



## **HILTON GLOBAL PRIVACY POLICY**

### **Last Updated July 2007**

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At Hilton, we strive to deliver outstanding products, services, and experiences around the world. We value your business and, more importantly, your loyalty. We recognise that privacy is an important issue. We have developed this Global Privacy Policy (this "Policy") to explain our practices regarding the personal information we collect when you visit this site. Some jurisdictions also require notice concerning other means of collecting personal information; for those jurisdictions, this Policy also explains our practices regarding personal information obtained from sources other than our websites, such as written or verbal communications or information collected when you visit one of our properties.

Please read this Policy carefully before submitting personal information about you to us. Also, please note that this Policy does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as airlines, car rental companies and other service providers, companies that organise or offer packaged travel arrangements, marketing partners, or customers.

#### **Personal Information We Collect**

At every touch point or guest interaction, we may collect personal information. In addition to any other information you may choose to provide to us, this personal information may include: your name and contact information; date of birth; preferred communication methods; business name, title and business address; credit card details, including the three-digit code that appears on the back of your credit card; member number, frequent flyer or travel partner programme affiliation; date of arrival and departure; room and holiday preferences; travel history; and details on hotel, airline and hire car packages you book. We may also record details on joint travellers, including their names and frequent flyer numbers, and the age of the driver of the hire car.

In addition we collect other personal information when you interact with Hilton in various ways such as:

- When you register for a Fast Reservations Account, we also ask you to select a username and password.
- If you choose to create an online profile for meeting and event planning (e.g., weddings), we record meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events,



information on your organisation (name, annual budget, number of sponsored events per year).

- When you enroll in our HHonors programme online, we will also ask you to indicate whether you are over 18 years old, and record a HHonors number and password. Also, when you book a Rewards Reservation or purchase HHonors Points online, we may ask for additional specific account information such as corporate account number, group or convention code, travel agent number or AAA number.
- From time to time, this site may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend. If you choose to do so, we will ask you for the recipient's name and email address, along with the text of any message you choose to include. By using this feature, you warrant that you are entitled to use and provide us with the recipient's name and email address for this purpose.

### **Use of Personal Information Collected About You**

We use your personal information to provide the services you request from Hilton such as to facilitate: reservations; the purchase of a holiday package or timeshare; purchases from the Hilton To Home™; the booking of airfares and hire cars; membership in the HHonors programme; and other transactions. We also use the personal information to provide you with information about meeting and event planning and access to specific account information for administrative purposes. In addition, we may use the information to: improve Hilton's services; provide you with the expected level of hospitality; and ensure the site is of interest to you. We also use details to send you newsletters, promotions and featured specials, and to conduct online surveys, sweepstakes, prize draws, and other contests via email, telephone or post. If you apply for employment with Hilton, we use the personal information you supply to process your job application.

### **How We Share Personal Information**

As a global company, we endeavour to provide you with the same level of service that you have come to expect at Hilton whether you are in San Francisco, London or Tokyo. To provide this service, we may share your personal information with other members of the Hilton Family of companies, franchisees, managed hotels or service providers that may be located in countries outside of your own. Although the data protection laws of these various countries may not be as comprehensive as those in your own country, Hilton will take appropriate steps to ensure that your personal information is handled as described in this Policy.

- Hilton Family of companies: We may share personal information within the Hilton Family of companies, that may jointly use the personal information for the



purposes described above. Hilton Hotels Corporation is the party responsible for the management of the jointly used personal information.

- Franchised Hotels, Managed Hotels, Timeshare and Fractional Resorts: We may share personal information with franchised hotels, hotels that we manage but do not own, timeshare or fractional resorts in order to provide you with services.
- Electronic Billing Programme: If you participate in the “eFolio programme”, billing information will be shared with the credit card provider and if you use a corporate credit card, possibly, your employer.
- Group Events or Meetings: If you visit Hilton as part of a group event or meeting, information collected for meeting and event planning may be shared with the organisers of those meetings and events, and, where appropriate, guests who organise or participate in the meeting or event.
- Business Partners: From time to time we may partner with other companies to provide co-sponsored or co-branded promotions, products and services and may share your information with our co-sponsor. For example, we may co-sponsor some sweepstakes, prize draws, competitions or contests on our site with other companies or we may provide prizes for sweepstakes and contests sponsored by other companies. If you enter one of these sweepstakes or contests, we may share your information with our co-sponsor or the third party sponsor.
- Onsite Services: We may share personal information with providers of onsite services that provide services such as spa treatments, golf or dining experiences at a restaurant.
- Service Providers: We rely on service providers to provide certain products and services, such as credit card billing, reservations services, and administering the HHonors, Hilton Grand Vacations Club and The Hilton Club programmes, providing services in connection with our websites, including airline and hire car packages, communicating news and delivering promotional and transactional materials via email and direct mail, processing credit card transactions, data hygiene and enhancement services and administering sweepstakes, prize draws, competitions and customer surveys for which it is necessary to provide personal information. Hilton will disclose personal information to service providers as appropriate.
- Business Transactions: As we develop our business, we might sell, buy, restructure or reorganise businesses or assets. In the event of a merger, consolidation, sale, liquidation or transfer of assets, Hilton may, in its sole and absolute discretion, transfer, sell or assign information collected, including



without limitation, non-personal information and personal information, to one or more affiliated or unaffiliated third parties.

- Other: In addition Hilton may disclose personal information, with or without prior notice to you, in order to: (i) comply with applicable laws; (ii) respond to governmental inquiries or requests from public authorities; (iii) comply with valid legal process; (iv) protect the rights, privacy, safety or property of Hilton, site visitors, guests, employees or the public; (v) permit us to pursue available remedies or limit the damages that we may sustain; (vi) enforce our Site Usage Agreement; and (vii) respond to an emergency.

### **Sensitive Information**

The term “sensitive information” refers to information related to your racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background or trade union membership. We do not generally collect sensitive information unless it is volunteered by you. We may use health data provided by you exclusively to serve you better and meet your particular needs.

### **Personal Information From Children**

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission.

### **Non-Personal Information**

When you visit and interact with this site, Hilton and third parties with whom Hilton has contracted to provide services to Hilton, may collect non-personal information (for example, a catalogue of the site pages you visit).

As with many other sites, our site may use “cookies” or other technologies to help us deliver content specific to your interests, to process your reservations or requests, and/or to analyse your visiting patterns. Cookies, by themselves, cannot be used to disclose your individual identity. This information identifies your browser, but not you, to our servers when you visit our site. If you want to remove cookies at any time from your computer, you can delete them using your browser (consult your browser’s “help” menu to learn how to delete cookies).

We also may collect data by using “pixel tags,” “web beacons,” “clear GIFs” or similar means (collectively, “pixel tags”) that allow us to know when you visit our site. Through pixel tags, we obtain non-personal information or aggregate information (i.e., the domain name, the areas of the site you visit, your operating system, your browser version, and the URL you came from) which can be used to enhance your online experience and understand traffic patterns.



In addition, we may use third party advertisers to serve advertisements on the Sites. Please note that these third party advertisers also may use cookies, pixel tags and other technologies, among other things, to enable such third party advertisers to record which ads your browser has seen and which site pages you may have been viewing when the ads were delivered. Hilton does not control the use of this technology or the resulting information and is not responsible for any actions or policies of such third parties.

Because non-personal information does not personally identify you, we may use or disclose such information for any purpose. In some instances, we may combine non-personal information with personal information (such as embedding e-mail addresses in cookies). If we do combine any non-personal information with personal information, the combined information will be treated by us as personal information in accordance with this Policy.

### **Links to Third-Party Websites**

Our site may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on third party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

### **Protecting Personal Information**

Hilton will take appropriate measures to: (i) protect personal information collected against unauthorised access, disclosure, alteration or destruction, and (ii) keep personal information accurate and up-to-date, consistent with applicable law. We also seek to require our affiliates and service providers to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use technology to protect the personal information that you transmit to us via our site. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

For your own privacy protection, we encourage you not to include sensitive personal information in any emails you may send to us. Please do not send credit card numbers or any sensitive personal information to us via email.

### **Changing Personal Information**

If you have registered for a Fast Reservations Account, the information you provided to us at the time of registration may be accessed, reviewed and updated at any time by signing in using your Username (or HHonors number) and Password (or PIN), and clicking on "my profile".



To the extent required by applicable law, you may be able to request that we inform you about the personal information we maintain about you and, where appropriate, request that we update, correct, and/or suppress personal information about you that we maintain in our active database. We will make all required updates and changes within the time specified by the applicable law and, where permitted by law, may charge an appropriate fee to cover the costs of responding to the request. Such requests must be submitted in writing to the following address: Hilton Customer Privacy Department, 5001 Spring Valley Road, Suite 400-W, Dallas, Texas 75244, USA. To protect your confidentiality, we can only respond to such requests to the email address that you have registered or otherwise provided to us. Please remember that if you make such a request, we may not be able to provide you with the same quality and variety of services to which you are accustomed.

In addition, in some circumstances based on applicable law, you may request that we cease sharing personal information about you with our business partners or that Hilton cease the use of personal information about you on the grounds that such personal information was acquired by unjust means or used in violation of law by sending your written request to Hilton Customer Privacy Department, 5001 Spring Valley Road, Suite 400-W, Dallas, Texas 75244, USA. We will seek to honour those requests consistently with applicable law.

### **Retaining Personal Information**

We retain personal information about you for the period necessary to fulfil the purposes outlined in this Policy unless a longer retention period is required or permitted by applicable law.

### **Choices - Marketing Lists**

If you have given us your contact information (postal address, fax number, email address or phone number), we may want to inform you about our services or invite you to events by email, telephone or post.

If you prefer not to receive marketing materials from us, you may change your preferences at any time by: (i) sending us an email to [e\\_opt\\_out@hilton.com](mailto:e_opt_out@hilton.com); (ii) writing to us (and include your email address) at Hilton Customer Privacy Department, 5001 Spring Valley Road, Suite 400-W, Dallas, Texas 75244, USA; or (iii) using the unsubscribe function in the email you receive from us. We will update your preferences as soon as reasonably practical.

Please note, however, that if you “opt out” as described above, we will not be able to remove your personal information from the databases of affiliates, franchisees or business partners with which we have already shared your personal information (i.e., to which we have already provided your personal information as of the date of your opt-out request).



## **Other Information**

- If you submit an online “pre-application” for timeshare or if you submit a reservation request online, we may be required to ask you to provide your annual income range. If you create an online account for members of Hilton Grand Vacations Club and/or The Hilton Club, we may also ask you to provide your member number, the last four digits of your phone number, and a self-selected password.
- If you are interested in obtaining more information about franchisee opportunities, we may also collect information about your specific interests, such as brand, type of ownership and information about your property type such as current ownership, size of parcel, location of parcel, number of rooms, height limitation and time frame for planning or acquisition.
- If you choose to apply online for employment with Hilton, you will also have the opportunity to send your CV in electronic form, information on education and employment history, desired salary scale, working permits, and any other information you feel is relevant to your application. If you apply for employment online, any information about you which is obtained by us during the application process may be retained by us for purposes of considering your application for employment, as well as for more general management and research purposes. Please see our Online Recruiting Policy for further detail.

## **Policy Modifications**

We may modify this Policy from time to time. When we make material changes to this policy we will post the revised policy on the homepage of our site. You can tell when this Policy was last updated by looking at the date at the top of the Policy. Any changes to our Policy will become effective upon 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.

## **Questions**

If you have any questions about this Policy or how Hilton processes your personal information, please contact us by email to [customer\\_privacy@hilton.com](mailto:customer_privacy@hilton.com) or by post to Hilton Customer Privacy Department, 5001 Spring Valley Road, Suite 400-W, Dallas, Texas 75244, USA.