



CHOICE HOTELS INTERNATIONAL, INC. PRIVACY & SECURITY POLICY

Choice Hotels International, Inc. and its subsidiaries (“Choice”, “we” or “us”) are committed to providing you with an efficient and customized Internet experience. This online Privacy and Security Policy describes the information we collect through our websites and personal devices, how we use that information, and how we protect your personally identifiable information. This policy also sets forth our practices for obtaining personal information from other sources, such as written or verbal communications or information collected at a hotel.

This policy was last modified on February 13, 2023.

Hotels franchised under Choice’s brand (“Franchised Hotels”) are independently owned and operated. Your personal information collected or maintained directly by the Franchised Hotels is not subject to this policy, unless such information has been shared with us, in which case the policy only covers Choice’s collection, use, and maintenance of your personal information. If you book a reservation directly with a hotel and that hotel utilizes our proprietary property management system, your personal information related to that reservation will be transmitted to and processed by Choice. We do not control the collection, use, or access of your information by the Franchised Hotels and their staff. The Franchised Hotel is the merchant who collects and processes credit card information and receives payment for your stay. The Franchised Hotels are subject to the merchant rules of the credit card processors they select, which establish credit card security rules and procedures.

By submitting your personal information to us, you agree to the transfer to and processing of your personal information in the United States in accordance with the terms of this Policy.

WHAT INFORMATION DO WE COLLECT?

Our websites and mobile applications may receive and store information based on your browser settings, which may include your browser type and operating system, the various Choice web pages you view, Internet Protocol addresses, unique device identifiers, and sites visited before viewing our websites. When applicable, we may compensate other websites that include links to our websites. If you have enabled the location settings on your device while our mobile app is open, we may also receive your precise geo-location information. If you have location settings turned off while our mobile app is open, we may receive your general location (country, state, city) information.

When you use our reservation system, call our toll-free reservation telephone number, become a Choice Privileges® member, create an online account, elect to receive offers, respond to our surveys, or purchase a gift card, we collect personally identifiable information and other information that you supply, such as your name, address, telephone number, e-mail address, room preference, credit card details, day and month of your birth date, range of income, purposes of your stays at Choice properties, Choice

Privileges number, and, for those who qualify under the Choice Privileges program, military-related information such as branch of service and military status. We may also ask for additional information such as an association number (e.g., AAA), corporate account number or group booking number.

If you choose to earn airline miles or other third-party loyalty program points for your award-eligible stay at a Franchised Hotel, we will ask you to provide us your membership number for such loyalty program.

Choice may occasionally conduct sweepstakes and contests that offer you the opportunity to win prizes. As part of entering a sweepstakes, certain personally identifiable information such as name, mailing address, e-mail address and Choice Privileges number may be required.

When you request information regarding franchise opportunities from our informational website <http://www.choicehotelsfranchise.com> or elsewhere, we may collect information such as your contact details, your hotel ownership or development experience, the brand you are interested in, and the anticipated investment amount.

Children's Privacy: Our websites are not intended for children and we do not knowingly solicit or collect personal information for persons under the age of 18.

HOW DO WE USE THE INFORMATION WE COLLECT?

We do not sell, trade, rent, or release your personal information to anyone outside our company, contractors, affiliates or Franchised Hotels, other than in compliance with this privacy and security policy. We and our affiliates use the personal information to administer our business activities, provide customer service, personalize your digital experience, contact you concerning your stay with a Franchised Hotel, and make other products and services available to you. We share your information with our Franchised Hotels, credit card issuers, and other companies where necessary to complete your transaction. We may also use your information to send you promotional communications by mail or e-mail, or through our mobile apps, or share your information with our business partners.

RESERVATIONS

We maintain a centralized reservations system that retains your personally identifiable information when you make a reservation for a Franchised Hotel via our worldwide accessible websites, mobile apps, our call centers, the Franchised Hotels, and third-party travel agents and travel websites that connect to our reservation system. The personal information collected in the reservation system is needed to secure and process your reservation. Your personally identifiable information (including credit card number) will be processed primarily in the United States to complete your transaction and to facilitate the making of future reservations. Only that personal information which is reasonably required to facilitate your reservations is collected and shared between Choice and the Franchised Hotels.

We will use your e-mail address to send a confirmation and, if necessary, might use the other information to contact you regarding your reservation. We may also use your e-mail address to:

- send you travel-related messages, stay details, and provide other information about the area and the Franchised Hotel;
- notify you about special offers and promotions; and
- send you periodic satisfaction or market research surveys.

Such information may also be sent to you through our mobile apps, if you elect to receive notifications and alerts.

MARKETING, SWEEPSTAKES & CONTESTS

We may use your personal information to send you via e-mail, telephone, mobile app or postal mail promotions, surveys, third party offers, sweepstakes and contests.

CHOICE PRIVILEGES MEMBERS

If you are a Choice Privileges member, we will use your personal information to perform certain administrative tasks necessary for the administration and operation of the program such as: (1) allowing you to earn Choice Privileges points for point-eligible stays at various Franchised Hotels; and (2) redeem Choice Privileges points for free nights and other rewards offered by the program.

We may also use your personal information to send you via e-mail, telephone, mobile app or postal mail program details, account summaries, satisfaction surveys, promotions, third party offers, sweepstakes and contests. We may also contact you about applying for the Choice Privileges Visa® card issued by Barclays Bank Delaware (Barclay card member FDIC, pursuant to license from Visa USA Inc.).

Choice Privileges members' personal information may be collected through Choice's websites, mobile applications, Choice's call centers, paper applications, or may be passed on to Choice by Franchised Hotels. Choice may transfer personal information to Franchised Hotels as a part of administering the Choice Privileges program as outlined above. Choice processes Choice Privileges members' personal information primarily in the United States.

E-FOLIO

If you participate in the electronic billing e-folio program, your hotel bill will be sent to you over the Internet in an unsecure (unencrypted) manner – by email or through our mobile applications, depending on your preference and selection - and could be subject to interception by third parties. If you use a corporate credit card, billing information and the details of your hotel stay will be shared with the credit card provider who, in turn, will provide it to your employer.

OTHER USES OF PERSONAL INFORMATION

To serve you better, Choice may combine information you give us online, at Franchised Hotels, through the mail, or in any other way. Choice may also combine that information with publicly available information and information Choice receives from others or cross-

references. Choice uses that combined information for the purposes described in this privacy statement.

To the extent required or permitted by law, we may collect, use and disclose personal information in connection with security-related or law enforcement investigations or in the course of cooperating with authorities or complying with legal requirements. We may also use your information as permitted by law to perform credit checks, report or collect debts owed, or protect the rights or property of Choice, our employees, our Franchised Hotels, our customers, this site, or its users.

DO YOU SHARE MY PERSONAL INFORMATION WITH THIRD PARTIES?

As noted above under “Reservations,” Choice will need to transfer your personal information to Franchised Hotels to secure your reservation or in connection with awarding or redeeming Choice Privileges points. Please note that some hotels may be in countries other than your country of residence and may not provide an equivalent level of data protection.

Choice distributes personal information about guests and Choice Privileges members to third party service providers such as web analytics companies, market researchers and fulfillment houses. We also use such third parties to: (a) conduct data processing for Choice, (ii) engages in e-mail and direct mail communications on behalf of Choice, (iii) administer sweepstakes and contests, (iv) administer guest surveys, (v) compile information for us about the type and frequency of guest stays and the use of the Choice Privileges program by members, and (vi) compile information for us about the use of Choice’s websites and mobile apps. These parties are contractually prohibited from using personally identifiable information for any purpose other than the purpose that Choice specifies.

Choice may also distribute personal information to airline and other companies upon request of guests, in order to allow guests to: (is) earn frequent customer miles/points with such airline and other companies for stays at hotels, or (ii) redeem Choice Privileges points for goods and services of such airline and other companies.

Choice may partner with other companies to provide co-sponsored or co-branded promotions, sweepstakes, contests, products and services and may share your information with these companies.

As available in specified regions, if you choose to apply for a Choice Privileges Visa card, you will be linked from Choice’s website to Barclays Bank Delaware’s website and will be required to enter certain personally identifiable information as part of the credit application process. Please refer to Barclays Bank Delaware’s privacy statement posted on their website to understand how the information you supply will be used.

Although unlikely, in certain instances, Choice may disclose your personally identifiable information when Choice has reason to believe that it is necessary to identify, contact or bring legal action against persons or entities who may be causing injury to you, to Choice or to others. Choice may also disclose your personally identifiable information when Choice believes the law requires it.

We may disclose your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or

any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

HOW DO I OPT-OUT OF MARKETING COMMUNICATIONS OR OTHERWISE CHANGE MY PRIVACY PREFERENCES?

We respect the right of each visitor to control how his or her personal information is used. If you do not want us to provide your information to our business partners, or if you do not wish to receive promotional communications from us or our affiliates concerning special offers, discounts, airline bonuses, or contests, select one of the following options to provide us with your privacy preferences:

[Click here](#) if you have an Online Account and edit your privacy preferences within your account.

- OR -

If you do not have an online account and do not wish to create one, [click here](#) to provide us with your privacy preferences.

- OR -

Use the “Unsubscribe” function in the e-mail you received from us.

You can also e-mail us at privacyinquiry@choicehotels.com or write to Choice Hotels International, Attention: Privacy Officer, 18615 Claret Drive, Scottsdale, AZ 85255. Please include your name, address, e-mail address and Choice Privileges number (if applicable) and clearly state the nature of your request.

Choice makes every reasonable effort to maintain the accuracy of personal information. If you become aware that information Choice maintains about you is incorrect or if you would like to update your information, please contact us as indicated above.

HOW DO YOU STORE AND SECURE MY PERSONAL INFORMATION?

Our reservation system and other databases are maintained in the United States; therefore, your personal information will be collected (or transferred) and maintained in the United States. Once your information reaches us, we treat it as confidential and protect it through a variety of generally accepted industry standards.

When you provide us with information through this site, such as your name, address, phone number, credit card information and room preference, your information will be encrypted using a Transport Layer Security or a Secure Sockets Layer connection. You can tell if your information is encrypted by looking for the locked padlock icon on the lower right-hand or left-hand corner of your screen and a change in the site address from “http” to “https.”

DO YOU USE “COOKIES” AND SIMILAR TECHNOLOGIES?

Choice’s Websites, mobile applications and e-mails may use “cookies” and other computer code processes. These are small amounts of computer code that interact with your computer, mobile device, browser or e-mail. The types of cookies Choice uses are referred

to as “session” cookies and “persistent” cookies. Session cookies are temporary and are automatically deleted once you close your internet browser. Persistent cookies remain on your computer hard drive or mobile device until you delete them or are otherwise removed upon expiration. Cookies are required for the online reservation process so that we can keep your information on multiple pages throughout the process. Additionally, Choice uses cookies to remind us of who you are, tailor our services to suit your personal interests, track your status in our promotions, contests and sweepstakes, and/or analyze your visiting patterns. Choice does not use cookies to ascertain any personally identifiable information about you apart from what you voluntarily provide Choice.

Choice may also use cookies to form an association between multiple devices such as your smartphone, desktop computer and tablet. This is often referred to as device fingerprinting. A unique identifier, or fingerprint, is created on your devices, which enables the association. Choice uses the device association to link your devices’ searches on our websites, which enables us to provide you with a more convenient and personal digital experience.

You can generally set your browser to not accept cookies or to notify you when you are sent a cookie, giving you the chance to decide whether or not to accept it. Not accepting cookies will adversely affect your ability to perform certain transactions and functions on Choice Websites.

Choice uses pixels or transparent GIF files to help manage its online advertising. These files enable Choice and its advertising partners to recognize unique codes on your web browser, which in turn, enable Choice to learn which advertisements bring users to its websites. The information that Choice collects and shares is anonymous and not personally identifiable. It does not contain your name, address, telephone number, or e-mail address.

Do Not Track Signals: Some web browsers offer a "Do Not Track" ("DNT") signal that is an HTTP header field indicating your preference regarding tracking or cross-site user tracking. We currently do not recognize DNT signals; however, we do allow you to exercise some choice in the information collected by adjusting your browser’s cookie settings.

GOOGLE ANALYTICS

This website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to identify you as a unique user and help analyze how users use this site. The information generated by the cookie about your use of the website (including your IP address, but not your name or other identifying information) will be transmitted to and stored by Google on servers in the United States. This information is used for the purpose of evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage. The ad formats we utilize through Google include Audience Remarketing on Google’s Display and Search Network.

You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore, you can prevent Google’s collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available for various browsers located at <https://tools.google.com/dlpage/gaoptout>.

Additional information concerning Google's data privacy policy and other associated topics can be found at <https://support.google.com/analytics/answer/6004245>.

DO YOU USE INTEREST-BASED ADVERTISING?

Choice partners with third party ad networks to either display advertising on Choice websites or to manage its advertising on other sites. Choice's ad network partners use cookies and web beacons to collect non-personally identifiable information about your activities on Choice's websites and other sites to provide you targeted advertising based upon your interests. If you wish to not have this information used for the purpose of serving you targeted ads, you may opt-out by clicking here: <http://preferences-mgr.truste.com>. Please note this does not opt you out of being served advertising. You will still receive generic ads. Also, opting out of ad network cookies does not opt you out of cookies used for device association described in this privacy statement.

If you would like to know more about cookies, the website www.allaboutcookies.org provides useful information.

We also work with third parties that use tracking technologies on our Web sites in order to provide tailored advertisements on our behalf and on behalf of other advertisers across the Internet. These companies may collect information about your activity on our sites and your interaction with our advertising and other communications, and use this information to determine which ads you see on third party websites and applications. If you wish for more information about this practice and to understand your options, please visit www.aboutads.info.

DO YOU USE MY DEVICE'S GEO-LOCATION DATA?

Our mobile apps may use your device's Global Positioning System (GPS) or other technology to locate a hotel near you and/or to provide you with other relevant location-based information and/or services. Your location may be shared with Choice business partners to make services or products available to you, such as food delivery or local entertainment. While you have Choice's mobile app open, Choice and its business partners may track the device's precise location unless you have opted out of such sharing through your device's settings. When your device's location settings are turned off but the mobile app is open, Choice and its business partners may collect general location information (country, state, city) via IP address or other device information. The last location of your mobile device when the mobile app was open may be stored by Choice and/or its business partners for marketing purposes – for example, sending special offers to users whose last known location was in a particular city or region. Business partners who have access to your precise and/or general location information may use the information only in support of Choice's purposes described in this privacy policy.

To the extent any geo-location data is combined with personal information, that information will be treated as personal information in accordance with this policy.

WHAT IF I APPLY FOR A CAREER AT CHOICE HOTELS ON CHOICEHOTELS.COM?

If you apply online for employment at Choice, you may be asked to provide us your name, address, e-mail and resume. Choice will use this information solely with respect to your job search and to determine your qualifications for a career with Choice.

DOES THIS POLICY COVER OTHER SITES LINKED FROM CHOICEHOTELS.COM OR CHOICE'S MOBILE APPS?

Choice is only responsible for the privacy and security policy and content on this website and Choice's mobile apps. ChoiceHotels.com and our mobile apps may redirect to other websites and mobile apps. Those websites and mobile apps are not covered by this privacy and security policy, and we are not responsible for the privacy practices or the content of those other websites and mobile apps.

WHAT ABOUT CHANGES TO THE PRIVACY AND SECURITY POLICY?

By using our site you consent to our collection and use of your personal information as described in this policy. Choice reserves the right to modify this privacy and security policy and related business practices at any time by posting updated text on this site. Any changes to this policy become effective upon posting of the revised policy to this site. Use of the site following such changes constitutes your acceptance of the revised policy then in effect.

WHAT IF I HAVE QUESTIONS OR CONCERNS?

Thank you for visiting our site and for taking the time to read this policy. If you have questions about this policy or complaints about how we collect, use, disclose, store or protect your personal information as directed by the laws and regulations applicable to your region, we can be reached by email at privacyinquiry@choicehotels.com or by writing to us at Choice Hotels International, Attention: Privacy Officer, 18615 Claret Drive, Scottsdale, AZ 85255.

HOW DO YOU RESOLVE COMPLAINTS?

We will work with you to address complaints, which may include contacting applicable authorities as part of the resolution process.

WHAT IF THERE'S A DIFFERENCE BETWEEN VERSIONS OF THE PRIVACY AND SECURITY POLICY?

As a service to our customers, we make this privacy and security policy available in several different languages. In the event of any discrepancies between the various translations of the policy, the English version of the policy is the authoritative one.

WHAT ARE MY PRIVACY RIGHTS AS A CALIFORNIA RESIDENT?

This section contains disclosures required by the California Consumer Privacy Act of 2018 ("CCPA") and applies only to personal information that is subject to the CCPA.

PERSONAL INFORMATION WE COLLECT, DISCLOSE BUSINESS PURPOSES, AND SELL

The information we collect and disclose for business purposes is the same for guests from all geographies and is discussed in our general privacy policy. Please review the general policy for this information. If you stayed at a Choice Hotels property, visited our website, or are a Choice Privileges member, the personal information collected in the past 12 months is the same as what is described in the general privacy policy. Further, if you stayed at a Choice Hotels property, visited our website, or are a Choice Privileges member, the personal information disclosed to third parties for business or commercial purposes is discussed in the general privacy policy.

Regarding selling personal information as defined in the CCPA, selling of personal information is limited to allowing a restricted number of media companies access to our website's information such as browsing history, search history and information regarding consumers' interaction on our website.

CATEGORIES OF SOURCES

We collect personal information from the following categories of sources:

- Consumers (including information you provide and information that other customers may provide us about you such as for group bookings);
- Affiliates of Choice Hotels International;
- Choice Hotels properties, whether they are franchised or owned by Choice Hotels International;
- Social networks;
- Publicly available information.

WHY WE COLLECT, USE, AND SHARE CALIFORNIA INFORMATION

We use and disclose personal information we collect for our commercial and business purposes, as described in our privacy policy. These commercial and business purposes include, without limitation:

- Our commercial purposes, including marketing, advertising, sweepstakes, facilitating transactions, and co-sponsored and co-branded promotions, sweepstakes, contests, products and services;
- Our business purposes as identified in the CCPA, which include:
 - o Auditing and analysis related to our interactions with you;
 - o Legal compliance;
 - o Detecting and protecting against security incidents, fraud, and illegal activity,
 - o Debugging;
 - o Performing services such as account servicing, processing reservations and payments, and analytics;
 - o Internal research for technological improvement;
 - o Internal operations;
 - o Activities to maintain and improve our services;

- To facilitate services you request
- In the event of reorganizations, mergers, sales, joint ventures, assignments, transfers or other disposition of all or a portion of our business assets or stock.

RECIPIENTS OF CALIFORNIA PERSONAL INFORMATION

We disclose the categories of personal information designated in our privacy policy to the following categories of third parties for business purposes:

- Service providers (such as web analytics companies, market researchers and fulfillment houses);
- Affiliates of Choice Hotels International;
- Government entities;
- Legal entities;
- Advertising networks;
- Internet service providers;
- Data analytics providers;
- Operating systems and platforms; and
- Social networks
- Business partners offering co-sponsored and co-branded promotions, sweepstakes, contests, products and services.

YOUR RIGHTS REGARDING PERSONAL INFORMATION

California consumers have certain rights with respect to the personal information collected by Choice. If you are a California resident, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:

- The **right to know** the categories and specific pieces of personal information we collect, use, disclose, and sell about you, the categories of sources from which we collected your personal information, our purposes for collecting or selling your personal information, the categories of your personal information that we have either sold or disclosed for a business purpose, and the categories of third parties with which we have shared personal information;
- The **right to request that we delete** the personal information we have collected from you or maintain about you;
- The right to **opt out of our sale(s)** of your personal information. Please note that if you opt out of certain types of sales, we may be unable to provide you with the services that rely on such sales;
- The **right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA.

To exercise your **right to know** or **right to request that we delete**, please submit your request by calling us at 1-800-300-8800 or sending an email to privacyinquiry@choicehotels.com. To exercise your right to **opt out of our sale(s)**, please click on the 'Do Not Sell My Personal Information' link in the footer of our choicehotels.com website.

VERIFICATION PROCESS AND REQUIRED INFORMATION

To help protect your personal information, we will request information from you to verify your identity and understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, your first and last name, your current address, the telephone number used when making reservations, your email address and, if you are a member of our loyalty program, your Choice Privileges account number. The personal information you provide will be used only for authentication.

AUTHORIZED AGENT

You may designate an authorized agent to make a CCPA request on your behalf by submitting a declaration form. The form can be requested by contacting us at 1-800-300-8800 or sending an email to privacyinquiry@choicehotels.com.

MINORS' RIGHTS TO OPT IN

Our websites are not intended for children and do not purposefully solicit, collect, or sell personal information of persons under the age of 18.

INQUIRIES

If you have questions about this policy or complaints about how we collect, use, disclose, store or protect your personal information as directed by the laws and regulations applicable to your region, we can be reached by email at privacyinquiry@choicehotels.com or by writing to us at Choice Hotels International, Attention: Privacy Officer, 18615 Claret Drive, Scottsdale, AZ 85255.