention is no longer necessary for legal or business purposes.

We will maintain your personal information in whole, usable and up-to-date form. Please contact us as described above in the event you would like to correct or update any of your information.

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### **Creating an Account Profile**

Owners of our products and programs may, at their choice, create a personal account profile online within our password-protected sites. Creating an account profile makes use of our sites more convenient for you by eliminating the need to repeatedly enter personal contact or preference information. In addition, if you choose, you can perform certain functions within your account, such as making online club dues or maintenance fee payments. The security of this information is addressed in the security section below. You can access and review, update or deactivate the information in your account profile online.

Please note that we will never send you an email requesting your user name, password, credit card, social security or national insurance numbers. If you receive an email that looks like it is from us, but asks you for your credit card number, social security or national insurance number, it is a fraudulent email or "phish."

If you believe "phishers" have obtained access to your personal or financial information, we recommend that you change your password and contact credit reporting services and have a fraud alert attached to your credit report file. Please be aware that the perpetrator may attempt to use your information to establish accounts or obtain credit at other businesses in their name or yours. We will not be able to secure your information and we will not be liable for any resulting breach of any

law if you reveal your password to anyone.

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### **Security of Information**

We treat the personal information you provide to us as confidential; it is, accordingly, subject to our organizational, physical, and technical security measures, procedures, and policies regarding protection and use of confidential information. After information reaches us, it is stored on a secure server that resides behind firewalls designed to block unauthorized access. Because laws applicable to personal information vary by country, additional measures that satisfy applicable legal requirements may be put in place.

When we ask you for credit card information, it is transferred using secure transmission protocols. We also use secure transmission protocols on other select pages where you would enter personal information. This ensures that your information is encrypted as it travels over the Internet. This secure mode is enabled before any such information is transmitted from your computer. You will know you are in secure mode when the padlock or key icon in the lower right-hand or left-hand corner of the computer screen appears in the locked position. In addition, when accessing a secure server, the first characters of the site address will change from "http" to "https." There is no guarantee, however, that the transmission, Internet, or storage system is fully secure. Please immediately notify us using the contact methods contained in the Introduction section of this Statement if you have reason to believe that your interaction with us has been compromised.

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### **Confidentiality of Identification Numbers**

When collected, Social Security, National Insurance and other government-issued identification numbers are treated with great care, including our satisfaction of applicable laws and regulations. Social Security, National Insurance and other government-issued identification numbers are collected and retained in order to comply with various United States Federal and State laws and International regulations. For general information systems, we use customer numbers and employee identification numbers that are not derived from government-issued identification numbers. We use policies, procedures, training, technology and auditing to protect the confidentiality and privacy of Social Security, National Insurance other government-issued identification numbers and ensure that proper controls are in place concerning the collection, use, disclosure, processing, recording, holding, storing, and/or sharing of this information.

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### **Disclosure of Information to Third Parties**

We do not sell your personal information to other companies. We do not transfer your personal information to other companies for their own use unless we have your approval and provide you the opportunity to opt-out. MVWC and its Affiliates, located in the United States and around the world, may share your personal information among themselves. We may maintain personal information in databases controlled by MVWC and/or any service providers and third parties (including auditors) engaged by MVWC and/or its Affiliates in the United States or other jurisdictions and may process, use, transfer and disclose such information to non-affiliated companies when we need to share your information to provide the product or service you have requested or need to send the information to companies who work on our behalf, to provide a product or service to you, for general recordkeeping, informational and/or analysis reports, to supplement your information, or have your consent when consent is necessary to share the information. These non-affiliated companies do not have any right to use the information we provide to them for any purpose beyond what is necessary to assist us. We will protect your personal information in accordance with applicable data protection laws and will take steps to ensure any transferees do the same.

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

- Satisfy any applicable law, regulation, legal process or enforceable governmental request;
- Investigate, prevent or otherwise address fraud, security, or technical issues; or
- Investigate, prevent or protect against harmful activities to MVWC or Affiliates owners, guests, visitors, associates, or property (including our Websites), or to others, as required or permitted by law.

We may disclose your personal information in relation to the reorganization, sale or disposal of all or a part of our business or assets, joint ventures and related business transactions, including in relation to audit or reporting and other regulatory requirements. Any successor or assign may use your personal information for the same reasons as set out in this Statement.

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### **Children's Privacy**

Our Websites are not intended for children and we do not knowingly solicit or collect personal information from children. If we are notified or discover that a child under the age of 13 has submitted personal information to us, we will take reasonable steps to delete the information.

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### **Cookies & Related Technologies**

We may collect certain information from cookies, pixel tags, web beacons or similar technologies for web analytics and direct marketing. Cookies are pieces of data stored on the computer or mobile device you are using. We use cookies to allow us to recognize the device you are using, save your selections and preferences, and provide you with a more customized and beneficial experience on our Websites, including providing the functionality that allows you to interact with a representative while you are on some of our Websites. Click [here](#) to learn more and to view our Cookies & Related Technologies Table. By continuing to use our Websites, you agree to our placing cookies on your computer or mobile device. We, however, will seek your explicit consent if you are in a jurisdiction that requires it.

We may use Facebook Conversion Tracking Pixel, Custom Audiences, and retargeting provided by Facebook, Inc. Facebook's tools enable us to follow the actions of visitors to our Websites who are redirected to our Websites after clicking on a Facebook advertisement; record the efficacy of Facebook advertisements for marketing, statistical, and market research purposes; and serve targeted advertisements on Facebook that match interests determined by your activity on our Websites. For further information on Facebook's data collection and use and about your rights and options to protect your privacy, please refer to Facebook's data protection policies at <https://www.facebook.com/about/privacy/>. You also can deactivate the Facebook Conversion Tracking Pixel at <https://www.facebook.com/settings/?tab=ads#>.

We may use Google AdWords cookies provided by Google Inc. for remarketing purposes. This technology enables (a) users who have already visited our Websites and have shown interest in our products or services to see targeted advertising on websites within the Google partner network and (b) us to provide targeted advertising based on user interest. You can opt-out of Google AdWords cookies by visiting the Google Ads Settings page at <http://www.google.com/settings/ads>.

You may set your browser to block, refuse, reject, or delete cookies (consult the instructions for your particular browser on how to do this), although doing so may adversely affect your ability to perform certain transactions, use particular functionality and access certain content on our Websites. We only use cookies or related technologies as your browser permits. For more information about cookies or if you do not want data collected with cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org), [www.aboutads.info](http://www.aboutads.info), and [www.networkadvertising.org](http://www.networkadvertising.org).

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### **Click to Chat**

We use third party software to proactively initiate or offer online chat if we believe you would benefit from assistance. All information you enter via online chat may be associated to your email address and will be stored in our systems with any other information you provide and any transaction details.

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### **Sweepstakes**

On occasion, we conduct sweepstakes that entitle the winners to prizes. Each sweepstakes has its own terms and conditions. As part of entering a sweepstakes certain personal information such as name and email address will generally be required. We may use this information to send future communications about specials and offers.

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### **Careers**

We use third-party service providers that provide applications, tools, databases, or websites that assist us in collecting the personal information of individuals who wish to be considered for potential employment. The information you provide as part of your application for employment is accessible to MVWC and may be shared among MVWC, its Affiliates, and recruiters working on behalf of MVWC or its Affiliates for the purpose of managing your application for employment, including administering the application, arranging interviews, applicant selection, scoring, assessment, issuing offers to successful candidates, and to comply with legal and regulatory requirements. MVWC uses the information provided for its

(a) legitimate interest in fully assessing applications to ensure that only appropriate candidates are assessed and selected and (b) legal obligations to comply with employment laws and other legal and regulatory requirements.

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### **Other Companies and Sites**

Our Websites may contain links to third party sites that might be of interest to you (such as airlines or car rental companies). We are only responsible for the privacy statement and content of our Websites. We are not responsible for, and have no control over, the privacy practices or data collection, use, disclosure, or security practices of any other company, such as airlines, car rental companies, Facebook, Google, or any other provider or website.

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### **Website Survey**

We value your input. If you choose, we welcome your participation in an online survey regarding the usefulness of our Websites. We will only use the information you provide for research and analysis, and possibly to contact you to address customer service matters.

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### **Region-Specific Website and Privacy Elements**

Our Websites are generally operated from the United States in accordance with laws of the United States and visitors to our Websites should be aware that the laws of the United States may differ from those of your country of residence.

#### **Australia**

Where personal information has been collected about you by an Affiliate that is incorporated in Australia, you are entitled to access the information we hold about you. You can do this by making a request for access to our Privacy Officer using the contact details set out on the first page of this Statement.

If information we hold about you is incorrect, we would like to know so that we can promptly correct this. You have a right to seek the correction of incorrect information we hold about you. In certain situations, we may not agree to a request to correct information we hold about you. If this occurs, we will advise you of this and our reason for not agreeing to the correction request.

If you want to make a complaint about our handling of personal information about you, we ask that you contact us as a first step. We will then follow our internal Compliant Handling Process to seek to address and resolve your complaint. You can contact us to lodge a complaint using the contact details for our Privacy Officer set out on the first page of this Statement.

If, for any reason, your complaint remains unresolved, you may refer the matter to the Office of the [Australian Information Commissioner \(OAIC\)](#). The contact details for the **OAIC** are:

The Office of the Australian Information Commissioner  
GPO Box 2999  
Canberra ACT 2601  
Australia  
Phone: 1300 363 992  
Fax: 02 9284 9666  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)

#### **European Economic Area (EEA) and Switzerland**

For residents of the **European Economic Area (EEA)**, the following additional privacy elements apply to you:

We are committed to protecting your privacy and will only use your personal information in accordance with applicable data protection legislation, including the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) and implementing legislation.

Lawful Basis for Processing Personal Information

The lawful basis for our collection and use of your personal information described in this Statement is that the processing is (i) necessary for our legitimate interests in carrying out our business, provided those interests are not outweighed by your rights and interests; (ii) necessary to perform a contract with you; (iii) necessary to comply with a legal obligation; or (iv) based, when necessary, on your consent.

#### Cookies & Related Technologies

When you visit our Websites, you will be asked to consent to cookies, which are described in this Statement and the Table.

#### Disclosure and Cross-Border Transfer

Personal information that is shared with third parties as described in this Statement is done pursuant to contracts that include the requisite protections under the GDPR.

We are a global company, and your personal information will be shared among us and transferred outside of your country of residence. In accordance with GDPR, personal information that is transferred outside of the European Economic Area is done under data transfer agreements that contain standard data protection clauses adopted by the European Commission that provide safeguards for such transfers or legally recognized certifications, such as Privacy Shield.

#### Special Categories of Data

We request that you do not send to us (unless we specifically request) any Special Categories of Data, which is defined under the GDPR as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric characteristics, health, or sexual orientation.

#### How to Contact Us Concerning Your Personal Information

If you do not want us to use your personal information for our direct marketing purposes, you may write to us at any time, and we will cease using the information for such purposes at no charge to you. Please send your request to [mvciptout@mvmc.com](mailto:mvciptout@mvmc.com).

If you would like to request access to your personal information; to rectify such information when it is inaccurate or incomplete; to cancel or delete your personal information; to oppose the use your information for a specific purpose; or to revoke consent previously granted to the extent permitted by law, please contact us at [privacy@mvmc.com](mailto:privacy@mvmc.com) or by mail:

Marriott Vacations Worldwide Corporation  
Attn: Privacy Office  
6649 Westwood Blvd.  
Orlando, FL 32821  
United States of America

We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any matters related to the use and disclosure of your personal information.

#### **Hong Kong**

For residents of **Hong Kong**, the following additional privacy elements apply to you:

Our Websites do not collect personal information from your computer or mobile device when you browse and request pages from our servers. This means that, unless you voluntarily and knowingly provide us with personal information, we will not know your name, your email address, or any other personal information. When you request a page from our Websites, our servers log the information provided in the HTTP request header including the Internet Protocol (IP) address, the time of the request, the URL of your request and other information that is provided in the HTTP header. We collect the HTTP request header information in order to make our Websites function correctly and provide the functionality that you see on our Websites. We also use this information to understand how visitors use our Websites and to permit us to adjust its contents and functionality to meet their needs.

When you visit our Websites, our server software records the domain name of your computer and its IP address. We may also track the pages you visit within our sites. We do these things so that we may measure website traffic, gauge the popularity of various parts of our Websites, gain some general knowledge about your preferences and compile aggregated statistics to improve the visitor's experience.

Data that we collect is used only for the purposes indicated within this Statement or as stated within materials you receive requesting your consent. We utilize your personal information for purposes, which include, but are not limited to:

- To better service your account and preferences by keeping you informed of your account status and activities through printed or electronic statements;
- To process payments that you elect to make online;
- To assess your entitlement to benefits;
- To collect and process charges you incur in our facilities;
- To offer you additional products and services;
- To send periodic satisfaction or market research surveys.

Personal information will not be disclosed to any third party except as noted below:

- On a confidential basis to trusted affiliates in the ordinary course of our business, such as for data management and distribution of our promotional materials;
- As we may be required to disclose by law;
- To process payments that you elect to make online;
- As you indicate your choice to receive promotional materials from third parties within forms you receive.

If you wish to opt-out of our direct marketing communications you receive, please send an email to [mvcioptout@mwwc.com](mailto:mvcioptout@mwwc.com) or send a letter to the postal address within the Introduction section of this Statement.

Please note that sweepstakes or similar promotions offered to residents of Hong Kong will only occur in accordance with Hong Kong laws.

If you have any questions or privacy concerns, please send an email to [privacy@mwwc.com](mailto:privacy@mwwc.com) or send a letter to the postal address within the Introduction section of this Statement.

## **Malaysia**

For residents of Malaysia, the following additional privacy elements apply to you:

MVWC, its Affiliates, and its successors collect and maintain data, including your personal details (provided by you voluntarily on an MVWC or Affiliate website or otherwise, in connection with a marketing event or purchase transaction, as a member of the Marriott Rewards Program or otherwise), such as name, address, telephone and facsimile numbers, email addresses, occupation, government-issued ID number, nationality, and passport number, in databases controlled by MVWC, its Affiliates, or any service providers and third parties (including auditors) engaged by MVWC, its Affiliates, or any successors, in Singapore, Hong Kong, the United States, or elsewhere and your providing personal information shall be deemed to be your consent to the processing, use, transfer, and disclosure of such data by MVWC to and/or by its Affiliates worldwide.

## **Mexico**

For residents of Mexico, the following additional privacy elements apply to you:

Data Controller  
Promociones Marriott, S.A. de C.V.  
Andres Bello No. 29  
Polanco, Mexico City 11560  
Mexico

Promociones Marriott, S.A. de C.V. is an affiliate of MVWC (MVWC and Promociones Marriott, S.A. de C.V. are collectively referred to as "MVWC" in this Statement).

### **Use of Your Information**

Personal data that we collect is used only for the purposes contained in the Information We Collect and Its Uses section of this Statement or as stated within materials you receive, including, but not limited to:

- To better service your account and preferences by keeping you informed of your account status and activities through printed or electronic statements;

- To process payments that you elect to make online;
- To assess your entitlement to benefits;
- To collect and process charges you incur in our facilities;
- To offer you additional products and services; and
- To send periodic satisfaction or market research surveys.

In accordance with the Federal Law on Protection of Personal Data Held by Private Parties and its accompanying regulations, you consent to the processing of your personal data in accordance with the provisions of this Statement unless you express your objection in the manner provided for under the Your Rights section of this Statement. We may process financial or asset information to provide you with our products and services for the purpose of fulfilling obligations under a legal relationship between you and us.

#### Options to Limit the Use of Your Information

If you wish to opt-out of our direct marketing communications you receive, please send an email to [mvciptout@mvlc.com](mailto:mvciptout@mvlc.com) or send a letter to the postal address within the Introduction section of this Statement.

#### Your Rights

You have 5 (five) days after this Statement has been brought to your attention to refuse to allow the processing of your personal information for purposes that are different than those that are necessary and create a legal relationship between you and us; otherwise, you are deemed to have consented to such processing. You also have the right to access your personal information; to rectify such information when it is inaccurate or incomplete; to cancel or delete your personal information; to oppose the use your information for a specific purpose; or to revoke consent previously granted to the extent permitted by law. If you cancel or revoke our ability to use certain personal information, we may not be able to provide certain goods and services to you.

To exercise any of the rights described above, please send an email to our Privacy Officer via [privacy@mvlc.com](mailto:privacy@mvlc.com). You must include in the email (a) your full name, (b) your contact information, including your mailing address, email address, and telephone number; (c) the right you wish to exercise; (d) proof of your identity or your legal representative; and (e) any other information, item or document that will assist us in locating your personal data.

We will respond to your request within 20 (twenty) days after receipt of your request and verification of your identity or any longer period permitted by law. We may contact you (i) to request additional information from you if we are not able to verify your identity from the information you provide in your email request; (ii) to inform you of the timeframe within which you will receive a response to your request; (iii) to provide you with directions on how you must submit your request, including the forms you can use to submit your application, if any, and; (iv) to inform you about how we will deliver to you the information you requested (which usually would be copies of documents or information).

#### Data Transfers

We may transfer your personal data as provided for in the Disclosure of Information to Third Parties section of this Statement. Such transfer is among affiliates of MVWC, including Promociones Marriott, S.A. de C.V., to third parties who are necessary for providing our goods and services to you, to affiliates of MVWC or third parties that are necessary pursuant to our legal relationship with you. We will seek your consent when required if such transfer is not for the stated purposes identified in this Statement.

#### Changes or Updates

We reserve the right at any time to modify or update this Statement. You can verify whether this Statement has been changed or updated by referencing the updated revision date, which is contained in the Privacy Statement Changes section of this Statement. Changes or updates to this Statement are effective as of last updated date. Your continued use of our Websites or our products or services after last updated date of this Statement represents your consent to any changes or updates to this Statement.

#### Singapore

For residents of Singapore, the following additional privacy elements apply to you:

Our Websites do not collect personal information from your computer or mobile device when you browse and request pages from our servers. This means that, unless you voluntarily and knowingly provide us with personal information, we



will not know your name, your email address, or any other personal information. When you request a page from our Websites, our servers log the information provided in the HTTP request header including the Internet Protocol (IP) address, the time of the request, the URL of your request and other information that is provided in the HTTP header. We collect the HTTP request header information in order to make our Websites function correctly and provide the functionality that you see on our Websites. We also use this information to better understand how visitors use our Websites and to permit us to adjust its contents and functionality to meet your needs.

Your providing personal information shall be deemed to be your consent to MVWC, its Affiliates and its successors to the collection, use, processing, disclosure, and transfer of such information as described in this Statement or as stated within materials you receive requesting your consent. Data that we collect is used only for the purposes indicated within this Statement or as stated within materials you receive requesting your consent. We will protect your personal data in accordance with the Personal Data Protection Act 2012 (No 26 of 2012). The use and transfer of your personal data may result in your data being transferred outside of the location in which it is collected to the United States or other jurisdictions. If your data is transferred outside of the location in which it is collected, we will protect your personal data in accordance with a standard comparable to the protection under the PDPA.

By continuing to use our Websites, you agree to our placing cookies on your computer in order to analyze the way you use our Websites, provide you with enhancements and customized content and improve your browsing experience while on our Websites. Please view our [Cookies and Related Technologies Table](#) for more details about the information we collect when you use any of our Websites.

If you do not wish to accept cookies in connection with your use of our Websites, you must disable the acceptance of cookies within your browser or stop using our Websites. Note, if you disable the use and acceptance cookies within your browser, many features and benefits within our Websites, and other websites across the Internet, will no longer be available to you.

If you have any questions relating to our collection, use, or disclosure of personal data, privacy concerns or would like to make corrections to personal data you have shared with us, please contact Simona Chan at 65 6877 6118 during regular Singapore business hours at [simona.chan@vacationclub.com](mailto:simona.chan@vacationclub.com) or send a letter to:

MVCI Asia Pacific Pte. Ltd.  
8 Temasek Blvd.  
#09-01/02 Suntec Tower 3  
Singapore 038988  
Attn.: Data Protection Officer

### **People's Republic of China (PRC)**

We do not collect personal sensitive information directly from people with limited capacity for civil conduct and those with incapacity for civil conduct, such as minors under the age of 16. If indeed necessary, personal sensitive information of such subjects shall be collected after acquiring expressed consent from the legal custodian of the said people.

You consent and allow MVWC and its Affiliates and successors to collect and maintain data, including your personal details (provided by you voluntarily on our Websites, in connection with a marketing event or purchase transaction, as a member of the Marriott Rewards Program or otherwise), such as name, address, telephone and facsimile numbers, email address(es), occupation, government issued ID number, nationality and passport number, in databases controlled by us and/or any service providers and third parties (including auditors) engaged by MVWC, its Affiliates or any successors, in Singapore, Hong Kong, the United States or elsewhere, and consent to the processing, use, transfer and disclosure of such data by us to and/or by its Affiliates world-wide and to their agents and partner companies, to: verify your identification; complete any purchase transaction; administer your Club Membership; send commercial messages (to your address, email, telephone number or otherwise); advise you of other offers and information; carry out general record keeping and maintain a list of current and former Club Members; create informational or analysis reports; supplement your disclosed information; carry out verifications, mailhouse, planning or other legitimate business needs in connection with the improvement of the Club membership experience, the provision of related services and the management thereof; allow for revenue collection or debt recovery; respond to queries by you or others who have been identified by you as your authorized representative or proxy; and such other purposes as permitted by applicable law. MVWC, its Affiliates and its successors shall permit third parties to have, process, use and disclose your data only for purposes as necessary to assist MVWC, its Affiliates and its successors to achieve the foregoing. We will protect your details in accordance with applicable data protection laws. The use and transfer of this information may result in personal data being transferred outside of the location in which it is collected to the United States, Singapore and other jurisdictions. We will protect your details in accordance with applicable data protection laws and shall take steps to ensure any transferees do the same.

## United States

For residents of the United States, the following additional privacy elements apply to you:

If you receive an email that looks like it is from us, but asks you for your credit card or social security number, it is a fraudulent email or "phish." We recommend that you do the following:

- Forward the email to the U.S. Federal Trade Commission at [spam@uce.gov](mailto:spam@uce.gov) or call 1-877-FTC-HELP (1-877-382-4357) to report it. The FTC uses the spam stored in this database to pursue law enforcement actions against people who send deceptive email.
- Delete the email.

At this time, we do not respond to browser 'do not track' signals, as we await the work of interested stakeholders and others to develop standards for how such signals should be interpreted. Third parties, including our service providers, may collect information about your online activities over time and across different websites, including when you visit our Websites. You can learn more about what information we collect by visiting our [Cookies and Related Technologies Table](#).

If you are a customer who resides in the State of California, you have the right to request, from us, a list of third parties with whom we shared personal information about you for their own direct marketing purposes during the previous calendar year. However, we do not permit personal information that is shared with third parties to be utilized for their marketing activities. Any third party with which your personal information is shared is required to maintain adequate policies and controls in order to protect such information.

If you have any questions or privacy concerns, please send an email to [privacy@mwwc.com](mailto:privacy@mwwc.com) or send a letter to the postal address within the Introduction section of this Statement.

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### Privacy Statement Changes

In the future, we may need to change this Statement. All changes will be made here so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone. This Statement was last updated on May 21, 2019.

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