

Last Updated: 15 January 2010

PRIVACY POLICY

What this Policy Covers

This guest privacy policy ("Policy") describes how we at the Rezidor Hotel Group, acting through our Danish brand holding company Rezidor Hospitality A/S, or any of its affiliates ("Rezidor") collect, use, share, and protect our guests' personal information. "Personal information" is information, recorded in any format that identifies you personally, by itself or together with other information that is available to us.

This Policy does not apply to the practices of businesses or websites which we do not own or control, not to people we do not employ or manage. Rezidor holds a license to operate itself or allow others to operate hotels in Europe, the Middle East and Africa under the brands "Radisson Blu", "Park Inn", "Regent", "Country Inns & Suites" and "Hotel Missoni" (collectively the "Rezidor Brand Hotels").

Some of the Rezidor Brand Hotels are owned and operated by independent franchisees. **This Policy does not cover our franchisees' privacy practices.** When you provide personal information directly to one of our franchisees, the franchisee's privacy policy will apply. Please note that we require our franchisees to have privacy policies that are consistent with our Privacy Commitment and to comply with all applicable privacy and data protection laws, though their actual privacy policies may be different from this Policy.

Our sites may include links to other websites whose privacy practices may differ from those of Rezidor. In some cases, when linking to another site you may still see our branding even though you are actually reviewing content provided by a third party. If you submit personal information while on those sites, your information is subject to their privacy policies and you should review those policies.

Your Consent to This Policy

This Policy is part of the terms and conditions that govern your use of our services. By using our websites, the central reservation system, staying at any of the Rezidor Brand Hotels, you are agreeing for us to use your personal information in accordance with the applicable laws. We will keep your personal information as long as we need it for the purposes of which we collected it, or as permitted by law.

Personal information we collect about you

- We collect transactional information (such as your name, email address, telephone number, reservation data) as well as information you actively provide to us, for example, when you book a reservation through our central reservation service, stay at any Rezidor Brand Hotel, subscribe to any of our newsletters.
- We collect personal information about our guests from public sources and from other companies that have the right to share that information with us.
- If you provide us personal information about others, for example, in a "Send to a Friend" feature, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. We do not store this information.

We do not knowingly collect personal information from children

We do not knowingly collect personal information from children under the age of 13. If you believe your child has provided personal information to us, please contact us so that we can identify and delete your child's personal information.

Purpose for collection of your personal information

We use your personal information:

- to provide the services you request;
- to personalize your experience when you stay at a Rezidor Brand Hotel;
- to support the functionality and to personalize the layout and content of our websites to match your needs, interests and preferences;
- subject to your consent to send you promotional messages and special offers based on your privacy preferences;
- for security and fraud prevention purposes;
- to better understand our guests;
- to improve our programs, services and websites; and
- to better market our programs and services.

Use of your personal information for marketing purposes

You may choose whether you wish to receive marketing communications from us, and you may change your privacy preferences at any time by giving us written notice at the address communicated to you when subscribing and receiving marketing information or at the Rezidor Hotel Group's Data Protection Office.

If you choose not to receive any promotional communications from us, we will not send you purely promotional messages and will not share your personal information with other companies. We may still contact you for customer research or administrative purposes, such as confirming a reservation or transaction you've made.

Sharing of your personal information with others

We may share your personal information in the following ways:

- We share your personal information among the Rezidor companies to the extent necessary to ensure that your requested services are delivered to you in a satisfactory way; for that same purpose, we also share your personal information with Carlson Companies Inc., or any of its affiliates, if such is necessary to complete our services to you (for example, reservation, cancellation, booking changes, loyalty program membership, etc.).
- We share your personal information with companies that perform services on our behalf, such as companies providing application management and technical infrastructure support.
- Based upon your privacy preferences, we may share your personal information with other companies within the Rezidor Hotel Group, other companies selected by Rezidor, including strategic partners who will use it to send you promotions and special offers they believe will be of interest to you.

Our service providers, strategic partners, and Rezidor Brand Hotels are bound by contract to use the personal information we share with them only for the limited purposes for which we provide it to them and to take appropriate measures to protect the confidentiality, integrity and security of your personal information. They may not use or share your personal information in a manner that would be inconsistent with our promises to you, and they must comply with all applicable privacy and data protection laws.

We may transfer your personal information to another entity that has acquired the stock or substantially all of the assets of Rezidor, for example, as the result of a sale, merger, or reorganization, insolvency, dissolution or liquidation, provided that the acquiring entity's use of your personal information will still be subject to this Policy.

We may share or transfer your personal information to unrelated third parties, if disclosure is required to comply with a law, regulatory requirement, court order, or a subpoena; to cooperate with law enforcement or other governmental investigations; to protect your and our legal rights, property and safety, our employees, agents, other guests.

Protection of your personal information

We implement appropriate physical, technical and organizational security for the management and transmission of personal data, including appropriate security measures to protect such data from accidental or unlawful destruction or accidental loss, misuse, alteration, unauthorized disclosure or access and all other unlawful forms of processing.

Cross Border Transfer of your personal information

Our websites and databases currently reside on servers in Denmark and the USA; we cooperate with sub-contracted data processors in various countries. We request data processors to strictly adhere to the data protection legislation pursuant to the EU Directive 95/46/EC; and we instruct our partners accordingly; several data are sent on to the Carlson Companies Inc.'s server in the United States in order to affect reservations, cancellations, booking amendments in the central reservation system located in Omaha, Nebraska, USA. Different countries have different data protection laws, some of which provide more protection than others. If and when we transfer your personal information from one country to another country, we take appropriate measures to protect your privacy and personal information in accordance with the EU legislation for international data transfers (Safe Harbor Framework). By using our websites, participating in our programs, or staying at Rezidor Brand Hotels, **you are consenting to the transfer of your personal information to any country in the world** in accordance with the terms of this Policy.

Cookies and Other Web Technologies

When you visit one of our websites, we may use the following web technologies to collect the following types of information:

- We collect information that is sent to us automatically by your web browser when you access our websites. This information typically includes the IP address of your Internet service provider and the type of operating system and browser installed on your computer.

- A cookie is a small text file that is placed on your computer's hard disk by a web server. We use "Session cookies" to assign a randomly-generated unique identification number to your computer each time you visit one of our websites. A session cookie expires after you close your browser. We use session cookies to support the functionality of our websites - which pages they visit, which links they use, and how long they stay on each page. We may also use "persistent cookies." These cookies do not expire immediately after you close your browser, but stay on your computer until they expire after a period of time or you delete them. Each time you visit the same website, our web server will recognize the cookie on your computer's hard drive. By assigning your computer a persistent, unique identifier, we are able to create a database of your previous choices and preferences. In situations where these choices or preferences need to be collected again, they can be provided by us automatically saving you time and effort. Assigning your computer a persistent, unique identifier also helps us keep a more accurate account of how many people visit our websites, how often they return, how their use of our websites may vary over time, and the effectiveness of our promotional efforts. If you access our websites through an e-mail we have sent you or you've created a "user identity" during one of your visits, the information provided by our or our third party service provider cookies may be linked to information in our records that identifies you personally.
- The pages on our websites may contain electronic images known as "web beacons" - sometimes called "single-pixel gifs" or "clear gifs." We use these web beacons to learn more about the ways visitors use our web sites and to measure the effectiveness of our advertising campaigns. We may also include web beacons in promotional e-mail messages in order to determine whether messages have been opened and acted upon. We may link information obtained using any web beacons to other information that identifies you personally.

Modifications to this Policy

- We reserve the right, at our discretion, to make changes to this Policy at any time.
- We will notify you of any material changes to this Policy by posting a note on the top of the revised Privacy Policy section for at least 30 days after the new effective date to let you know what has changed. It is your responsibility to check our website periodically for changes to this Policy.
- If we make only minor changes to this Policy, we will replace this Policy with the new Policy and change the effective date at the top of this Policy. Minor changes include, for example, changes to our contact information or the examples contained in a section of this Policy.

Transparency

To review the information we have about you, contact us at Rezidor's Data Protection Office (as set out below) and request that a copy of your personal profile be delivered to your home or e-mail address. We will use secure means to confirm your identity to prevent the wrong people from accessing your information. If you have corrections, we will respond to your request within a reasonable delay. To remove your information from our files, contact us to request that all information pertaining to you be deleted.

The Rezidor Hotel Group's Data Protection Office

Avenue du Bourget 44

1130 Brussels

Belgium

Tel : +32 2 702 9200

Fax: +32 2 702 9300

Email: privacy@rezidor.com

PRIVACY PROMISES

Within the Rezidor Hotel Group we take data privacy protection seriously. Here are our ten promises to you as our hotel guest or visitor of our websites:

1. **Notice.** When we collect your personal information, we will give you timely and appropriate notice describing what personal information we are collecting, how we will use it, and the types of third parties with whom we may share it.
2. **Choice.** When subscribing to any of our newsletters or participating in our marketing events we will give you choices about the ways we use and share your personal information and we will respect the choices you make.
3. **Relevance.** We will collect only as much personal information as we need for specific, identified purposes, and we will not use it for other purposes without obtaining your consent.
4. **Retention.** We will keep your personal information only as long as we need it for the purposes for which we collected it, or as permitted by law.
5. **Accuracy.** We strive to ensure the personal information in our records is accurate.
6. **Access.** Upon your request we will inform you about your personal information stored in our data bases as required by law.
7. **Security.** We will take appropriate physical, technical, and administrative measures to protect your personal information from loss and unauthorized use, access, disclosure, alteration or destruction.
8. **Sharing.** Except as described in this Policy, we will not share your personal information with third parties without your consent.
9. **International Transfer.** If we transfer your personal information to a country outside the territory governed by the EU legislation (including Switzerland, Norway and Iceland), we will take appropriate measures to protect your privacy and the personal information we transfer in accordance with the applicable law.
10. **Enforcement.** We will regularly review how we are meeting these privacy promises.

To access your information, ask questions about our privacy practices, change your marketing preferences or issue a complaint, contact us at:

The Rezidor Hotel Group's Data Protection Office

Avenue du Bourget 44

1130 Brussels

Belgium

Tel: +32 2 702 9200

Fax: +32 2 702 9300

Email: privacy@rezidor.com