

**Last Updated: May 26, 2023**

## **Privacy Notice to Business Relations**

### **Introduction**

**Travel + Leisure Co.**, business operations include many subsidiary entities and consists of brands including RCI, Panorama Travel Solutions, 7Across (formerly DAE), The Registry Collection, TripBeat, @Work International, and Alliance Reservations Network (collectively "T+L," the "**T+L Group of Companies**" "we", "us", or "our").

The T+L Group of Companies receive products and services from multiple suppliers as well as provide a wide range of products and services to individual consumers and to businesses or other organizations through our websites, mobile and software applications, social media pages we control, and other online and offline activities such as when you provide your information on the phone via our call centers or in person (collectively, the "**Services**"). When Services are provided to or received from business, enterprise or other organizations but not an individual consumer contracting directly with us, it is referred to as "**B2B Services**."

The T+L Group of Companies care about privacy issues and wants you to be familiar with how we collect, disclose, and otherwise use ("**Process**") information about you, including information that identifies or relates to you as an identifiable person ("**Personal Information**").

### **Scope and Application**

This Privacy Notice to Business Relations (this "**B2B Privacy Notice**") describes how the T+L Group of Companies Processes Personal Information about employees or representatives of our existing and prospective business clients, suppliers, service providers, agents, consultants, advisors, business partners, and investors ("**Business Relations**").

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements, such that our practices may be more limited in such jurisdictions.

Our privacy practices also may vary among entities within the T+L Group of Companies as well as amongst and between Travel + Leisure Co. and any of its other affiliated operating entities ("**T + L Affiliates**") depending upon their function and their offered products and services. Please review the privacy notices linked to or referenced in their respective Services and note that the data controller of your Personal Information will be the T + L Affiliate which provides the Services to you.

**California Residents:** Click [here](#) to read about "**Your California Privacy Rights**"

If you or your company or organization have separate contractual agreements with us concerning our collection, use, or disclosure of your Personal Information, those agreements control and supersede anything stated in this B2B Privacy Notice.

### Individual Access

This B2B Privacy Notice does not apply to our processing of Personal Information (as defined in the respective privacy notices) about individual consumers (interacting with us in their personal capacity), our employees or our contractors (whether directly or indirectly contracted). Please refer to the privacy notice linked to the specific Service for more information.

Please note that your access to and use of our B2B Services may be administered by your company or other organization to which you are a member. In such cases, authorized personnel at your organization may have access to your Personal Information collected by these B2B Services, and your organization may have policies applicable to your use of them. The T+L Group of Companies is not responsible for our Business Relations' policies and practices related to data privacy and security, which may be different from this B2B Privacy Notice and any applicable specific privacy notices. If your organization is administering your use of our B2B Services, please contact your company with any privacy questions or requests related to your use of the specific B2B Service.

### Information We Collect and How It Is Collected

Most of the Personal Information that we handle in connection with the B2B Services is not collected on this website, but rather through separate contractual relationships governing our collection, use, or disclosure of your Personal Information.

When you access this website or engage with us by email or other transaction or interaction, we may collect the following Information, including any of the following as private contact information or business contact or other information:

#### **1. We may collect Personal Information about you such as your:**

- Name
- Title, rank or other designation held within your organization
- Business or organization name
- Postal address (including billing and shipping addresses)
- Phone number
- Email address
- Billing and financial details, including payment, insurance, fiscal and banking data
- Social media account information

- Stay, trip, product or service information, such as your preferred location/facilities, dates and number of people/children travelling with you
- Special needs or conditions that may impact your visit to our facilities
- Driver's license, government-issued ID, or passports
- Birthday and/or date of birth
- Geolocation information
- Communication, product, service or other preferences
- Your opinions, comments, suggestions, inquiries and other communications you provide to us
- Demographic information
- Audio/Visual recordings such as when you call our customer service phone number or participate in having a photo taken for an activity, resort, etc.
- Internet Click Activity on our websites
- IP address or Device ID
- Account registration ID and password
- Passwords
- **Screening.** Information required to screen individuals such as directors, officers, sole proprietors, and equity holders of our current and potential counterparties. This screening takes place against publicly available or government issued-sanctions lists and media sources.

The foregoing may include private contact information (versus business contact information), if necessary. It is possible that you may submit other Personal Information to the T+L Group of Companies, for example in a question you ask through a contact page or submit in the comment box with your order.

**2. We may collect information from you when you interact with us such as when you:**

- Register for, subscribe to, use, or make a payment for a B2B Service
- Contact us with a question or request
- Use our Services
- Provide a review or comment
- Participate in a competition, promotional activity or sweepstakes
- Provide feedback or participate in a survey
- Participate in any loyalty or other programs
- “Like”, “Follow” or otherwise connect with or post to one of our social media pages
- Provide goods or services to us

### 3. Other information we collect about you:

- **Cookies:** Our Services may use “cookies” and similar technologies (collectively, “cookies”). Cookies are small text files this Website sends to your computer for recordkeeping purposes; this information is stored in a file on your computer's hard drive. Cookies make web surfing and browsing easier for you by saving your preferences so we can use these to improve your next visit to our Website.
  - One purpose of cookies is to simplify the use of the Website. For example, cookies may save a user's login details, so that they do not need to login every time.
  - Cookies may be either “persistent” or “temporary” (or “session”) cookies. A persistent cookie retains user preferences for a particular Website allowing those preferences to be used in future browsing sessions and remains valid until its set expiry date (unless deleted by the user before the expiry date). A temporary cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
  - Cookies are also used for statistical or marketing purposes, to determine how the Website is used. These cookies are provided by us or by third-parties (e.g., advertising partners). While we do not control or have access to the advertiser cookies we do permit them to be used on this Website to facilitate tailored advertising and monitor patterns of buying specific goods or interest in - for example, holidays or hobbies. These cookies run advertisements tailored to the user based on your online buying habits.
- **From Other Sources:** We may receive your Personal Information from other sources, such as public databases, joint marketing partners, data firms, social media platforms, from people with whom you are friends or otherwise connected on social media platforms, as well as from other third-parties.
- **Mobile Devices:** When you use or access our Services from a mobile device, we may collect information such as your unique device ID and your location. If you download and use an App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number, as well as any other Personal Information specified by the App in its terms or notices.
- **Google Analytics:** We use Google Analytics to help us get a better understanding of how visitors use this Website and to facilitate interest-

based advertising associated with your Google Account and other devices you use. The information generated by the Google Analytics cookie about your use of this Website is transmitted to and stored by Google. If you do not want your activity on this Website to be tracked by Google Analytics, you may opt out by using this link: <http://tools.google.com/dlpage/gaoptout?hl=en>.

- **Internet Based Advertising:** We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use our Services and other websites, apps or online services, based on information relating to your access and use of our Services and other websites, apps and services on any of your devices, as well as information received from third-parties. To do so, these companies may place or recognize a unique cookie on your browser (including through the use of pixel tags). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Notice, please visit [www.aboutads.info](http://www.aboutads.info) and [www.networkadvertising.org](http://www.networkadvertising.org) to opt out in mobile apps. You may also opt out in Twitter by going to your account privacy settings and unchecking the box next to “Tailor ads based on information shared by ads partners.”

- **Do Not Track Signals:** 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 websites, including when you visit our website. You can learn about how to exercise choice regarding the collection of information about your online activities over time and across third-party websites or online services by visiting <http://www.aboutads.info/> and <http://www.networkadvertising.org/>.

- **Data Collected Automatically:** In addition to any Personal Information or other information you choose to provide to us or that we otherwise collect about you as described in this Privacy Notice on the Services, we and our third-party service providers may use a variety of technologies, now and hereafter devised, that automatically collect certain website

usage information whenever you visit or interact with the Services. This information may include browser type, operating system, the page served, the time, the source of the request, the preceding page view, and other similar information. We may use this usage information for a variety of purposes, including to enhance or otherwise improve the Services. In addition, we may also collect your IP address or some other unique identifier for the particular device you use to access the Internet, as applicable. When analyzed, usage information helps us determine how our Services are used, such as what types of visitors arrive at the Services, what type of content is most popular, what type of content you may find most relevant and what type of visitors are interested in particular kinds of content and advertising. We may associate your website usage information with the Personal Information you provide, but we will treat the combined information as Personal Information.

We use information in a variety of ways, including to analyze site traffic, understand customer needs and trends, carry out targeted promotional activities and to improve our services.

As aggregated, de-identified or anonymized information does not constitute Personal Information, we may use it for any purpose.

## **Why and How We Use Your Information**

**We may Process Personal Information in connection with any of the following:**

### **1. Our business transactions with you, including, but not limited to:**

- Entering into or performing a contract with you.
- Responding to your inquiries and fulfilling your requests.
- Sending administrative information to you, for example, information regarding the B2B Services or an event you are attending.
- Completing and fulfilling any purchases or requests for B2B Services.

### **2. For our legitimate business interests, including, but not limited to:**

- Personalizing your experience on the Services by presenting products and offers tailored to you.
- Allowing you to participate in sweepstakes, contests, and similar promotions, and administering such activities (each of which may have additional rules and

could contain additional information about how we Process your Personal Information).

- Facilitating social sharing functionalities of your social media account(s).
- Carrying out data analysis, audits, fraud monitoring and prevention, internal quality assurance, developing new products, enhancing, improving or modifying our Services, identifying usage trends, auditing use and functionality of our Services, helping enforce compliance with our Terms of Use, helping protect our Services, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.
- Subject to your marketing preferences (which may include consent to marketing under applicable law), to send you newsletters or marketing communications we believe may interest you, for our own products and services, and on behalf of our Affiliates or selected third-parties in accordance with applicable law.

**3. In accordance with any consent you may have provided.** You have the right to decline to provide your consent and, if consent is provided, to withdraw it at any time.

**4. As necessary or appropriate for legal reasons, including, but not limited to:**

- Under applicable law.
- Complying with legal process.
- Responding to requests from public and government authorities, including those outside your country of residence.
- Enforcing our terms and conditions in connection with the Services or any B2B Services.
- Protecting our operations or those of any of our Affiliates, or other third-parties.
- Protecting our rights, privacy, safety or property, or that of our Affiliates, you or other third-parties.
- Allowing us to pursue available remedies or limit damages we, our Affiliates, or other third-parties, may sustain.

## **When We Disclose Your Information**

**We may disclose your information as follows:**

- **Affiliates:** We may disclose your Personal Information to any other entity that is directly or indirectly controlled by, or under common control with us, including but not limited to any member of the T+L Group of Companies (“**Affiliates**”) for the purposes described in this B2B Privacy Notice, including under “**Why and How We Use Your Information,**” unless otherwise

prohibited by applicable law. You can find more information about our primary operating Affiliates in our Annual Report as of the date the Annual Report was published or by contacting us at the contact information set forth below in the section titled “[How Can You Contact Us?](#)”.

- **Vendors and Service Providers:** We may disclose your Information to vendors and service providers we retain in connection with our business such as: travel services companies, financial services companies, property owners’ associations, vacation insurance companies, website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, credit card processing, tax and financial advisers, legal advisers, accountants, auditing services or others.
- **Business Partners, Sponsors, and Other Third-Parties:** We may disclose your Information to other Business Relations, co-sponsors of promotions, and other third-parties in order to provide you with B2B Services that may interest you. For example, we may co-sponsor promotions, sweepstakes, or other events with a third-party and may share your Information in connection with these events. If you provide additional information to any of these third-parties, such information provided to these third-parties will be subject to each third-parties’ own privacy practices and policies.
- **Message Boards:** We may make reviews, message boards, blogs, and other such user-generated content facilities available to users. Any Personal Information disclosed in these areas becomes public information and you should always be careful when deciding to disclose your Personal Information. We are not responsible for privacy practices of other users including website operators to whom Information is disclosed.
- **Change in Control:** We may disclose your Information to a third-party (e.g., prospective buyers and insolvency practitioners) in connection with any change in control of any part of our business or the business of any of the T+L Affiliates, including, without limitation, merger, consolidation, divestiture, spin-off, purchase of all or a substantial portion of our assets, dissolution, liquidation, administration, receivership or other form of insolvency.
- **Disclosure Permitted by Law:** We may disclose your Information to law enforcement authorities, government or public agencies or officials, regulators, and/or to any other person or entity having appropriate legal authority or justification for receipt of your information, if required or permitted to do so by law or legal process, to respond to claims, or to protect our rights, interests, privacy, property or safety, and/or that of our Affiliates, you or other third-parties.



## Safeguarding Your Information

We will take reasonable steps to protect the Information you provide us from loss, misuse and unauthorized access, disclosure, alteration and destruction. We have implemented appropriate physical, electronic and managerial procedures to help safeguard and secure your Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Unfortunately, no security system is 100% secure, thus we cannot ensure the security of all Information you provide to us via the Services.

## Other Important Information

- **Information Provided on Someone Else's Behalf:** If you provide us with information about someone else, please ensure you have the person's permission to do so for the purposes detailed in this B2B Privacy Notice.
- **Links to Websites:** The Services may have links to other websites that are not operated by us; we have no control over how these websites may collect your Information and no liability for the practices, policies and security measures implemented on these websites. You should read the privacy notices on those other websites before you submit your Personal Information through them.
- **Social Media Sites:** Please note that we are not responsible for the collection, usage and disclosure policies and practices (including data security) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose to other organizations through or in connection with our applications or social media pages.
- **Sensitive Personal Information:** The Personal Information we collect from you may include sensitive Personal Information, which we only collect with your consent. We limit the use of your sensitive Personal Information to that use which is necessary to perform reasonably expected services or as required by law. If you refuse to provide such information, it may affect the delivery of our services or make us unable to provide services to you. However, unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any sensitive Personal Information such as Social Security number, passport number, driver's license number, or other government-issued identification number; financial account details, with or without any information that would permit access to the account, or credit history; or information on race, religion, ethnicity, sexual practices or sexual orientation, medical or health information, genetic or biometric information,

political or philosophical beliefs, trade union membership, background check information or criminal records.

- **Minors:** We do not knowingly collect, maintain or use Information provided by individuals under 16 years of age in connection with, and no part of our websites, social media pages, and mobile and software applications is directed to, individuals under the age of 16. If we do discover we have collected Personal Information from minors in violation of applicable law, we will delete it.
- **International Transfers:** We are an international company and we may, subject to applicable law, transfer your Personal Information, to any of the T+L Affiliates or selected third-parties outside the country where you are located and where information protection standards may differ (e.g., your Personal Information may be stored on servers located in other jurisdictions). We will utilize appropriate safeguards governing the transfer and usage of your Personal Information.
- **Retention Period:** We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this B2B Privacy Notice unless a longer retention period is required or permitted by law.
- **Changes to Our Privacy Notice:** From time to time we may revise this B2B Privacy Notice. Updated versions will be posted on the respective Services.

## Your Choices and Rights

- **Changes to Your Marketing Preferences:** You can change your marketing preferences by:
  - Using the unsubscribe function in the email you receive from us;
  - Logging into your account (if the Service offers an account with such functionality); or
  - Contacting us as set forth under “[How Can You Contact Us?](#)” below.
- **Withdrawing Your Consent:** You may withdraw any consent you have provided to us to Process your information at any time.
- **Accessing your Information:** In accordance with applicable law, you may access the Personal Information we Process about you.
  - Any request to access or obtain copies of your Personal Information must be made in writing by contacting us as set forth under “[How Can You Contact Us?](#)” below. We may also ask you to log into your account, verify your identity and to provide further details relating to your request.
- **Correcting your Information:** We will take reasonable steps to ensure the accuracy of the Personal Information we retain about you. It is your

responsibility to ensure you submit true, accurate, and complete information to us, and timely update us in the event this information changes. You may request that any inaccurate or incomplete Personal Information held by us or on our behalf is corrected, by contacting us as set forth under “[How Can You Contact Us?](#)” below.

- **Deleting your Information:** Under certain circumstances, you may request we delete Personal Information we hold about you by contacting us as set forth under “[How Can You Contact Us?](#)” below. We will assess your request and determine, under applicable law, whether we are required to delete this information.
- **Objecting to Processing:** If you would like us to stop Processing your Personal Information, you can request this by contacting us as set forth under “[How Can You Contact Us?](#)” below. We will assess your request and determine, under applicable law, whether we have any justification for the continued Processing.
- **Transferring your Information:** Under certain circumstances, you may receive your Personal Information in a format that allows you to send it to another company or to direct us to transfer it directly to another company.

## **Other Global Jurisdictions**

### **A. Your Australia Privacy Rights**

1. This section of our B2B Privacy Notice applies specifically to individuals located in Australia. If you are located in Australia, to the extent of any inconsistency between this section of our B2B Privacy Notice and the remaining sections of our B2B Privacy Notice, this section will prevail.
2. This B2B Privacy Notice applies to the T+L Group of Companies. Each entity in the T+L Group of Companies may share your Personal Information with other entities within the group.
3. Definition of “Personal Information”
  - 3.1. For individuals located in Australia, “Personal Information” includes an opinion about you.
4. By providing Personal Information to us, you consent to our collection, use and disclosure of your Personal Information in accordance with this B2B Privacy Notice and any other arrangements that apply between us. We may change our B2B Privacy Notice from time to time by publishing changes to it on our website.

We encourage you to check our website periodically to ensure that you are aware of our current B2B Privacy Notice.

5. In the course of providing you with products or services, we collect Personal Information in a variety of ways. Unless it is unreasonable or impracticable to do so, we collect your Personal Information from you directly. In some cases however, we will collect information about you from a third-party. For example, we may collect Personal Information about you from third-party service providers or agents assisting us to provide products or services to you.
6. Overseas disclosure of Personal Information
  - 6.1. As part of a global business, we may disclose your Personal Information to recipients that are located outside of Australia, including to our Affiliates located in the United States, United Kingdom, and Singapore.
  - 6.2. When you provide your Personal Information to us, you consent to the disclosure of your information outside of Australia and acknowledge that we are not required to ensure that overseas recipients handle that Personal Information in compliance with the Privacy Act 1988 (Cth) and the associated Australian Privacy Principles (APPs). We will, however, take reasonable steps to ensure that any overseas recipient will deal with such Personal Information in a way that is consistent with the APPs
  - 6.3. The privacy and collection practices of entities to which we disclose Personal Information are governed by their own privacy policies and collection notices.
7. Correcting Personal Information
  - 7.1. If you believe that the Personal Information we hold about you is inaccurate or incomplete, please contact us and we will use all reasonable efforts to correct the information.
  - 7.2. If we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the Personal Information stating that you believe the information is inaccurate, incomplete or out of date.
8. Complaints

- 8.1. If you have a complaint about our collection, use or disclosure of your Personal Information, or you wish to make a complaint about a breach of the APPs, please contact us at the details set out above. You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at [www.oaic.gov.au](http://www.oaic.gov.au).

## **How Can You Contact Us?**

If after reviewing this B2B Privacy Notice, you have any questions, complaints or privacy concerns, or would like to make any requests in relation to your Information, or obtain further information on safeguards used for international transfers please send an email to our Privacy Officer at [B2Bprivacy@travelandleisure.com](mailto:B2Bprivacy@travelandleisure.com) or send a letter to:

Travel + Leisure Co.  
Attn: Legal Services– Privacy  
6277 Sea Harbor Drive  
Orlando, FL 32821

If you have a complaint or concern about how we Process your Information, we will work to address such concern(s). Also, you may contact us at [B2Bprivacy@travelandleisure.com](mailto:B2Bprivacy@travelandleisure.com). You may also direct your complaint/concern to the applicable data protection authority.