

# Global and Internet Privacy Statement

## Introduction

This privacy statement (“Statement”) applies to Marriott Vacations Worldwide Corporation (MVWC) and its affiliated operating companies (“Affiliates”). MVWC and its Affiliates (collectively referred to in this Statement as “We” or “we”) have prepared this Statement to inform you of the privacy principles that govern our use of information we obtain from our customers, owners and guests, including information we obtain through our websites (collectively, the “Websites”).

We have a strong commitment to providing excellent service to all of our customers, owners and guests, which includes respecting their concerns about privacy. We understand that those reviewing this Statement may have questions about whether and how we and our Websites collect and use information. We have prepared this Statement to inform you of the privacy principles that govern our collection of use of information, along with a table that outlines our use of Cookies and related technologies. Click [here](#) to view our Cookies & Related Technologies Table (the “Table”). The Table, which appears on a separate page, contains information about multiple websites’ cookies and related technologies.

This Statement and the Table contain information about the steps we take to respect your privacy, the types of cookies and similar technologies we use, the information we collect, how we use that information and for how long collected information is retained. We have organized the Statement by major topic areas, including region-specific details, so that you can quickly access and review the information of most interest to you. Please note that a separate privacy statement and separate terms and conditions apply to the Marriott Rewards® program.

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

Marriott Vacations Worldwide Corporation  
Attn: Privacy Officer  
6649 Westwood Blvd, Suite 500  
Orlando, FL 32821  
United States of America

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

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

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

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

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

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

You may be requested to provide personally identifiable information about others to us (for example, the name, address and contact details of your travel companion). In such cases, we rely on you to obtain that other persons' consent for disclosing their information to us and inform that other person about us, how we will use the information and our contact details for any queries.

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

The use and transfer of your personally identifiable information may result in your information being transferred outside of the location in which it is collected to other jurisdictions. We will protect your personally identifiable information in accordance with applicable data protection laws and will take steps to ensure any transferees do the same.

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

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

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### **Creating an Account Profile**

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

addressed in the security section below. You can access and review, update or deactivate the information in your account profile online.

We treat the information you provide to us as confidential; it is, accordingly, subject to our company's security procedures and corporate policies regarding protection and use of confidential information. Because laws applicable to personal information vary by country, additional measures that satisfy applicable legal requirements may be put in place. Please note that we will never send you an email requesting your user name, password, credit card, social security or national insurance numbers. If you receive an email that looks like it's from one of our companies, but asks you for your credit card number, social security or national insurance number, it is a fraudulent email or "phish."

If you believe "phishers" have obtained access to your personal or financial information, we recommend that you do the following:

- Change your password.
- Contact credit reporting services and have a fraud alert attached to your credit report file. Please be aware that the perpetrator may attempt to use your information to establish accounts or obtain credit at other businesses in their name or yours.

We will not be able to secure your information if you reveal your password to anyone and we will not be liable for any resulting breach of any law in connection with personal data protection.

[Learn more about fraudulent email](#) or "phish" and how to protect your personal information.

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### **Securing the Transmission and Storage of Information**

We treat the information you provide to us as confidential; it is, accordingly, subject to our company's security procedures and corporate policies regarding protection and use of confidential information. When we ask you for credit card information, it is transferred over a Secured Sockets Layer (SSL) line, provided you are using a SSL enabled browser such as Microsoft Internet Explorer, Google Chrome, Mozilla Firefox or Apple Safari. We also use SSL on other select pages where you would enter personally identifiable information. This ensures that your information is encrypted as it travels over the Internet. This secure mode is enabled before any such information is transmitted from your computer. You will know you are in secure mode when the padlock or key icon in the lower right-hand or left-hand corner of the computer screen appears in the locked position. In addition, when accessing a secure server, the first characters of the site address will change from "http" to "https."

After information reaches one of our companies, it is stored on a secure server that resides behind firewalls designed to block unauthorized access. Because laws applicable to personal information vary by country, additional measures that satisfy applicable legal requirements may be put in place.

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### **Confidentiality of Identification Numbers**

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

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

We do not sell or transfer personal information to other companies for their own use without your approval and without giving you the opportunity to opt-out. MVWC and its Affiliates may share your personally identifiable information among themselves. We may maintain personally identifiable information in databases controlled by MVWC and/or any service providers and third parties (including auditors) engaged by MVWC and/or its Affiliates in the United States or other jurisdictions and may process, use, transfer and disclose such information to non-affiliated companies when we have your consent to share the information, need to share your information to provide the product or service you have requested or need to send the information to companies who work on our behalf (e.g., mailhouses and technology service providers) to provide a product or service to you, for general recordkeeping, informational and/or analysis reports and to supplement your information. These companies do not have any right to use the information we provide to them for any purpose beyond what is necessary to assist us.

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

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

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

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### **Children's Privacy**

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

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### **Cookies & Related Technologies**

This website utilizes cookies and may use pixel tags, web beacons or similar technologies for web analytics. "Cookies" are small text files that a website stores on a user's computer. This website requires the use of cookies to store and utilize information you enter across multiple pages. This is a "session" cookie, which expires when you close your browser. We use "persistent" cookies to measure usage of various pages on our website, to help us make our information more pertinent and easy for you to access, and as part of the functionality that allows you to interact with a representative while you are on some of our websites. Persistent cookies will remain on your computer until they expire or are deleted by you. Further, cookies are either First Party Cookies (utilized by us) or Third Party Cookies (utilized by others), for the purposes described above. We do not use "super cookies", sometimes referred to as zombie, perma, or ever cookies, known for their ability to evade removal tactics. Cookies are never utilized on our sites to ascertain personal information about you beyond what you voluntarily provide to us in your dealings with us. Click [here](#) to learn more and to view our Cookies & Related Technologies Table.

You may set your browser to block, refuse, reject, or delete cookies (consult the instructions for your particular browser on how to do this), although doing so may adversely affect your ability to perform certain transactions, use particular functionality and access certain content on our website. We only use cookies or related technologies as your browser permits. Click [here](#) for more information.

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### **Click to Chat**

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

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### **Sweepstakes**

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

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### **Careers**

We use select private label databases and tools hosted by third parties on our websites to collect information from individuals that wish to be considered for potential employment. Information you provide to us via these private label services is accessible and confidential to us. We will not use the information you provide for any purpose other than to allow you to conduct automated job searches or determine your qualifications for potential employment with us. The third-party service providers are prohibited from using the information you provide for any purpose other than collecting it on our behalf.

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### **Other Sites**

This website may contain links to third party sites that might be of interest to you (e.g., airlines, car rental companies). We are only responsible for the privacy statement and content of this website. We are not responsible for the privacy practices or the use of cookies on other companies' websites that you have accessed prior to or after visiting our websites.

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### **Website Survey**

We value your input. If you choose, we welcome your participation in an online survey regarding the usefulness of this website. The information you provide will be used only by us for research and analysis, and possibly to contact you to address customer service matters.

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

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

#### **Australia**

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

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

correct information we hold about you. If this occurs, we will advise you of this and our reason for not agreeing to the correction request.

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

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

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

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

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

When you request a page from our website, our servers log the IP address, the time of the request, the URL of your request and related information. By continuing to use our website, you agree to our placing cookies on your computer in order to analyze the way you use our website, provide you with enhancements and customized content and improve your browsing experience while on our website. Please view our [Cookies and Related Technologies Table](#) for more details about the information we collect when you use any of our websites.

If you do not wish to accept cookies in connection with your use of this website, you must disable the acceptance of cookies within your browser or stop using our website. Note, if you disable the use and acceptance cookies within your browser, many features and benefits within this website, and other websites across the Internet, will no longer be available to you. Visit our [Cookies and Related Technologies Table](#) for information and links on how to adjust and manage your browser cookies.

In accordance with the Data Protection Act of 1998 (DPA), we have established and use standard contractual clauses and only engage with compliant third parties to ensure safe and secure transfer of personal data from the European Economic Area (EEA) to the United States.

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

Some parts of our website use third party services, which may also use cookies as part of the services they provide. You can find out more [here](#).

## **Hong Kong**

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

This website does not collect personally identifiable information from your computer when you browse and request pages from our servers. This means that, unless you voluntarily and knowingly provide us with personally identifiable information, we will not know your name, your email address, or any other personally identifiable information. When you request a page from our website, our servers log the information provided in the HTTP request header including the Internet Protocol (IP) address, the time of the request, the URL of your request and other information that is provided in the HTTP header. We collect the HTTP request header information in order to make our website function correctly and provide

the functionality that you see on this website. We also use this information to understand how visitors use our website and to permit us to adjust its contents and functionality to meet their needs.

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

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

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

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

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

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

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

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

## **Malaysia**

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

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

## **Singapore**

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

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

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

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

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

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

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

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

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

You consent and allow MVWC and its Affiliates and successors to collect and maintain data, including your personal details (provided by you voluntarily on our website, in connection with a marketing event or purchase transaction, as a member of the Marriott Rewards Program or otherwise), such as name, address, telephone and facsimile numbers, email address(es), occupation, government issued ID number, nationality and passport number, in databases controlled by us and/or any service providers and third parties (including auditors) engaged by MVWC, its Affiliates or any successors, in Singapore, Hong Kong, the United States or elsewhere, and consent to the processing, use, transfer and disclosure of such data by us to and/or by its Affiliates world-wide and to their agents and partner companies, to: verify your identification; complete any purchase transaction; administer your Club Membership; send commercial messages (to your address, email, telephone number or otherwise); advise you of other offers and information; carry out general record keeping and maintain a list of current and former Club Members; create informational or analysis reports; supplement your disclosed information; carry out verifications, mailhouse, planning or other legitimate business needs in connection with the improvement of the Club membership experience, the provision of related services and the management thereof; allow for revenue collection or debt recovery; respond to queries by you or others who have been identified by you as your

authorized representative or proxy; and such other purposes as permitted by applicable law. MVWC, its Affiliates and its successors shall permit third parties to have, process, use and disclose your data only for purposes as necessary to assist MVWC, its Affiliates and its successors to achieve the foregoing. We will protect your details in accordance with applicable data protection laws. The use and transfer of this information may result in personal data being transferred outside of the location in which it is collected to the United States, Singapore and other jurisdictions. We will protect your details in accordance with applicable data protection laws and shall take steps to ensure any transferees do the same.

## United States

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

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

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

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

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

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

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## Privacy Statement Changes

In the future, we may need to change our privacy statement. All changes will be made here so that you will always know what information we gather, how we might use that information and whether we will disclose it to anyone. This statement was last updated on February 14, 2017.

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