

LARICA GROUP PRIVACY STATEMENT

DATA COVERED BY THIS PRIVACY STATEMENT

This Privacy Statement describes the privacy practices of the LaricaGroup for data that we collect:

- through websites operated by us from which you are accessing this Privacy Statement, including Marriott.com and other websites owned or controlled by the LaricaGroup (collectively, the **Websites**);
- through the software applications made available by us for use on or through computers and mobile devices (the **Apps**);
- through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our **Social Media Pages**);
- through email messages that we send you that link to this Privacy Statement and through your communications with us online or in person;
- from third parties such as **Authorized Licensees, Owners and Franchisees**, and Other Sources, such as public databases, marketing partners and other third parties; and

Collectively, we refer to the **Websites**, the **Apps**, and our **Social Media Pages**, as the “**Online Services**” and, together with the **Property Visits and Offline Interactions**, the “**Services.**”

THE DATA WE COLLECT

At touch points throughout your guest journey, we collect Personal Data in accordance with the law, and to serve you better. **Personal Data** is information that may identify you as an individual or relate to you as an identifiable individual. We collect and process the following types of Personal Data about you:

- Name
- Gender
- Postal address
- Telephone number
- Email address
- Financial information (such as credit and debit card number or other payment data)
- Language preference
- Date and place of birth
- Nationality, passport, visa, or other government-issued identification data
- Important dates: birthdays, anniversaries, and special occasions
- Membership or loyalty program data (including co-branded payment cards, travel partner program affiliations)
- Employer details (for business-related bookings)
- Travel itinerary, tour group, or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests
- Social media account ID, profile photo and other data publicly available, or data made available by linking your social media and loyalty accounts

In more limited circumstances, we may also collect:

- Data about family members and companions, names, and ages of children
- Biometric data

- Images, video and audio data via: (a) security cameras located in public areas, such as hallways and lobbies, in our properties; and (b) body-worn cameras carried by our loss prevention officers and other security personnel

We may also collect information about your **Preferences** that we use to make your current and future stays and experience with us more enjoyable, including information about your interests and other relevant information that we learn about you during your stay. This may also include any likes and dislikes about our services that you tell us about so that we can improve our services, and specific dietary, health restrictions or personal needs to ensure your wellbeing. We may also collect your “**Personal Preferences**,” that may include details of your special anniversaries (such as your birthday or wedding anniversary), what type of activities you prefer to take part in when staying with us, and your hobbies. Personal Preferences may also include details about who you usually travel with, their relationship to you, and your marital status.

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

COOKIES AND OTHER DATA

We may also collect “**Other Data**” that generally do not reveal your specific identity or do not directly relate to an identified individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data. Other Data include:

- **Your browser or device.** We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Apple), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this data to ensure that the Online Services function properly.
- **Analytics.** We collect data through Google Analytics and Adobe Analytics, which use cookies and technologies to collect and analyze data about use of the Services. These services collect data regarding the use of other websites, apps, and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/ and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>. You can learn more about Adobe and opt out by visiting <http://www.adobe.com/privacy/opt-out.html>.
- **Aggregated and Segmented Data.** We may aggregate data that we collect, and this aggregated data will not personally identify you or any other user. We may also use both Personal Data and Other Data to divide customers into segments, or groups, in order to provide more relevant advertising.

HOW AND WHERE WE COLLECT YOUR DATA

This Privacy Statement describes the privacy practices of the LaricaGroup for Personal and Other Data that we collect through the following:

- **LaricaGroup.** We collect Personal Data and Other Data from other companies within the [Larica Group](#) for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the loyalty programs and to accomplish our business purposes.
- **Owners, Franchisees & Joint Ventures.** We collect Personal Data and Other Data from Owners of Larica Group branded properties that we manage, from Franchisees of Larica Group branded properties that are independently owned and operated under a franchise agreement with us, and from Joint Venture Partners. Owners and Franchisees are

independent from the Larica Group. Franchisees include their third party operators and management companies.

- **Authorized Licensees.** We collect Personal Data and Other Data from companies when we enter into a license or similar agreement to sell goods and services under a Larica Group brand (“Authorized Licensees”). Authorized Licensees are independent from the Larica Group.
- **On-Property and/or Travel Providers.** We may collect your Personal Data and Other Data from spa, restaurant, health club, concierge, and other outlets at our properties.
- **Linked Accounts.** We collect Personal Data and Other Data when you use your loyalty program number or Online Services login to receive or register for certain third party services. These companies include businesses such as airlines and rental car providers, and restaurant reservation and car services partners. Additionally, your social media account provider allows you to connect your social media account to your Online Services account or log into your Online Services account from your social media account. When you enroll in those services, we disclose your Personal Data and Other Data to those third parties. If you do not want us to collect your Personal Data or Other Data in this way, do not provide your loyalty program number to third parties, do not use your Online Services login to register for third-party promotions and do not connect your Online Services account with accounts on third-party services.
- **Promotional Activity.** We collect Personal Data and Other Data from with third parties who may provide promotions to you, such as sweepstakes, contests, or other offers.
- **Other Sources & Service Providers.** We collect Personal Data and Other Data from various third parties, such as public databases, joint marketing partners and online travel agencies (OTAs).
- **Online Services.** We collect Personal or Other Data when you interact with our Online Services, by performing such actions as, but not limited to, browsing, making a reservation, purchasing goods and services from our Websites or Apps, communicating with us or otherwise connecting with us or posting to social media pages, or signing up for a newsletter or participating in a survey, contest or promotional offer.
- **Customer Care Centers.** We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax, or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
- **Internet-Connected Devices.** We collect Personal and Other Data from internet-connected devices available in our properties. For example, when you connect a device to the hotel’s internet, or when a smart home assistant may be available for your use to tailor your accommodations and experience.

WHY WE COLLECT YOUR DATA (LEGAL BASIS)

PURPOSE	DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE	LEGAL BASES
Booking & Guest Registration	There are a number of activities associated with this purpose, such as: facilitating reservations and bookings of hotel accommodations and related services; engaging in pre-arrival communications (logistics, changes, preferences, etc.); and processing payments and security deposits.	Performance of contract for the individual with the guest booking the room Legitimate interests for the individual booking the room, for example, honoring his/her preferences, as well as for any individuals accompanying the primary guest (e.g., spouse,

PURPOSE**DESCRIPTION OF ACTIVITIES
ASSOCIATED WITH PURPOSE****LEGAL BASES**

children, friends)

Legal obligations relating to financial transactions, such as the obligation to maintain books and records

On-Site Reception & Stay Services

There are a number of activities associated with this purpose, such as: facilitating check-in and check-out; processing payments; providing consistent and personalized service and advice about the on-site services (based on past usage or expressed preferences); providing concierge, luggage storage and parking services; making arrangements with third-party providers on behalf of guests (such as coordinating tours and other sightseeing excursions; arranging taxi, shuttle and chauffeur services; and facilitating reservations and bookings at restaurants and events); administering and facilitating access to Wi-Fi, TV and other connectivity services (including access to business center amenities, such as fax and photocopying services) and entertainment systems (such as PlayStations and music players); facilitating in-room dining (including taking into account any dietary, health restrictions or other personal needs expressed by the guest); housekeeping services (including preferences for special pillows, duvets and other amenities expressed by the guest) and dry-cleaning services; handling customer requests, inquiries and complaints; and determining eligibility for age-restricted goods and services (such as alcohol or in-room adult entertainment).

Performance of contract, such as processing payments

Legitimate interests, such as honoring the guest's preferences (e.g., for a room near the elevator or on a top floor)

Consent, such as collecting information regarding dietary preferences that the guest chooses to provide

Legal obligations, such as collecting national ID numbers where legally required

Conferences & Events

There are a number of activities associated with this purpose, such as: communicating with customers about conferences and other event planning

Performance of contract, such as collecting information regarding a planned Event

PURPOSE**DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE****LEGAL BASES**

("Events"); facilitating reservation and bookings of Events; engaging in pre Event communications (logistics, accommodations, changes, etc.); preparing for and coordinating Events in accordance with customer instructions, expectations and preferences; facilitating catering; communicating about billing and recovering amounts owed; processing payments and security deposits; performing credit checks; handling customer requests, inquiries and complaints; and communicating with participants during Events.

Legitimate interests, such as responding to customer complaints or concerns relating to an Event

Legal obligations relating to financial transactions, such as the obligation to maintain books and records

Larica Operations & General Business

There are a number of activities associated with this purpose, such as: administering customer-care services to facilitate and address inquiries, comments and complaints about any of our services (such as in person, through phone lines, email, or on social media); handling security and fraud prevention; administering online services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and the hosting of data); monitoring and analyzing usage of services and using data analytics to improve services, marketing, programs, overall customer experience, gathering feedback, carrying out pilot programs for potential new services and both developing new and improving existing services; and facilitating mergers, acquisitions and other reorganizations and restructurings of our business (including prospective transactions).

Performance of contract, such as ensuring that online services are functioning so that individuals can make reservations or manage loyalty accounts

Legitimate interests, such as responding to customer complaints and concerns which may include, where applicable law permits, recording customer service calls

Consent, such as for marketing programs

Legal obligations relating to financial transactions, such as the obligation to maintain books and records

Emergency & Incident Response

There are a number of activities associated with this purpose, such as: ensuring the security of on-site services; responding to, handling and documenting on-site accidents and medical and other emergencies

Performance of contract, such as ensuring the safety of guests and personnel through interactions with on-site security personnel

PURPOSE**DESCRIPTION OF ACTIVITIES ASSOCIATED WITH PURPOSE****LEGAL BASES**

(including facilitating in-house doctor services); actively monitoring properties to ensure adequate incident prevention, response and documentation (including CCTV); requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via SMS, email, call, audio-visual device prompts, etc.).

Legitimate interests, such as monitoring properties through CCTV to ensure the safety of guests and personnel

Legal obligations, such as documenting on-site accidents

Individuals' vital interests, such as contacting medical or emergency services for an ill guest

Legal & Compliance

There are a number of activities associated with this purpose, such as: complying with applicable laws; complying with legal processes; responding to requests from public and government authorities; meeting national security or law enforcement requirements; enforcing our terms and conditions; protecting our operations; protecting the rights, privacy, safety, or property of the Larica Group, guests, visitors and other relevant individuals; and allowing us to pursue available legal remedies and limiting the damages that Larica may sustain.

Legal obligations, such as complying with legal processes

Legitimate interests, such as enforcing terms and conditions to protect trademarks

Individuals' vital interests, such as contacting emergency services in case of disturbances and incidents involving guests

Spa, Beauty, Golf, & Fitness Services

There are a number of activities associated with this purpose, such as: facilitating reservations and bookings; determining eligibility for services; honoring disability or other health-related restrictions and providing appropriate and safe activities, services and treatments; providing consistent and personalized service based on past usage and preferences expressed by the individual; processing payments; arranging requested professionals for specific treatments and services; and handling customer requests, inquiries and complaints.

Performance of contract, such as processing payments

Consent, such as collecting information about back problems when providing massage services

Legitimate interests, such as providing personalized services (e.g., offering golfing opportunities based on past activity)

Legal obligations relating to financial transactions, such as the obligation to maintain books and records

PURPOSE

**DESCRIPTION OF ACTIVITIES
ASSOCIATED WITH PURPOSE**

LEGAL BASES

Food & Beverage
Services

There are a number of activities associated with this purpose, such as: facilitating reservations; honoring dietary preferences; providing consistent and personalized service based on past usage and preferences expressed by the individual; processing payments; arranging reservations; and handling customer requests, inquiries, and complaints.

Individuals' vital interests (e.g., when an individual becomes ill while using the fitness equipment)

Performance of contract, such as processing payments

Consent, such as collecting information about dietary, health restrictions, or personal needs of a guest when ordering food

Legitimate interests, such as providing personalized services (e.g., offering red wine to a guest based on previous requests)

Legal obligations relating to financial transactions, such as the obligation to maintain books and records

Individuals' vital interests (e.g., when an individual becomes ill in one of the restaurants)

Child-Related Services
(for Parents & Legal
Guardians)

There are a number of activities associated with this purpose, such as: facilitating babysitting/hotel nanny, kids club and junior golf program services; facilitating reservations and bookings; preparing for and coordinating hotel accommodations and services in accordance with guest preferences, instructions and expectations; payment and billing services; dining services (for example, special menus for children or special discounts for breakfast for children under a certain age).

Performance of contract, such as having a child of a certain age stay in the room with his/her parents may amount to extra charges or discounts

Consent of parent or legal guardian, such as accommodating needs of children

Legitimate interests, such as providing a crib or child-sized bathrobes and other amenities for children

Legal obligations relating to financial transactions, such as the obligation to maintain

PURPOSE**DESCRIPTION OF ACTIVITIES
ASSOCIATED WITH PURPOSE****LEGAL BASES**

books and records

Individuals' vital interests, such as when a child becomes ill while participating in kids' club

Loyalty Programs,
Accounts, & Relationship
Management

There are a number of activities associated with this purpose, such as: registering users in loyalty and other client account programs and payment card programs; determining eligibility for various programs and related services; administering loyalty programs; providing consistent and personalized service based on past usage and the preferences expressed by members; ensuring access to Online Services; processing payments; notifying members about changes to programs, terms and conditions; and handling members' requests, inquiries and complaints.

Performance of contract, such as assessing points and distributing benefits

Consent, such as honoring the mode of communication preferences (e.g., email, SMS)

Legitimate interests, such as managing members' choices regarding how they wish to earn, track, and use points

Legal obligations relating to financial transactions such as the obligation to maintain books and records

Marketing, Promotions,
Contests & Third Party
Products

There are a number of activities associated with this purpose, such as: communicating about products and services that may be of interest to guests; providing personalized advertisements for products and services on selected websites; facilitating participation in sweepstakes, contests and other promotions (such as best vacation photo contests on social media); and handling customer requests, inquiries and complaints.

Performance of a contract, such as fulfilling obligations associated with a contest

Consent, such as honoring the mode of communication preferences (e.g., email, SMS)

Legitimate interests, such as providing advertisements for similar products and services

Legal obligations, such as handling information consistent with rules relating to sweepstakes

MORE INFORMATION ABOUT YOUR PERSONAL PREFERENCES

Our goal is to serve you better and meet your expectations and preferred level of hospitality at each stage, from the moment that you book with us through to when you check out. See below to learn more.

PERSONAL PREFERENCES

PURPOSES

LEGAL BASES

Anniversaries

When you stay with us, we want to help you celebrate any special occasion, such as an anniversary, birthday. For example, we may make a note of these dates to allow us to provide you with a birthday or anniversary gift.

Consent, where applicable

Activity type and hobbies (such as trips to beach, babysitting, fitness, travel and transportation details, kids club theater, restaurant etc.)

We want to ensure that we provide you with services that enhance your Larica experience. To do this, we may retain your preferences about the types of activities that you like to take part in, so that we can ensure we are able to offer you similar experiences when you stay with us in the future.

Consent, where applicable

Relationships (husband, wife, son, daughter, etc.)

We understand that your Preferences may change depending on who you are traveling with (such as your preferred room type). We may keep a record of your relationships to assist us with making your Larica stay as comfortable as possible. For example, if we know you are traveling with small children, we can proactively plan for additional accommodations such as a crib or roll-away bed.

Legitimate interest, in order to provide you with exceptional service

Consent, where applicable

Preferences for properties, clubs, and facilities

When you are staying with us, we want to make sure that we can provide you with services to enhance your Larica experience. To do this, we may retain your preferences for our properties, clubs, and facilities, based on your past stay preferences, of our kids' clubs, nanny services, spa and beauty services, golf, restaurant, and fitness facilities.

Legitimate interest, in order to provide you with exceptional service

Consent, where applicable

Dietary preferences

When you stay with us, we want to ensure that you are safe, that we are looking after your wellbeing, and to provide you with services to enhance your Larica experience. For example, we may make a note of your dining or beverage preferences so that we are prepared if you request room service or dine at one of our cafes or restaurants.

Legitimate interest, in order to provide you with exceptional service

Consent, where applicable

HOW AND WHEN WE SHARE YOUR DATA

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we may share Personal Data and Other Data with the following:

- **Larica Group.** We disclose Personal Data and Other Data to other companies within the [Larica Group](#) for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the loyalty programs and to accomplish our business purposes. We share your Personal Data and Other Data used for making reservations with the applicable property and Larica entity to fulfill and complete your reservation.
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- **On-Property and/or Travel Providers.** We may share your information with spa, restaurant, health club, concierge and other outlets at our properties to provide you with services and their own marketing such as with Disney Destinations, LLC and Walt Disney Travel Company when you stay at one of our properties affiliated with Walt Disney World®. This sharing also enables us to provide you with a single source for purchasing packages that include travel-related services, such as airline tickets, rental cars, and vacation packages.
- **Linked Accounts.** We partner with certain third parties that allow you to enroll in their services. For example, certain companies allow you to use your loyalty program number or Online Services login to receive or register for their services. These companies include businesses such as airlines and rental car providers, and restaurant reservation and car services partners. Additionally, your social media account provider allows you to connect your social media account to your Online Services account or log into your Online Services account from your social media account. When you enroll in those services, we disclose your Personal Data and Other Data to those third parties. If you do not want us to share your Personal Data or Other Data in this way, do not provide your loyalty program number to third parties, do not use your Online Services login to register for third-party promotions and do not connect your Online Services account with accounts on third-party services. Data shared in this way will be governed by the third party's privacy policy and not this Privacy Statement.
- **Promotional Activity.** We partner with third parties who may provide promotions to you, such as sweepstakes, contests, or other offers..
- **Service Providers.** We disclose Personal Data and Other Data to third party service providers including, for example, companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, and other services.

Other Uses and Disclosures:

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations, such as in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Larica Group business, assets or stock (including any bankruptcy or similar proceedings); (f) to protect the rights, privacy, safety or property of the Larica Group, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law.

YOUR DATA, YOUR CHOICES: YOUR PRIVACY PREFERENCES & RIGHTS

At Marriott, we believe that you should have choices with respect to your data. We provide you with the options, information, and choices below to express your preferences: what and how much you share with us and when and how you hear from us.

Communications and Preferences

- To change how and how often, we or our partners communicate with you, please sign into your loyalty account profile and select [Communication Preferences](#).
- You can also use the unsubscribe link at the bottom of any of our communications.
- If you no longer wish to receive marketing-related emails, you may opt out by visiting our [unsubscribe page](#) or by following the instructions in any such email you receive from us.
- **NOTE:** Even if you choose to opt out of marketing-related emails, we will continue to send you transactional messages, such as information about your reservations or stays, including confirmation and pre-arrival emails, or account security updates.
- If you want to adjust your Stay Preferences, log into your loyalty account, and choose Room Options, Stay Preferences.

Cookies and Other Data

For information on your choices related to Cookies and Other Data, please see the Section on [Cookies and Other Data](#), above.

How You Can Request to Access, Change, Delete, Restrict the Use or Object to the Processing of Your Personal Data

If you would like to request to access, change, delete, restrict the use of, or object to the processing of your Personal Data that you have previously provided to us, or if you would like to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent these rights are provided to you by law), please visit our Individual Rights Portal and complete [this form](#). If you have any questions about the form or our process, feel free to contact us any time.

Please see also, **Contact Us**.

For your protection, we only fulfill requests for the Personal Data associated with the email address and/or loyalty account number that you identify in your request, and we may need to verify your identity before fulfilling certain requests. When permitted by law, we may charge an appropriate fee to cover the costs of responding to your request.

Larica acknowledges and respects our guests' privacy and we will try to comply with your request as soon as reasonably practicable and consistent with applicable law.

OTHER IMPORTANT PROVISIONS

Non-LaricaGroup Entities

This Privacy Statement does not address, and we are not responsible for the privacy, data, or other practices of any entities outside of the LaricaGroup, including Franchisees, Owners, Homes and Villas Property Management Companies, Authorized Licensees, Strategic Business Partners, or any third party operating any site or service to which the Services link, payment service, loyalty program, or website that is the landing page of the high-speed Internet providers at our properties. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We generally have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data.

In addition, we are not responsible for the data collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless

service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or the Apps or our social media pages.

Security

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "[Contact Us](#)" section, below.

Retention

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services)
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations)

Sensitive Data

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (*e.g.*, social security number, taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).

Use of Services by Minors

The Services are not directed to individuals under the age of sixteen (16), and we request that they not provide Personal Data through the Services.