

BEST WESTERN GB PRIVACY POLICY

Last Updated: May 2018

Best Western International, Inc. (referred to herein as "**BWI**," "**we**," and "**us**") and Interchange and Consort Hotels t/a Best Western Hotels Great Britain (referred to herein as "**BWGB**," "**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 "**Best Western**" and "**BW Group Companies**"). References to "**BWI**," "**BWGB**," "**BW Group Companies**," "**we**" and "**us**" throughout this Policy, depending upon the context, collectively refer to BWI, BWGB Best Western and BW Group Companies.

By using this Site or by providing Personal Data (as defined below) to Best Western, 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 Best Western through our Site or otherwise.

This Policy does not address the collection, use, or disclosure of information by third parties, including entities authorised by Best Western or by an authorised licensee of Best Western to operate Best Western® branded hotels and properties ("**Licensed Hotels**"), and third-party affiliated organisations permitted to sublicense Licensed Hotels outside the United Kingdom in various countries and territories throughout the world ("**Affiliates**"). Please be aware that Licensed Hotels and Affiliates are independent entities neither owned nor controlled by Best Western and BW Group Companies. Licensed Hotels and Affiliates might have their own privacy policies, which might be different from this Policy. To learn about the privacy practices of any of the Licensed Hotels or Affiliates, please review their respective privacy policies, not this Policy.

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

Best Western 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**");
- Best Western Rewards® ("**BWR**") loyalty program member information, online user account details, profile or password details and any frequent flyer or travel partner program affiliation;
- records and copies of your correspondence if you contact us;

- information necessary to fulfill 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 Best Western subsidiaries, Licensed Hotels, Affiliates, or other third parties; or
- when you otherwise voluntarily provide it to us, including in connection with our loyalty program (i.e. BWR).

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. Entry into website forms can be removed by visiting <https://sessioncam.com/choose-for-form-data-not-to-be-recorded/> and selecting 'Enable Masking of All Data', whilst tracking on the website entirely can be removed by visiting <https://sessioncam.com/choose-not-to-be-recorded/> and selecting 'Disable Tracking Completely'.

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 for a Licensed Hotel 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.

BEST WESTERN REWARDS (“BWR”) PROGRAMME

The Best Western Rewards programme is administered by Best Western International, Inc. (BWI), and as such your account information will be transferred to BWI in the United States of America, where it will be used, stored and processed in compliance with the U.S.-EU Privacy Shield and the U.S.-Swiss Privacy Shield Framework.

In order to enroll in the BWR program, you must provide us with some of your Personal Information, such as your name, e-mail address, mailing address, and phone number, which is required in order

to create and manage your account, administer the BWR program, and provide the benefits of the BWR program to you.

Enrolling in or maintaining a membership in the BWR program constitutes your acceptance of the BWR terms and conditions (available at www.bestwesternrewards.com) and your express written consent to all actions taken by us with respect to your Personal Information in compliance with this Policy. Your continued use of the Site after expiration of the BWR program constitutes your implied consent to all actions taken by us with respect to your Personal Information in compliance with this Policy.

By becoming a member of the BWR programme, you consent to the transfer of such Personal Data to and the processing of such Personal Data in the United States of America.

HOW WE USE THE PERSONAL INFORMATION WE COLLECT

Best Western 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. Best Western may collect, use, and disclose Personal Data for one or more of the following purposes:

- **Fulfillment of Reservation or Information Requests:** To fulfill your requests such as completing a credit card transaction or booking a reservation at any Licensed Hotel worldwide through our central reservation system (who could be located outside the UK/EEA), 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 Best Western's central reservation system, we may collect Payment Information from you, and may use and disclose such Payment Information to fulfill your reservation. BWI and BWGB maintain worldwide accessible websites, call centres, and database computers in the United States of America, United Kingdom and other locations around the world, which are intended to help Best Western conduct business and to facilitate the operation and maintenance of its central reservation system.
- **Membership Programs:** To administer and operate voluntary membership programs, including loyalty programs such as BWR, which allows members to earn and redeem rewards, points, or credits in connection with the programs. For complete BWR program terms and conditions, visit www.bestwesternrewards.com.
- **Best Western Travel Card[®]:** To process and ship a Best Western Travel Card, which is a stored value card redeemable for lodging charges (room rate and applicable taxes) for stays at Licensed Hotels worldwide. We may also use your Personal Information as necessary to permit your use and redemption of a Best Western Travel Card. For complete Best Western Travel Card terms and conditions, see www.travelcard.bestwestern.com.
- **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 Best Western and third parties (including Licensed Hotels and Affiliates) that might be of interest to you. We promise to only 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](#) to receiving further communications. Please allow us up to one month to process all data regarding your opt out.
- **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 Best Western's 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 strictly voluntary.
- **Customer Care:** To track, process, and respond to customer care enquiries and to enhance and improve the customers experience. We may also transmit your Personal Data to third party service providers, Affiliates, and Licensed Hotels 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 (e.g., a contractual obligation with regard to earning or redeeming BWR points or miles through our airline partners).
- **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 Best Western, 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.
- **Co-brand credit card:** To promote and assess eligibility for Best Western's co-brand credit cards.
- 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

- **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. Best Western 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 BWR, 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:** Best Western 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 Best Western's business, including operation of programs such as BWR and Best Western Travel Card. 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.
- **BWR Partners:** Best Western may also share your Personal Data with companies that we have partnered with or that are participants in our BWR program to allow you to earn and redeem rewards, points, or credits in connection with your BWR membership and in accordance with your chosen earning and spending preferences (e.g., selection of a particular airline partner through which you can earn BWR points).
- **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 Best Western's or the BW 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:** Best Western 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, Best Western, BW Group Companies, Licensed Hotels, Affiliates, 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 or those of any BW Group Companies, Licensed Hotels, or Affiliates; (v) to protect the rights, privacy, safety, or property of Best Western, BW Group Companies, Licensed Hotels, Affiliates, 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.
- **Credit Authorization:** When you apply for a Best Western co-brand credit card, your Personal Data will be used and disclosed to appropriate third parties in accordance with applicable laws for the purpose of determining whether you are eligible for the credit card and whether the card issuer will grant and/or maintain a line of credit to you.
- **Responsibility When Information Is Transferred.** If a service provider that receives Personal Information from us about an EU data subject or Swiss data subject takes an action that is contrary to the principles of the EU-US Privacy Shield or Swiss-US Privacy Shield, we shall be liable for those actions unless we prove that we are not responsible for causing them.

BWGB - CONTROLLER OF YOUR PERSONAL DATA

Best Western 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

Best Western 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 BW Group Companies, Licensed Hotels, Affiliates, 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 analyze 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 Best Western'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. It contains 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 multi-lingual 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 Best Western's behalf to track and analyze 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 user journey 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 Best Western International, Inc. 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 one of our central reservations agents to book with us over the telephone on 08457 74 74 74 or if you prefer you can always email us via reservations@bestwestern.co.uk.

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 and 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 (which may include the websites of Licensed Hotels, Affiliates, and various BWR partners or other third parties) are not under Best Western'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 Best Western or the BW Group Companies. 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, INCLUDING LICENSED HOTELS AND AFFILIATES.**

SECURITY

Because the security of your Personal Data is important to us, we have implemented security measures that provide reasonable precautions against the unauthorized 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 if we cannot disclose your Personal Data to Licensed Hotels or Affiliates, we may be unable to provide you with all or certain reservation services, other services, or membership-program-related benefits. Similarly, if we cannot disclose your Personal Data to other third parties, such as BWR partners (e.g., airlines, card issuers and other third parties), we may not be able to provide all of the available membership program services to you (e.g., earning of frequent customer points with such companies), or the provision of such services may be delayed).

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 to be 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 can [Opt-out here](#), or you can 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 going forward, 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 e-mails 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.

If you have a BWR account, we ask you to indicate your communication preferences at the time you become a member of the BWR program. Once you have indicated your preferences, you can change them by logging into your account.

Please note that if you opt-out as described above, we will not be able to remove your Personal Data from the databases of Licensed Hotels, Affiliates, or 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

Best Western may allow you to review certain Personal Data through the Site or through other online means. Information about the availability of reviewing 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 inquire whether we maintain Personal Information that relates to you. Although Best Western 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, Best Western may not be able to change, provide, or delete Personal Information about you if it would impose an undue burden or expense, or require Best Western to also change information relating to another person. For example, Best Western may not be able to change, provide, or delete Personal Information about you if it would impose an undue burden or expense, or require Best Western to also 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. Best Western 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, your membership number if applicable and details of your recent stay at a Best Western Hotel so we can ascertain your identity and whether we have any Personal Data regarding 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 Licensed Hotels, Affiliates, and other 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

Best Western only collects Personal Data that it believes is necessary to perform the services that you seek from Best Western 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 forth in the "Contacting Us" section of this Policy.

JURISDICTIONAL / DATA TRANSFER ISSUES

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. BWGB 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 in our sole discretion.

As an Affiliate of BWI, data submitted to and processed by BWGB is subject to transfer and storage within the United States of America. BWI 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. BWI 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 BWI'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 BWI'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 BWI has mishandled your Personal Information in violation of the Privacy Shield Privacy Principles, please contact BWGB using the details in the 'Contact Us' section of this Policy with a description of your complaint. After receiving such description, a representative from BWI's Customer Care Department will contact you to set up a time and manner to discuss your complaint. BWI is dedicated to addressing all legitimate complaints about its adherence to this Policy and the Privacy Shield Privacy Principles and will make a good faith effort to engage in communications to address such complaints. For unresolved complaints under the Privacy Shield Privacy Principles, BWI has agreed to participate in the JAMS EU Privacy Shield Program, an independent dispute resolution program. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by BWI, please visit the JAMS Program Website at <https://jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim> for more information and/or to file a complaint. If your complaint is not resolved by BWI, or through the JAMS process, under limited circumstances a binding arbitration option may be available before a Privacy Shield Panel.

By submitting any Personal Data to us, you consent to the transfer of such Personal Data to and 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. We have 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 BWI at Custserv@cs.bestwestern.com or by contacting our Customer Care Department as set forth below under "Contacting Us." Please note that in order to fulfil certain rewards, we must share your information with our BWI 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 BWI 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.

CONTACTING US

If you would like to update your information or modify your communication preferences, please contact us by e-mail at marketing@bestwestern.co.uk by phone at 01904 695482 or write to us at the following address:

Best Western GB, Amy Johnson Way, Clifton Moor, York, YO30 4GP

Should you have any questions about this privacy statement or your personal data, please contact our Data Protection Officer at dpo@bestwestern.co.uk or by phoning 01904 695400.

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

Best Western reserves the right to change, modify, or amend this Policy at any time. The date this Policy was last revised is at the top of this page. 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.