

## MARRIOTT GROUP BUSINESS INTEGRITY LINE GLOBAL PRIVACY STATEMENT

**Date Effective:** December 1, 2023

The [Marriott Group](#) (“Marriott,” “We,” or “Company”) provides this Business Integrity Line (“BIL”) for the reporting and investigating of business integrity issues. The BIL is operated by NAVEX Global, Inc. (“Navex”), a U.S. company and independent service provider, on behalf of Marriott. Marriott, located at 7750 Wisconsin Avenue, Bethesda, MD 20814, United States of America, is responsible for, and is the data controller in respect of, Personal Data processed in connection with the BIL including any investigation and/or remediation actions relating to any Report (“BIL Process”).

### **SCOPE**

This Marriott Group Business Integrity Line Global Privacy Statement (“Privacy Statement”) covers the **Personal Data** of a **Reporter**, the **Subject of a Report**, and other third parties mentioned in a **Report**, as defined below. Unless otherwise noted, the information below applies to the Personal Data of all natural persons involved in a Report.

### **DEFINITIONS**

**Franchisees:** Franchisees include franchise entities that contract directly with a Marriott entity, franchisee employees, and any third-party operator and management company hired to manage the property.

**Personal Data:** Any information that is related to an identified or identifiable natural person. An “identifiable person” is a natural person who can be identified, directly or indirectly, by reference to an identifier such as a name, a unique identification number, an email or IP address, location data or other information associated with the individual, or other data specifically recognized as Personal Data by applicable laws, regulations or legal authorities.

**Report:** A submission made through the BIL.

**Reporter:** A person filing a Report.

**Sensitive Personal Data** is a type of Personal Data and includes (i) social security number, taxpayer identification number, passport number, driver’s license number or other government-issued identification number; or (ii) credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history, or (iii) information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records or information on other judicial or administrative proceedings.

**Subject of a Report:** A person against whom an allegation has been made in a Report.

## **CONFIDENTIAL, VOLUNTARY REPORTING AND REPORTING IN GOOD FAITH**

### **Confidential Reporting**

The BIL is a confidential, online reporting system that may be used by associates and others to report incidents in the areas of accounting, internal accounting controls, auditing matters, bribery, banking and financial crime, as well as other violations or issues, including violations of Marriott policies or the [Marriott Business Conduct Guide](#), as permitted by applicable law.

Please note that because of applicable laws, the Subject of a Report identified through the BIL may be informed that a Report has been made. However, except as otherwise required by law, or if such non-disclosure will hamper an investigation, the information provided by a Reporter will not reveal their name or identity. In addition, the Subject of a Report will have the right to respond to or correct information reported as permitted by applicable laws.

While Reporters should use the BIL to submit a Report, Reporters may make a submission to an enforcement agency or competent authority following an internal Report or directly without prior internal Reporting.

If you are not comfortable with the terms of this Privacy Statement, please do not use the BIL to submit your concern.

### **Associate Reporters: Voluntary Reporting in Good Faith; No Retaliation**

The use of the BIL is voluntary. You are encouraged to use the BIL if you are unable to use the Marriott internal reporting process, if you feel you would like to report anonymously, or a previously reported issue has not been addressed.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the Company's operations may result in decisions that affect others, including disciplinary actions. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct and accurate. The Company respects the confidentiality of associates who report a known or suspected violation. The Company has a "zero tolerance" policy against retaliation and will not tolerate any kind of retaliation against an associate for reports made in good faith or with reasonable grounds to believe that the information reported is accurate, even if it later turns out to be inaccurate. Any associate who makes a report that is knowingly false or in bad faith may be subject to disciplinary action. The information you submit will be treated as confidential (as described above) and we encourage you to identify yourself (although you do not have to) so we may follow up with questions we may have.

## **THE DATA WE COLLECT**

We collect **Personal Data** to administer the BIL, and to investigate and remediate a Report as appropriate, including:

- Your name
- Contact information (phone number, email address)
- The name, title, and contact information of the Subject of a Report and other third parties mentioned in a Report
- A description of any questionable conduct, including all relevant details
- Any questions you may have
- The Personal Data from others during any subsequent investigations

Unless specifically requested, we ask that you not send us, and you not disclose, through the BIL or otherwise to us, any **Sensitive Personal Data**, as defined above, unless it is absolutely necessary for purposes of the Report.

### **LEGAL BASIS FOR THE COLLECTION OF PERSONAL DATA**

We may process Personal Data for any of the following reasons: 1) We have to comply with a legal obligation imposed on Marriott; 2) we have a legitimate interest to investigate the Report; or 3) individuals may have provided their consent.

### **USE AND PURPOSE OF COLLECTING YOUR PERSONAL DATA**

Personal Data will only be used administer the BIL, and to investigate and remediate a Report as appropriate.

### **HOW AND WHEN WE SHARE YOUR DATA**

We may share Personal Data with the following for the purposes of investigating, reporting, and administering the BIL, including:

- Marriott Group entities
- Franchisees
- Owners
- Service Providers, such as independent investigators and legal counsel

We also reserve the right to share Personal Data with third parties listed in the [Marriott Group Global Privacy Statement](#), for the following reasons, including, but not limited to: (a) complying with applicable law, including laws outside an individual's country of residence; (b) complying with legal process; (c) responding to requests from public and government authorities, including authorities outside an individual's country of residence or to meet national security or law enforcement requirements; and (d) protecting our operations, such as in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Marriott Group business, assets or stock (including any bankruptcy or similar proceedings); (e) protecting the rights, privacy, safety or property of the Marriott Group, you, or others; and (f) allowing us to pursue available remedies or limit the damages that we may sustain.

### **CROSS-BORDER TRANSFER**

Personal Data provided as part of the BIL Process is hosted and stored by Navex in the United States. Note that some countries that are not in the EU (European Union) or EEA (European Economic Area) are recognized by the European Commission as providing an adequate level of protection (the full list of these countries is available [here](#)). With regard to cross-border transfers to countries other than your country of residence, we have put in place adequate measures, such as the use of Standard Contractual Clauses adopted by the European Commission, including in our vendor agreements with Navex, to protect your Personal Data.

## INDIVIDUAL RIGHTS

If you would like to request to access, change, delete, restrict the use of, or object to the processing of Personal Data that has been provided as part of the BIL Process (to the extent that such rights are provided to you by law), please contact us at [privacy@marriott.com](mailto:privacy@marriott.com). Please see also the **Contact Us** section below.

For your protection, we only fulfill requests for the Personal Data associated with the name and email address that you identify in your request, and we may need to verify your identity before fulfilling certain requests. When permitted by law, we may charge an appropriate fee to cover the costs of responding to your request.

**Notice for California and Colorado Residents:** California and Colorado residents can find more information about exercising their rights under the CCPA, CPRA and CPA by reading our [California and Colorado Privacy Statement](#) or by calling 1-800-218-9316. Marriott does not sell Personal Data submitted as part of the BIL Process.

If you have given us consent in relation to Personal Data submitted as part of the BIL Process, you can withdraw your consent by contacting us as indicated in the **Contact Us** section below.

## SECURITY

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure.

Unless otherwise required by law, Personal Data will only be reviewed and used by those individuals who need to access the data to fulfill their job duties. These individuals may include Marriott human resources, audit, legal, security, or management personnel, as well as technical staff at Navex. Individuals involved in the handling of the Report and relevant investigation (if any) are required to follow special training on the BIL, are required to keep these matters confidential, and may only disclose Personal Data to others participating in the investigation on a need-to-know business basis. They may be located in the country in which you work, or the United States, or elsewhere.

If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the **Contact Us** section below.

## RECORD RETENTION AND DATA MINIMIZATION

Only Personal Data that is adequate, relevant, and necessary for the investigation will be processed and retained, as permitted by applicable law. We retain Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing investigation;
- Whether Marriott is subject to a legal obligation (for example, certain laws require us to keep records for a certain period of time before we can delete them); and
- Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation or regulatory investigations)

### **UPDATES TO THIS PRIVACY STATEMENT**

The “Last Updated” legend at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the BIL portal. If you would like to review the version of the Privacy Statement that was effective immediately prior to this revision, please contact us at [privacy@marriott.com](mailto:privacy@marriott.com).

### **CONTACT US**

If you have any questions about this Privacy Statement, please contact us at [privacy@marriott.com](mailto:privacy@marriott.com), or by mail:

Marriott International, Inc.  
Global Compliance, Privacy  
7750 Wisconsin Avenue  
Bethesda, MD 20814  
United States of America

You may also contact the Global Ethics & Compliance Office by email at [Business.Ethics@marriott.com](mailto:Business.Ethics@marriott.com).

In addition, you can:

Contact our data protection officer responsible for your country or region via [MarriottDPO@marriott.com](mailto:MarriottDPO@marriott.com). In your email, please indicate the country from which you are contacting us.

Lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection laws occurs at [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).