

## CALIFORNIA CONSUMER PRIVACY STATEMENT

This California Consumer Privacy Statement section (“California Privacy Statement”) applies solely to individuals, visitors, users, and others who are residents of the State of California (“consumers” or “you”) and describes our policies and practices regarding the collection, use, and disclosure of personal information we collect about you, including personal information you submit or we obtain when you access or use the Site or the Services or through other channels. This section does not apply to personal information we collect about you as a job applicant to, an employee of, owner of, director of, officer of, or contractor of the Company. This section also does not apply to personal information we collect about you as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency when your communications or transactions with the Company occur solely within the context of the Company conducting due diligence regarding, or providing or receiving a product or service to or from, such company, partnership, sole proprietorship, non-profit, or government agency.

This California Privacy Statement is adopted to comply with the California Consumer Privacy Act, as amended (“CCPA”). Any terms defined within the CCPA have the same meaning when utilizing within this California Privacy Statement. Please read this carefully.

**Changes to this California Privacy Statement.** By using the Sites and the Services, you signify your acceptance of the terms of this California Privacy Statement. If you do not agree to this California Privacy Statement, please do not use the Sites or Services. We reserve the right to change this California Privacy Statement at any time. Changes will be effective immediately upon posting to the Site and will apply to your use of the Site and the Services and the Company’s practices concerning personal information after the “Effective Date” listed above. Your use of the Services or Sites following these changes means that you accept the revised California Privacy Statement.

**Personal Information That We Collect.** This notice describes the categories of personal information (“PI”) we collect, have collected, or will collect through the Sites or in the course of our business, including providing Services, in the preceding 12 months and the purposes for which such PI may be used. Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services and products we provided to you, we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category for all of our customers.

Categories of Personal Information Collected	Examples	Purposes For Which Personal Information is Used
Identifiers and Contact information.	A real name, alias, postal address, unique personal identifier, online	Providing goods and services Legal compliance & security

Categories of Personal Information Collected	Examples	Purposes For Which Personal Information is Used
	identifier, internet protocol address, email address, account name, driver’s license number, passport number, or other similar identifiers	Marketing and Advertising Auditing/Quality/Safety
Other elements.	Signature, physical characteristics or description, address, telephone number, employment, bank account number, credit card number, debit card number, or any other financial information	Providing goods and services Legal compliance & security Auditing/Quality/Safety
Characteristics of protected classifications under California or federal law.	Age (40 years or older), color, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions, veteran or military status	Legal compliance & security Auditing/Quality/Safety
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Providing goods and services Marketing and Advertising
Internet or other electronic network activity.	Browsing history, search history, a consumer’s interaction with an internet website, application, or advertisement	Legal compliance & security Marketing and Advertising
Geolocation data	Physical location or movements (geo-fencing)	Marketing and Advertising

Categories of Personal Information Collected	Examples	Purposes For Which Personal Information is Used
Audio, electronic, visual, thermal, olfactory, or similar information	Video surveillance	Legal compliance & security
Consumer profile or inferences drawn from other personal information.	Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Marketing and Advertising
Sensitive Personal Data.	An individual's Social Security, driver's license, state identification card, or passport number; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, or union membership; the contents of mail, email, and text messages unless Company is the intended recipient of the communication; genetic data; biometric information for the	Essential Business Functions  Legal Compliance

Categories of Personal Information Collected	Examples	Purposes For Which Personal Information is Used
	purpose of uniquely identifying an individual; Personal Data collected and analyzed concerning an individual's health; Personal Data collected and analyzed concerning an individual's sex life or sexual orientation; information collected from or about a known child	

The Company may add to the categories of PI it collects and the purposes it uses PI. In that case, the Company will inform you by posting an updated version of this California Privacy Statement on the Site.

**Exclusions from Personal Information.** PI does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like certain additional health or medical information and other categories of information protected by different laws.

**How We Collect Personal Information.** The ways in which we collect PI are the same as those listed above in the "How We May Collection Personal Information" subsection.

**How We Disclose the Personal Information that We Collect.**

Please see the above chart for the categories of PI collected and the business or commercial purposes for which they were collected.

The above categories of PI are disclosed to the following categories of third parties:

- **Hotel, Resort and Hospitality Companies.** We disclose PI and other data to hotel, resort and hospitality companies for the purposes described in this Privacy Statement, including to facilitate your stay at properties owned or managed by us, to administer loyalty programs, and to accomplish our business purposes.
- **Strategic Business Partners.** We disclose PI and other data with select Strategic Business Partners who provide goods, services and offers that enhance your experience at properties owned or managed by us or that we believe will be of interest to you. By sharing data with these Strategic Business Partners, we are able to make personalized

services and unique travel experiences available to you. For example, this sharing enables spa, restaurant, health club, concierge and other outlets at properties owned or managed by us to provide you with services. 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.

- **For external processing.** We provide PI to our affiliates, trusted businesses or partners, or vendors to process it for us based on our instructions and in compliance with our Privacy Statement and any other appropriate confidentiality and security measures. For example, we may use or disclose this information with these third parties for external processing as follows:
  - With your consent or as you direct;
  - To manage the Site;
  - To process payments and requests for products and services;
  - To provide you with products, services, or offers;
  - To coordinate your participation in our loyalty reward or similar programs;
  - To engage in marketing activities, such as sharing personal information with our partners to deliver advertisements to our shared customers;
  - To enhance our services by, among other methods, obtaining assistance with providing more personalized services to you through analytics and other technologies;
  - To protect our interests and legal rights, such as through responding to subpoenas and defending litigation; and
  - To protect against and prevent fraud, illegal activity (such as identifying and responding to incidents of hacking or misuse of our websites and mobile applications), and claims and other liabilities.

We do not disclose PI to third parties for their own marketing purposes.

- **For Legal Reasons.** We will disclose PI to companies, organizations or individuals outside of the Company if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
  - demonstrate our relationship with you.
  - meet any applicable law, regulation, legal process or enforceable governmental request.
  - enforce applicable Terms of Use, 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 the Company, our users or the public as required or permitted by law.

We attempt to notify users about legal demands for their PI when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

- **Business Transfers.** If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, PI about our users is often a transferred business asset. In the event that the Company itself or substantially all of our assets are acquired, PI about our users may be one of the transferred assets.
- **Aggregate Site Use Information.** We may disclose aggregate or anonymized/pseudonymized information with third parties in order to promote or describe use of the Sites, for research, marketing, advertising, or similar purposes.

We do not sell or share your personal information to third parties and we do not have actual knowledge that we have sold personal information of minors under age 16. With limited exceptions, we may use and disclose your sensitive personal information for purposes that, with limited exceptions, are necessary in order to provide products and services to you and which are reasonably expected by the average consumer.

The Company has disclosed for a business purpose the following categories of PI in the preceding 12 months:

1. Identifiers
2. Other Elements
3. Characteristics of protected classifications under California or federal law
4. Commercial information
5. Internet or other electronic network activity
6. Geolocation data
7. Audio, electronic, visual, thermal, olfactory, or similar information
8. Consumer profile or inferences drawn from other personal information

**California Consumer Rights.** Pursuant to the CCPA, and as detailed below, consumers have various rights with respect to their PI.

- **Right to Request Deletion.** You have the right to request that the Company delete your PI from the Company's records and direct any service providers to delete your PI from their records, subject to certain exceptions.

Upon receipt of a verifiable consumer request, the Company will delete and direct any service providers to delete your PI from its records.

The Company is not required to comply with your request to delete your PI if it is necessary for the Company (or its service provider) to maintain your PI in order to:

1. Complete the transaction for which the PI was collected, provide a good or service requested by you, or reasonably anticipated within the context of the Company's ongoing business relationship with you, or otherwise perform a contract between the Company and you.
  2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
  3. Debug to identify and repair errors that impair existing intended functionality.
  4. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
  5. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
  6. To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with the Company.
  7. Comply with a legal obligation.
  8. Otherwise use your PI, internally, in a lawful manner that is compatible with the context in which you provided the information.
- **Right to Request Information.** You have the right to request the Company disclose the following to you as it relates to the 12-month period preceding the Company's receipt of your verifiable consumer request:
    1. The categories of PI the Company has collected about you.
    2. The categories of sources from which the PI is collected.
    3. The business or commercial purpose for collecting or selling PI.
    4. The categories of third parties with whom the Company discloses PI.
    5. The specific pieces of PI the Company has collected about you.

Upon receipt of a verifiable consumer request, the Company will provide a response to your request for information.

- **Right to Correct.** You have the right to request that the Company corrects, updates or modifies any inaccuracies in your PI.
- **Right to Opt-Out of Sale, Targeted Advertising and/or Sharing.** You have the right to request to opt-out of the sale of your PI, which includes, but is not limited to, the sharing of your PI for targeted advertising purposes. To exercise this right please email [privacy@davidsonhospitality.com](mailto:privacy@davidsonhospitality.com) stating in the email that you are a resident of California and that you would like to opt-out of the sale or sharing of you personal information.
- **Right to Opt-Out of Automated Decision-Making, Including Profiling.** You have the right to request to opt-out of the use of your personal information in automated decision-making. To

exercise this right please email [privacy@davidsonhospitality.com](mailto:privacy@davidsonhospitality.com) stating in the email that you are a resident of California and that you would like to opt-out of the use of your personal information in automated decision-making.

- **Nondiscrimination.** We will not discriminate against you in violation of the CCPA for exercising any of your CCPA rights. For example, we generally will not provide you a different level or quality of goods or services if you exercise your rights under the CCPA. However, in certain instances we may be unable to provide the service requested (e.g., if you decline to provide your hotel rewards number, we will be unable to credit your stay to your rewards account.)

**Submitting California Consumer Rights Requests.** To submit any of the California Consumer Rights requests as outlined in this California Privacy Statement, please contact us at [privacy@davidsonhospitality.com](mailto:privacy@davidsonhospitality.com) . We reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by any individual who is:

- the consumer who is the subject of the request,
- a consumer on behalf of the consumer's minor child, or
- by a natural person or person registered with the Secretary of State authorized to act on behalf of a consumer.

If the Company requests, you must provide us with sufficient information to verify your identity and/or authority to act on behalf of a Consumer. Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond. PI collected from an individual to determine whether a request is a verifiable consumer request may not be used for any other purpose. We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request. We will attempt to respond to a verifiable consumer request within forty-five (45) days of receipt, but we may require up to ninety (90) days to respond, under which circumstances we will notify you of the need for an extension.

**Other California Privacy Rights (California's "Shine the Light" Law).**

California residents are entitled to contact us to request information about whether we have disclosed personal information to third parties for the third parties' direct marketing purposes. We do not disclose personal information to third parties for the third parties' direct marketing purposes. California users may request further information about our compliance with this law by contacting us in accordance with the "Submitting California Consumer Rights Requests" section of this California Privacy Statement.

**California residents under the age of 18.** If you are a California resident under the age of 18 and a registered user of any Site where this policy is posted, California law permits you to request and obtain removal of certain content or information you have publicly posted. You may submit

your request using the contact information in the “How to Contact Us” section below. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

## **HOW TO CONTACT US**

If you have any specific questions, please see our [Privacy Statement](#) for additional information, including how to contact us.