

# CAMERON VENTURES HOTELS LTD

## PRIVACY POLICY

(reviewed 15 November 2018)

CAMERON Ventures Hotels Ltd (referred to herein as "CAMERON," "we," and "us") is committed to protecting your privacy and wants you to be familiar with how we collect, use, and disclose Personal Data (as defined below). This Privacy Policy (this "Policy") describes our practices in connection with information that we collect through our websites and mobile applications (collectively, the "Site") and by other means as described in this Policy. This Policy also applies to the collection, use, and disclosure of such information by our group (collectively known as "CAMERON Ventures Group. References to "CAMERON," "we" and "us" throughout this Policy, depending upon the context, collectively refer to CAMERON, and other CAMERON Ventures Group Companies.

By using this Site or by providing Personal Data (as defined below) to us, or otherwise indicating your consent to receipt of marketing or other information from us, you consent to all actions taken by us with respect to your Personal Data as set forth in this Policy. If you do not agree to the terms and conditions of this Policy, please do not use the Site or provide any Personal Data to us through our Site or otherwise.

This Policy does not address the collection, use, or disclosure of information by third parties. While this Policy is intended to describe the broadest range of our information processing activities globally, those activities may be more limited in some jurisdictions based on the restrictions of their laws. To the extent any of the activities described herein are not permitted under the laws of your country, state, or province, you agree that the remaining portions of this Policy that are permissible shall apply to the maximum extent permitted by law.

### PERSONAL INFORMATION WE COLLECT

CAMERON may collect "Personal Data" from you, meaning information that identifies you as an individual or from which you may be identified. For example, we may collect:

- contact information, such as your name, mailing address, e-mail address, and telephone number;
- credit card number or other payment account number, billing address, and other payment and billing information ("Payment Information");
- records and copies of your correspondence if you contact us;
- information necessary to fulfil special requests (e.g., health conditions that require specific accommodation);
- guest stay information, including the hotels where you have stayed, date of arrival and departure, and goods and services purchased;
- information collected through the use of closed-circuit television systems, card key and other security systems; and
- in limited cases, information relating to the credit of customers.

We may collect Personal Information from a variety of sources including:

- through the Site;
- through reservation and call centres;
- through social media and brand channels (e.g. Facebook, Twitter);
- From CAMERON subsidiaries, or other third parties; or
- when you otherwise voluntarily provide it to us, including in connection with any loyalty program

We may also combine Personal Data we collect with publicly available Personal Data and Personal Data we receive from others or cross-reference with others. The collection and use of Personal Data, whether separately or combined, is done in accordance with and for the purposes described in this Policy.

Our website may also use a website recording service which may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Data collected by this service is used to improve our website usability. The information collected is stored and is used for aggregated and statistical reporting and is not shared with anybody else.

If you voluntarily share "Sensitive Personal Data" (e.g., Personal Data related to your health, racial or ethnic origins, political opinions, religious or similar beliefs, membership of a trade union or professional association, physical or mental health or condition, genetic data, sexual life or judicial data) with us, that information may be used to provide a better experience and meet your particular needs. For example, if you voluntarily convey a health-related need to us, we may store and use that information in order to provide a room with appropriate amenities. We do not collect or store Sensitive Personal Data unless it is voluntarily provided by you. By providing such Sensitive Personal Data, you expressly consent to our collection, processing, and storage of that information in accordance with the terms of this Privacy Policy.

## HOW WE USE THE PERSONAL INFORMATION WE COLLECT

CAMERON collects Personal Data about guests, visitors to the Site, and others, so that we can provide an experience that is responsive to the needs of such individuals. CAMERON may collect, use, and disclose Personal Data for one or more of the following purposes:

■ **Fulfilment of Reservation or Information Requests:** To fulfil your requests such as completing a credit card transaction or booking a reservation at any CAMERON Hotel, or responding to your requests that we send marketing, informational or other newsletters to you (and to personalize such newsletters and the Site to your preferences). For example, when you make a reservation through CAMERON's central reservation system, we may collect Payment Information from you, and may use and disclose such Payment Information to fulfil your reservation.

■ **Administrative and Other Communications:** To send you important information regarding the Site, changes to our terms, conditions and policies, or other administrative information (e.g. information about your travel reservations, such as reservation confirmations).

■ **Marketing Communications:** We may use your Personal Data to determine whether you are eligible for and/or inform you, if you have provided your consent, of products, programs, enhancements, events, special offers, and services of CAMERON Ventures Hotels that might be of interest to you. We promise only to send you relevant and timely marketing communications and we will give you the opportunity to decline to receive some or all of these communications every time we send them. For more information, see the "Your Choices" section of this Policy below and if you wish you can [Opt-out here](#) from receiving further communications. Please allow us up to one month to process all data regarding your opt out request.

■ **Promotions:** To operate sweepstakes, contests, or other marketing or promotional activities (collectively, "Promotions"). We typically ask you for certain Personal Data when you enter or participate in such Promotion and, if applicable, win a prize, and we use such Personal Data to administer the Promotion. Participation in these Promotions is completely voluntary, and you have a choice whether to disclose your Personal Data. You should carefully review the rules, if any, of each Promotion in which you participate, as it may contain additional important information about our use of your Personal Data. To the extent that the Promotion's rules concerning the treatment of your Personal Data conflict with this Policy, the Promotion's rules shall control.

■ **Services:** Upon completion of a reservation, to provide suggestions and recommendations of goods or services that may be of interest.

🏠 **Surveys:** To conduct or facilitate surveys and to ask for your responses to questionnaires in order to provide better products and services to guests and Site visitors. Completion of any surveys or questionnaires is entirely voluntary.

🏠 **Customer Care:** To track, process, and respond to customer care enquiries and to enhance and improve the customer experience. We may also transmit your Personal Data to third party service providers to allow those third parties to track, process, and respond to customer care inquiries.

🏠 **Internal Business Purposes:** For our internal business purposes, such as data analysis, audits, developing new products, enhancing the Site, improving our services, identifying usage trends and visiting patterns, determining the effectiveness of our Promotions, and meeting contractual obligations

🏠 **Our Rights and Legal Obligations:** To:

- (i) comply with legal and regulatory requirements or demands in accordance with applicable law, a court order, subpoena or other legal process,
- (ii) detect, prevent, or take action against illegal activities, suspected fraud, or situations involving potential threats to the rights, privacy, safety, or property of CAMERON, Licensed Hotels, Affiliates, you, or others; or
- (iii) enforce or apply our [Terms of Use](#) and/or other agreements and policies.

🏠 **E-mails to Friends:** To permit you to forward information about our products, services, and Licensed Hotels to another individual, such as a friend or co-worker. If you wish to use this feature, you may be required to provide to us, and we may use, the applicable individual's name and e-mail address to facilitate your sending of such messages to such individual (and any Personal Data—such as your name and your email address—provided in connection with sending such information, will be disclosed to such individual). By using this functionality, you affirm that you are entitled to use and to provide to us the recipient's name and e-mail address for this purpose. We will not seek to use the applicable individual's Personal Data for any purpose other than to allow the e-mail to be sent, unless we disclose such other purpose to you at the time that you provide such Personal Data to us or unless we have separately collected such Personal Data through other means.

🏠 **Other Uses:** We may also use your Personal Data in other ways as described when you provide such information to us or for other purposes with your consent.

## HOW WE SHARE AND DISCLOSE PERSONAL INFORMATION

🏠 **Best Western “BW” Group Companies:** We may share your Personal Data with BW Group Companies so that they may use such Personal Data for the purposes described in this Policy. BW Group Companies are required to protect your Personal Data consistent with this Policy.

**BW is the entity that is responsible for the management of such jointly used Personal Data.**

🏠 **Licensed Hotels, Affiliates, and Third Parties:** We may also share your Personal Data with Licensed Hotels, Affiliates, BW Group Companies and other third parties located around the world for the purposes described in this Policy (e.g., to send your reservation information to the applicable Licensed Hotel or Affiliate, to provide Licensed Hotels, Affiliates, or other third parties with information on the rewards, points, or credits earned by you in connection with the Best Western Rewards Program, and to allow Licensed Hotels, Affiliates, and third parties to determine whether you are eligible for and/or inform you, if you have provided your consent, of products, programs, services, and promotions that they believe might be of interest to you).

🏠 **Third-Party Service Providers:** CAMERON relies on numerous third-party service providers to provide certain products and services on our behalf, including reservation services, credit card/payment processing and billing, IT services, customer care, e-mail delivery services, communication and delivery of promotional and marketing materials via e-mail and direct mail, administering guest surveys and Promotions, administration, data analysis, and other similar services.

We may share your Personal Data for the purpose of enabling these third parties to provide such services or as otherwise necessary for the ongoing operation of CAMERON's business. Some of these third-party service providers may be located overseas and in particular outside the UK/EEA. When we do outsource the processing of your Personal Data to third parties or provide your Personal Data to third party service providers, we require those third parties to protect your Personal Data with reasonable security measures and to limit their use only to the purposes for which we have disclosed it to them.

🏠 **Promotions:** Personal Data submitted in connection with Promotions may be shared with third-party sponsors of such Promotions (irrespective of whether such Promotions are hosted by us), or otherwise in accordance with the rules applicable to such Promotion.

🏠 **Assignment:** In the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of CAMERON Ventures Hotel's or the CAMERON Ventures Group Companies' business, assets, or stock (including in connection with any bankruptcy or similar proceedings), we may transfer any and all information that we collect pursuant to this Policy. Any successor, assignee or transferee may use your Personal Data as described in this Policy.

🏠 **Social Networking Forums:** CAMERON may make available interactive services (e.g., message boards, forums, and blogs) through which you may post information and materials on the Site. Please note that any information you disclose through such services becomes public information and may be available to visitors to the Site and to the general public. We urge you to exercise discretion and caution when deciding to disclose your Personal Information, or any other information, through these services.

**WE ARE NOT RESPONSIBLE FOR THE USE OF ANY PERSONAL DATA THAT YOU VOLUNTARILY DISCLOSE THROUGH SUCH SERVICES.**

🏠 **Law Enforcement; Emergencies; Compliance:** We may disclose your Personal Data:

- (i) when we have reason to believe that it is necessary to identify, contact, or bring legal action against persons or entities that may be causing injury to you, CAMERON, or others;
- (ii) when we believe that applicable law or regulation (including laws and regulations outside your country of residence) requires it;
- (iii) as mandated by subpoena, court order, or legal process;
- (iv) to establish or exercise our legal rights, defend against legal claims, or protect our operations;
- (v) to protect the rights, privacy, safety, or property of CAMERON, Group Companies, you, or others; and
- (vi) to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Use or other agreements or policies, or as otherwise required or permitted by law.

## CAMERON - CONTROLLER OF YOUR PERSONAL DATA

CAMERON is registered with the Information Commissioners office. For the purposes of the General Data Protection Regulation 2018, we are a data controller.

## NON-PERSONAL INFORMATION

CAMERON may also collect "Non-Personal Information," meaning aggregated and/or anonymized information, demographic information, and any other information that does not reveal your specific identity. Because Non-Personal Information does not personally identify you, we may use and share such information with CAMERON Group Companies, and other third parties for any purpose, including without limitation to facilitate and improve your ongoing access to and use of our Site, to best tailor our services to suit personal interests, to analyse visiting patterns, enhance and improve customer service, and for our other business purposes. As you navigate the Site, we and our service providers

may collect certain Non-Personal Information such as your computer type (Windows or Macintosh), screen resolution, OS version, Internet browser, and Internet browser version using automatic data collection technologies, such as "cookies" and so-called "pixel tags," "web beacons," "clear GIFs," and other similar technologies.

In addition, we may engage third party tracking and advertising providers to act on CAMERON's behalf to track and analyse your usage of our Site through the use of such automatic data collection technologies. These third parties collect and share with us, as we may request, Site usage information about visits to our Site, measure and research the effectiveness of our advertisements, track page usage and paths followed during visits through our Site, help us target and track use of our Internet banner advertisements on our Site and on other sites, and track use of other links from our marketing partners' sites to our Site. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## COOKIES

Cookies are small text files placed on your computer or mobile device by a website's server and are commonly used on the internet. Cookies contain anonymous information, for example a unique identifier and the name of the website, as well as some numbers and digits. We use them to:

- remember your preferences, and items you have placed in your shopping cart;
- collect information that will help us understand visitors' browsing habits on our website;
- compile statistical reports on website activity, e.g. number of visitors and the pages they visit;
- temporarily store any information which you may enter in tools, such as calculators or demonstrations on our website;
- in some cases, remember information about you when you visit our site. We may need to do this to provide some of our services;
- in some cases, information about your booking so you can return to it at a later stage.

We also collect Non-Personal Information when you voluntarily provide this information to us.

Additionally, we may aggregate or anonymize Personal Data in a manner such that the end product does not personally identify you or any other individual (e.g., by using Personal Data to calculate the percentage of our Site users who are from a particular geographic location).

We do not store any personal information in cookies that others could read and understand.

We use three types of cookie:

Session cookies – these are temporary and are deleted as soon as you close your browser.

Persistent cookies – these are stored on your computer until they expire, or you remove them.

Persistent cookies store your personal preferences such as your language preferences on multilingual sites to make subsequent visits easier. They also for example remember questions we have asked you previously, such as a request to complete an online survey. A persistent cookie will prevent you from being asked to complete the same survey every time you visit the website.

Third Party cookies - In addition, we may engage third party tracking and advertising providers to act on CAMERON's behalf to track and analyse your usage of our Site through the use of such automatic data collection technologies. These third parties collect and share with us, as we may request, Site usage information about visits to our Site, measure and research the effectiveness of our advertisements, track page usage and paths followed during visits through our Site, help us target and track use of our Internet banner advertisements on our Site and on other sites, and track use of other links from our marketing partners' sites to our Site. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. Our website may also use a website recording service which may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. Data collected by this service is used to improve our website usability. The information collected is stored and is used for aggregated and statistical reporting and is not

shared with anybody else. For information about how you can opt-out of receiving targeted advertising from many providers, see the “Your Choices” section of our Privacy Policy.

Our website may also use software to improve your experience by identifying areas you have visited before or areas you may be interested in. To do this we may drop persistent and session cookies onto your computer or device. The information collected is safely stored and is also used for aggregated and statistical reporting. We will not collect any Personal Data.

## ACCEPTING OR REJECTING COOKIES

Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. The “Help” function within your browser should tell you how to do this.

If you disable or refuse cookies, please note that some parts of this Site may then be inaccessible or not function properly. Please note: If you wish to make a booking online, the CAMERON booking engine requires you to have cookies enabled in your browser in order to complete the online reservation. This is a necessary part of our secure system for online booking. If you do not wish to have cookies enabled, then you can telephone us to make a reservation.

If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that stores cookies. Alternatively, the websites [www.aboutcookies.org](http://www.aboutcookies.org) and [www.allaboutcookies.org](http://www.allaboutcookies.org) have produced a series of web pages which explain how cookies work and how they can be managed.

## IP ADDRESSES

Your IP address is a number that your Internet Service Provider automatically assigns to the computer that you are using to access the Site. This number is identified and logged automatically in our server log files whenever users visit the Site, along with the time of each visit and the page(s) that were visited. Collecting IP addresses is standard practice on the Internet and is done automatically by many websites. We use IP addresses for purposes such as calculating Site usage levels, helping diagnose server problems, validation of a legitimate user session via Google® captcha and administering the Site. Please note that we treat IP addresses, server log files, and related information as Non-Personal Information, except when we are required to do otherwise under applicable law.

## DO NOT TRACK

Your web browser may let you choose your preference as to whether you want to allow websites to collect information over time about your online activities across different websites or online services. At this time, the Site does not respond to such “Do Not Track” or similar preferences you may have configured in your web browser, and the Site may continue to collect information in the manner described in this Policy. However, as stated in the “Non-Personal Information” section above, we do allow you to exercise some choice in the information collected by adjusting your browser’s cookie settings.

## THIRD-PARTY SITES

The Site may contain links to third-party websites. These linked sites are not under CAMERON's control, and we are not responsible for the privacy practices or the contents of any such linked site (or any link contained in any linked site). We provide such links only as a convenience, and the inclusion of a link on the Site does not imply endorsement of the linked site by CAMERON. If you decide to access any of the third-party websites linked to this Site, you do so entirely at your own risk and subject to the terms and conditions of use and privacy policies for such websites. If you provide any Personal Data through any such third-party website, your transaction will occur on such third-party website



(not this Site) and your Personal Data will be treated in accordance with the privacy policy of that third party.

**PLEASE NOTE THAT THIS POLICY DOES NOT ADDRESS THE PRIVACY OR INFORMATION PRACTICES OF ANY THIRD PARTIES.**

## SECURITY

Because the security of your Personal Data is important to us, we have implemented security measures that provide reasonable precautions against the unauthorised access, disclosure, alteration, or destruction of Personal Data. The Personal Data we collect from you online is stored by us and/or our service providers and protected through a combination of physical and electronic access controls, firewall technology, and other reasonable security measures. Nevertheless, such security measures cannot prevent all loss, access, misuse, or alteration of Personal Data, and, to the fullest extent permitted by law, we are not responsible for any damages or liabilities relating to any such incidents. Where required by law, we will notify you of any such loss, access, misuse, or alteration of Personal Data that may affect you, so that you can take the appropriate actions to protect your rights.

Please do not send us your payment information or Sensitive Personal Data through e-mail or any undesignated area (e.g., submission of your credit card number in a "comment" field). If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the alleged problem by contacting our Customer Care Department as set forth below in this Policy.

Please note that, if you choose to notify us via physical mail, this will delay the time it takes for us to respond to the alleged problem.

## YOUR CHOICES

You may always choose what Personal Data (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected (for example, we cannot take a reservation without a name), and we may be unable to provide you with all or certain reservation or other services.

Data privacy under the General Data Protection Regulation 2018 may require us to obtain your consent before we send you information that you have not specifically requested. In certain circumstances, your consent may be implied (e.g., where communications are required in order to fulfil your requests and/or where you have volunteered information for use by us). In other cases, we may be required to seek your consent expressly (e.g., where the information collected is regarded as Sensitive Information under local regulations).

If you do not wish for us to use your contact information to promote our own or third parties' products or services, you should contact us as set forth in the "Contacting Us" section of this Policy below. If you have received a promotional e-mail from us and no longer wish to receive such e-mails in the future, you may opt-out by using the unsubscribe function in the e-mail you have received from us. Please note that when you unsubscribe from receiving promotional emails from us, your contact details will be "suppressed" rather than deleted. This will ensure that your request is recorded and retained unless you provide a later consent that overrides it.

Please note that if you opt-out as described above, we will not be able to remove your Personal Data from the databases of other third parties with which we have already shared your Personal Data.

We are entitled to assume you do not object to our doing any of the things mentioned in this statement unless you tell us otherwise in writing or in any other approved manner. However please allow up to one month for us to process all data regarding your privacy choices. Opting out does not apply to service messages such as booking confirmation emails and statements.

If you do not opt-out, in all future marketing communications we will give you the opportunity to decline to receive further mailings. Except where expressly permitted by the General Data Protection Regulation 2018, we will only deal with the personal details you give us as set out above unless you agree otherwise. We have appropriate security measures in place to protect this information.

## SUBJECT ACCESS RIGHTS

CAMERON may allow you to review certain Personal Data through the Site or through other online means. Information about the ability to review your Personal Data is generally available at the Site or on the printed materials where such type of Personal Data was first submitted.

Pursuant to applicable law, you may have the right to request access, deletion or changes to the Personal Information we maintain about you and, where appropriate, request that we update such Personal Information you believe is incomplete, inaccurate or out of date. You can also enquire whether we maintain Personal Information that relates to you. Although CAMERON will attempt in good faith to respond to your request, we may not be able to provide, delete, or change your Personal Information in all circumstances. For example, CAMERON may not be able to change, provide, or delete Personal Information about you if it would impose an undue burden or expense, or require CAMERON also to change information relating to another person. In addition, in some circumstances pursuant to applicable law, you may have the right to request that we cease using Personal Information about you on the grounds that such Personal Information was acquired by unjust means or used in violation of law. CAMERON will honour such requests as required and within the time specified by applicable law and, where permitted by law, may charge an appropriate fee to cover the costs of responding to your request.

You are generally entitled to ask us what details of yours are being held or processed, for what purpose and to whom they may be or have been disclosed. We promise to respond to your request within 30 days of receipt. In certain limited circumstances we are entitled to refuse your request. If you believe that any of your personal details which we are processing are inaccurate or incorrect, please contact us immediately.

When making a subject access request, please be sure to include your full name, address and telephone number, and details of your recent stay at a CAMERON Hotel so we can ascertain your identity and whether we have any Personal Data relating to you, or in case we need to contact you to obtain any additional information we may require to make that determination. You can submit your request using our Subject Access Request form [here](#) if you so wish. We are not responsible for updating, removing or suppressing information from the databases of third parties with whom we have already shared your Personal Data, or for limiting their use of your Personal Data.

Should you require any additional support regarding these rights, you can contact our Data Protection Officer using the details in the 'Contacting Us' section of this Policy.

## RETENTION PERIOD

CAMERON only collects Personal Data that it believes is necessary to perform the services that you seek from CAMERON and to exercise its rights and comply with its obligations as otherwise outlined in this Policy. We will keep your Personal Data only as long as we need it for the purposes for which we collect it or as otherwise permitted by law.

## NOTE REGARDING THE USE OF THE SITE BY MINORS

The Site is not directed to minors (as defined by applicable law), and we request that such individuals do not provide Personal Data through the Site. If we learn we have collected or received Personal Information from a minor under the age of 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a minor under the age of 13, please contact our Customer Care Department as set out in the "Contacting Us" section of this Policy.



## JURISDICTION STATEMENT

The Site is operated from the United Kingdom in accordance with laws of England & Wales, and visitors to our Site should be aware that the laws of England & Wales may differ from those of your country of residence. CAMERON does not represent or warrant that the Site or any part thereof is appropriate or available for use in any particular jurisdiction. Those who choose to access the Site do so on their own initiative and at their own risk and are responsible for complying with all local laws, rules, and regulations. We may limit the Site's availability, in whole or in part, to any person, geographic area or jurisdiction we choose, at any time and at our sole discretion.

## CONTACTING US

If you would like to update your information or modify your communication preferences, please contact us by e-mail at [customercare@cameronventuresgroup.co.uk](mailto:customercare@cameronventuresgroup.co.uk) by phone at 01638 581182 or write to us at the following address:

**CAMERON Ventures Hotels, Cricket View, Mildenhall, Suffolk, IP28 7ES.**

Should you have any questions about this privacy statement or your personal data, please contact our Data Protection Officer at [customercare@cameronventuresgroup.co.uk](mailto:customercare@cameronventuresgroup.co.uk) or by phoning 01638 581182. Please note that e-mail communications will not necessarily be secure; accordingly, you should not include payment information or Sensitive Personal Data in your e-mail correspondence to us.

## CHANGES TO THE POLICY

CAMERON reserves the right to change, modify, or amend this Policy at any time. The date this Policy was last revised is shown within the policy heading on page 1. If we make a material change to this Policy, we will indicate on the Site that our privacy practices have changed and will provide a link to the new policy.

If we make material changes to how we use your Personal Information, we will notify you by e-mail to the e-mail address specified in your account (if applicable) and/or through a notice on the Site's home page, and we will provide you with an opportunity to opt-out of such new or different use.

Any changes to the Policy will become effective upon our posting of the revised Policy on the Site.

Use of the Site following such changes constitutes your acceptance of the revised Policy then in effect.

## ADDITIONAL INFORMATION

### DATA TRANSFER TO BEST WESTERN

**DATA SHARED WITH BEST WESTERN UNDER THE TERMS OF CAMERON'S CONTRACT WITH BEST WESTERN IS NO LONGER CONTROLLED BY CAMERON AND ANY QUERIES RELATED TO SUCH DATA IS SUBJECT TO THE FOLLOWING ADDITIONAL PROVISIONS.**

Data submitted by CAMERON to BW and processed by BW is subject to transfer and storage within the United States of America. BW complies with the U.S.-EU Privacy Shield and the U.S.-Swiss Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Information from European Union member countries and Switzerland. BW has submitted its self-certification that it adheres to the Privacy Shield principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Privacy Shield program, and to view BW's certification once it is approved by the U.S. Department of Commerce, please visit <http://www.privacyshield.gov>. Please note that a violation of BW's commitment to Privacy Shield may be investigated by the Federal Trade Commission and/or the United States Department of Commerce.

If you feel that BW has mishandled your Personal Information in violation of the Privacy Shield Privacy Principles, please contact BW by emailing [Custserv@cs.bestwestern.com](mailto:Custserv@cs.bestwestern.com) with a description of your complaint. After receiving such description, a representative from Best Western's Customer Care Department will contact you to set up a time and manner to discuss your complaint.

CAMERON and BW are dedicated to addressing all legitimate complaints about adherence to this Policy and the Privacy Shield Privacy Principles respectively and will make a good faith effort to engage in communications to address such complaints.

By submitting any Personal Data to CAMERON, you consent to the transfer of such Personal Data to BW and to the processing of such Personal Data in countries other than your country of residence, including countries outside the UK/EEA that may provide a different level of data security than in your country of residence. In addition, if we need to transfer any Personal Data to Licensed Hotels, Affiliates, or other third parties pursuant to this Policy, please be advised that such entities may or may not be located in countries that are considered "adequate" pursuant to the General Data Protection Regulation 2018 or other laws.

#### **CALIFORNIA USERS: YOUR CALIFORNIA PRIVACY RIGHTS**

California's "Shine the Light" law, Civil Code section 1798.83, requires certain businesses to respond to requests from California customers asking about the businesses' practices related to disclosing personal information to third parties for the third parties' direct marketing purposes. Alternatively, such businesses may have in place a policy not to disclose Personal Information of customers to third parties for the third parties' direct marketing purposes if the customer has exercised an option to opt-out of such information sharing. BW has such a policy in place. You may opt-out of information sharing or find out about any rights you may have under California Civil Code section 1798.83 by emailing BW at [Custserv@cs.bestwestern.com](mailto:Custserv@cs.bestwestern.com).

Please note that in order to fulfil certain rewards, BE must share your information with BW Subsidiaries, Affiliates or third-party service providers. In addition, when you make a reservation or stay at a Licensed Hotel or through an Affiliate, you are providing your information directly to that Licensed Hotel or Affiliate and the restrictions contained in this Section will not apply to BW with respect to such information. Please follow the instructions provided to you by any third-party service providers to unsubscribe from their messages. If you have opted-out as described above, and thereafter you elect to initiate a transaction that requires us to share your information with such third party again, then your previous opt-out preferences will not apply.

Best Western's Privacy Policy may be viewed at [www.bestwestern.co.uk/policies/privacy-policy](http://www.bestwestern.co.uk/policies/privacy-policy)