Privacy Statement

Read our updated Privacy Statement. We've changed the format to make it easier to read and provided more detail about what information we collect and why we collect it. Your privacy is extremely important to us so if you have any questions you can contact privacyoffice@ihg.com.

The privacy and security of your information is very important to us. Whether you are booking a room or are a member of one of our loyalty programs, we want you to trust that the information that you have provided to us is being properly managed and protected.

We have prepared this Privacy Statement to explain more about who we are and how we collect and manage your information.

Who we are

This Privacy Statement is issued by the InterContinental Hotels Group of Companies (collectively referred to as "IHG", "we", "us" or "our" in this Privacy Statement), which includes the direct and indirect subsidiaries of InterContinental Hotels Group PLC and covers information collected and used by us in the course of our business. Your information may also be collected and used by IHG-branded hotels. In most cases these hotels are independently owned and their use of your information is only covered in this Privacy Statement where specifically noted.

If you would like to learn more about IHG and our relationship with our IHG-branded hotels, click below.

About IHG

We are a global hospitality company with IHG-branded hotels in nearly 100 countries. We predominantly franchise our brands to, and manage hotels on behalf of, independent third party owners. We also operate a number of programs that are related to our hotel business such as IHG Rewards Club, which is our core loyalty program.

About our IHG-branded hotels

We franchise our brands to, and manage hotels on behalf of, third party owners. Most hotels operating under IHG's brands are independently owned and operated by parties that have entered into a franchise agreement with IHG that allows them to use an IHG brand for the purposes of operating a hotel (referred to as "Franchisees" or "Franchised Hotels"). If you make a reservation through us to stay at an IHG-branded hotel, we will share your information with that hotel. However, as IHG-branded hotels are not owned or controlled by IHG, their use of your information will be governed by their own privacy practices and is only covered in this Privacy Statement where specifically noted.

Information we collect and how we use and share it

We collect and use personal information if you make a booking through our reservation system, stay at an IHG-branded hotel or participate in one of our loyalty programmes such as IHG Rewards Club. To learn more, please click the relevant section below.

If you make a reservation or stay at an IHG-branded hotel

Information we collect: We collect information from you when you make a booking through our reservation system or stay at an IHG-branded hotel. Information collected during the course of the reservation and during your stay may include:

- Your name, email address, home and business address, phone number, nationality and payment card information;
- Information relating to your membership in one of our services or programs or those of our program partners such as your IHG Rewards Club number or frequent flier number; and
- Information such as stay and room preferences made during the course of your reservation such as your preferred room type and specific requests to the hotel.

This information may be provided to us directly when you make a reservation through one of our global reservation offices, through our websites, directly at the hotel or through our mobile applications. In some cases we may receive this information from a third party, such as when you book through an online travel agency or if information is provided directly to one of our Franchisees.

How we use this information: We use the information collected from you primarily to fulfil your hotel reservation. Prior to your stay this may include sending your information to the hotel or sending you pre-stay communications. Following your stay, we may also send you post-stay communications and satisfaction surveys to get feedback on your experience.

In some instances where we have your consent or where permitted under applicable law, we may send you marketing communications (which may include text messages or calls placed using autodialer technology) for products and services that we believe would be relevant for you. We also may use information related to your stay to display targeted advertisements on our websites or on third party websites or to send you more relevant messaging. Additionally, we use this information for purposes of aggregated trend and statistical analysis to evaluate and improve our products and services, plan new hotel locations and services and other market research.

Who we share your information with: We will share your information with the hotel you are staying at to fulfil your reservation. We may also share your information with third party service providers to provide services in relation to our business as well as to help us improve our products and services. For example, we might use a third party or a third party product for the purposes of market research and data analytics. In certain instances, subject to local consent requirements, third party service providers may also assist us with various marketing campaigns. We may also share your information with third parties, including our IHG Rewards Club partners and other third parties, to extend special offers about their own products and services to you. These parties have agreed to comply with our privacy requirements.

Aside from the purposes described above, we do not share your stay information with any other third parties unless we have your consent or under special circumstances, such as:

- when we believe in good faith that the disclosure is required by law or to protect the safety of hotel guests, employees, the public or IHG property;
- when disclosure is required to comply with a judicial proceeding, court order, subpoena, warrant or legal process; or
- in the event of a merger, asset sale, or other related transaction.

If you join one of our loyalty programs

Information we collect: We collect information from you during the course of your membership in any of our loyalty programs and services, including our core loyalty program, IHG Rewards Club. Information collected during the course of your enrolment and participation in these programs may include:

- Your name, email address, home and business address, phone number, nationality, birthday and payment card information;
- Your membership number and pin as well as details of your memberships with any of our program partners such as our airline or car rental partners;
- Information that you may choose to provide in your loyalty profile, such as your personal stay and destination preferences; and
- Marketing preferences, including how you prefer to be contacted by IHG as well as what types of information you are interested in hearing about.

This information may be provided to us directly through our global reservation and customer care offices, through our websites, via social media, directly at the hotel or through our mobile applications. In some cases we may receive this information from a third party, such as one of our Franchisees. We may also collect information from other sources, such as publicly available information, to help identify what types of marketing information you may be interested in hearing about.

How we use this information: We use your information to operate and provide services in connection with our loyalty programs. We also use your information to improve our products and services.

This may include:

- Enrolment in the loyalty program;
- The order and delivery of merchandise that you have redeemed online;
- Sending you updates, account statements and other information relating to your participation in one of our programs or services;
- Sending you marketing communications (which may include text messages or calls placed using autodialer technology) in relation to the products and services offered by IHG or its third party partners or affiliates;
- Providing you with personalized advertisements or communications for IHG products or services that we believe may be relevant for you; and
- Analytics, statistical analysis and other research.

Although provision of much of the information requested is voluntary, the failure to provide certain information may impact and/or prevent our ability to offer you certain services. Additional details on how you can manage your information and how we communicate with you can be found in the "Managing your preferences and information" section below.

Who we share your information with: During the course of your participation in our loyalty programs, it may be necessary to

share your information with third parties such as our third party partners and service providers for the purposes of operating the program and to provide you with the products and services that you have requested. We may also share your information with third parties, including our IHG Rewards Club partners and other third parties, to extend special offers about their own products and services to you. These parties have agreed to comply with our privacy requirements. We also use third party service providers to assist us with managing, carrying out and improving our advertising.

Aside from the purposes described above, we do not share your information with any other third parties unless we have your consent or under special circumstances, such as:

- when we believe in good faith that the disclosure is required by law or to protect the safety of hotel guests, employees, the public or IHG property;
- when disclosure is required to comply with a judicial proceeding, court order, subpoena, warrant or legal process; or
- in the event of a merger, asset sale, or other related transaction.

There may be other times when we collect and use personal information, for example if you choose to participate in one of our competitions or sweepstakes, sign up to receive our newsletters or other special offers and promotions, download one of our mobile applications or participate in one of our other services. In these instances, we will collect information from you for running and administering the respective competition, sweepstakes or service that you have elected to participate in. The information collected may include personal details such as your name and address as well as certain demographic information. In each case, we will collect, use and secure your information in a manner consistent with the general principles set out in this Privacy Statement unless we tell you otherwise.

We may also collect information from you when you browse our website, use our mobile applications or participate in certain services at an IHG-branded hotel, such as wireless internet services. In these instances, information such as your country information, internet protocol ("IP") address, media access control address and other characteristics about your system or device may be automatically collected. This information may be collected for functional purposes as well as to improve your experience when using these services. This information may also be used for aggregated trend and statistical analysis, and for showing you more relevant advertisements and messages. More information on these practices can be found in the "Using our websites, mobile applications and other technology" section below.

Data transfer

As we operate via a global network of corporate offices, reservation and service centres, data centres and hotels, it may be necessary to transfer your information to a country outside of the country where it was originally collected or outside of your country of residence or nationality. The information that you provide us during the course of a reservation or through the provision of any other services may be transferred to any of our IHG-owned or affiliated entities and hotels around the world for the purposes of carrying out or facilitating these services. It will also be necessary to transfer this information to third parties, including, without limitation, our Franchisees, partners and third party service providers.

Using our websites, mobile applications and other technology

We and our third party service providers use cookies, pixels, web beacons and other similar technologies on our websites, mobile applications and in other areas of our business to collect information and provide you with the services that you have requested or participate in and to provide targeted advertising. We also use the information that we collect to improve our products and services as well as your experience when visiting our websites and using our mobile applications. For more information on these subjects, please click the relevant section below.

Cookies and other tracking technologies

What is a cookie: A "cookie" is a small text file that is placed onto an Internet user's web browser or device and is used to remember as well as obtain information about that party. You might be assigned a cookie when visiting our websites or when using our mobile applications. In some instances, where permitted under the applicable law, cookies may also be used for the purposes of certain email campaigns.

What types of cookies we use and how we use them: We use three primary types of cookies, which include:

- <u>Functional Cookies</u> these cookies support the use of the website and applications and enable certain features to enhance your experience. For example, we use functional cookies to facilitate your reservation and to remember your selections as you move from page to page. We also use functional cookies for remembering things like your sign-in information and hotel preferences to avoid you having to re-enter it.
- <u>Performance Cookies</u> these cookies collect information needed to support the website and our applications and allow us to improve our website and identify any problems that you faced while visiting us. For example,

- performance cookies may provide us with information about how you came to our website and how you navigated around our website during your visit. We also use these cookies to provide us with certain statistical and analytics information, such as how many visitors came to our website or how effective our advertising is.
- <u>Targeting Cookies</u> these cookies are used to collect information from you to help us to improve our products and services as well as serve you with targeted advertisements that we believe will be relevant for you. We use targeting cookies across our websites and applications for various marketing initiatives and campaigns. For more information, please see the "Targeted advertising" section below.

To learn more about cookies and how they are used, please visit: http://www.allaboutcookies.org/.

<u>Third party cookies</u>: As described above, we use a number of third party service providers to help us manage, carry out and improve our advertising. These parties may set cookies at our direction to help us collect information and provide you with advertisements that we believe would be relevant for you. In some instances these third parties may also assist us by providing certain statistical and analytics information in relation to our marketing practices. We also may share information collected through cookies (and other tracking technologies) with third parties to use for their own analytics and marketing purposes.

Managing cookies and opting out: You can choose to visit our web sites without cookies, but in some cases certain services, features and functionality may not be available. To visit without cookies, you can configure your browser to reject all cookies or notify you when a cookie is set. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. To manage Flash cookies, please click here. In relation to third party cookies, we participate in the Self-Regulatory Program for Online Behavioural Advertising managed by the Digital Advertising Alliance ("DAA"). As part of this commitment, IHG has agreed to comply with the standards and guidelines promulgated by the DAA. For more information regarding targeted advertisements and/or to opt out of automatic collection for these purposes, please visit http://www.aboutads.info/choices/ or http://www.networkadvertising.org/managing/opt_out.asp. Within the EU the EUDAA operates a similar "ad choices" scheme, http://www.youronlinechoices.com/uk/.

Other technologies: Other technologies such as pixels and web beacons may also be used on our websites, mobile applications, in email messages and in other areas of our business. These technologies are used to improve our products and services as well as our marketing efforts.

<u>Targeted advertising</u>: We and our third party service providers may serve targeted advertisements through the use of first or third party cookies, pixels and web beacons when you visit our website or use our mobile applications. In some instances, these cookies may be persistent cookies. We do this to provide you with advertising that we believe may be relevant for you as well as improve our own products and services, including the functionality and performance of our websites and mobile applications. To learn more about opting out of certain types of targeted advertising, please see the "Managing cookies and opting out" section above.

<u>Do-Not-Track</u>: Currently, our systems do not recognize browser "do-not-track" signals. You may, however, disable certain tracking as discussed in this section (e.g., by disabling cookies); you also may opt-out of targeted advertising by following the instructions at the <u>DAA</u> and the <u>Network Advertising Initiative</u> websites.

Location Information and Services

We may receive information about your location during the course of and for the purpose of providing you the services described above through your use of our websites and mobile applications. For example, if you are using our mobile applications and have consented to sharing your location information with us, this information might be collected through GPS or Bluetooth technologies to enable us to provide certain services to you such as customized offers and promotions. In addition to your use of our websites and mobile applications, we may also receive location information from wireless networks or cellular towers in proximity to your mobile device, through your internet protocol ("IP") address or through your use of other services we provide at our hotels, such as wireless internet services. We may also have access to location information that you provide to us through your use of social media, such as when you "tweet" your location. Your location preferences can be set or modified at the device level or through modifying your settings with the relevant social media platform.

Mobile Applications

We receive information about you when you use our mobile applications. Some information such as your device manufacturer and type are collected automatically, while other information is only collected if you choose to provide it, such as your location information. Where we process and use your personal information in connection with any mobile applications, we will do this in line with the general principles outlined in this Statement unless we tell you otherwise.

If you use our mobile app, we also send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you may turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

Social Media

We may use various social media features such as the Facebook "Like" button on our websites and mobile applications. Certain information may be shared or otherwise provided to us through your use of these features in conjunction with our services and programs. Subject to your account and privacy settings, we may also be able to see information that you post when using these social media platforms whether or not you are using one of our services. In some instances, depending on the circumstances, we may contact you on these social media platforms. The information you post on social media sites as well as the controls surrounding these disclosures are governed by the respective policies of these third parties.

How we secure your information

We are committed to protecting the confidentiality and security of the information that you provide to us. To do this, technical, physical and organizational security measures are put in place to protect against any unauthorized access, disclosure, damage or loss of your information. The collection, transmission and storage of information can never be guaranteed to be completely secure, however, we take steps to ensure that appropriate security safeguards are in place to protect your information.

Managing your preferences and information

We want to ensure that you have the necessary tools at your disposal to control the information that you provide to us, including how we communicate with you. It is also important that you contact us to update your information if any of it is inaccurate or changes. Please click the relevant section below to learn more about how to control how we communicate with you and how to update, modify and delete your information.

Managing your communication preferences

Through the provision of the services described above, we and in some instances our Franchisees, third party partners and service providers, may communicate with you in relation to a reservation, as a member of any of our loyalty programs or to support any other services that we provide.

In some instances, especially if you are a member of IHG Rewards Club or an InterContinental Ambassador, you can go to your account, sign in and click on the "Communication Preferences" section to revise your communication preferences. IHG Reward Club members can also contact any of our IHG Rewards Club Service Centers. Additionally, the option to unsubscribe from marketing communications will be included within the communication itself. In all other cases, or if you are having difficulties with unsubscribing from any particular communication, please contact one of our global customer care offices or the IHG Privacy Office (details found in the "How to contact us section"). Please be aware that unsubscribing from one type of communication may not unsubscribe you from another type. Likewise, unsubscribing from our communications may not mean that you are unsubscribed from certain communications carried out independently by our Franchisees.

Managing your information

In the event any information that you provide to us is inaccurate, changes or you would like this information deleted, your information can be updated by contacting one of our global customer care offices. In some instances, especially if you are an IHG Rewards Club or InterContinental Ambassador member, you can update certain aspects of your personal information by going to your account, signing in and clicking on the "Personal Information" section to update and amend your personal information. For all other cases, please contact the IHG Privacy Office (details found in the "How to contact us section"). We will respond to your request within a reasonable timeframe. Please note that in some instances it may not be possible to delete certain pieces of your information and a portion of the information may be needed for suppression purposes. In other instances, we may not have the ability to delete certain pieces of information that are stored on our systems or that have been provided to third parties in connection with the services discussed in this Privacy Statement.

Special information for California consumers

California residents may request a list of certain third parties to which we have disclosed personally identifiable information about you for their own direct marketing purposes. You may make one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for your response. You may request this information in writing by contacting us through one of the methods listed under the "How to contact us" section. Please allow up to thirty (30) days for a response.

Links to other sites

Our websites and applications may contain links to websites that are maintained and/or controlled by third parties. In some instances these websites may be co-branded and display our logos or other trademarks. You can always tell whether you are on one of our websites by checking the uniform record locator ("URL") on the page that you are visiting. We encourage you to review the privacy policies of these third party websites as their privacy practices may differ from ours.

Children

Our websites are not intended for children and we do not intentionally solicit or collect personal information from individuals under the age of 18. If we are notified or otherwise discover that a minor's personal information has been improperly collected, we will take all commercially reasonable steps to delete that information. In limited instances, we may have a campaign or program targeted towards children. In these instances details on the information practices will be presented within the terms and conditions of the program or campaign.

How to contact us

For any questions or concerns regarding this Privacy Statement or our data privacy practices, please contact us:

• By email: privacyoffice@ihg.com

By post:

InterContinental Hotels Group

Attn: Privacy Office Three Ravinia Drive Atlanta, Georgia 30346 By phone: 1-770-604-8347 By fax: 1-770-604-5275

To the extent permitted under the local law, you may also use the above contact details to request access to any of your personal information that is held by IHG. These requests will be reviewed and processed in line with the local law.

Safe Harbor

Six Continent Hotels, Inc., one of our US affiliates, complies with the U.S.- E.U. Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of certain personal information obtained from European Union member countries and Switzerland. To learn more about the Safe Harbor program, and to view the certification, please visit http://www.export.gov/safeharbor/. Please e-mail any comments or questions regarding our Safe Harbor compliance to privacyoffice@ihg.com.

TRUSTe Certification and Seal

We are a participant in the TRUSTe Privacy Seal Program and have had this Privacy Statement and our information practices reviewed to ensure that we comply with TRUSTe's Program requirements. The TRUSTe certification applies to the privacy practices governed by the Privacy Statement accessible from this digital property. In order to view our relationship with TRUSTe please visit the validation page visible by clicking on the TRUSTe seal. If you have any complaints or concerns that are not adequately addressed through the channels set out in this Statement, you can contact TRUSTe by clicking here.

Changes to this Privacy Statement

In some instances, we may have to change, modify or amend this Privacy Statement in order to comply with the evolving regulatory environment or the needs of our business. Subject to any applicable legal requirements to provide additional notice, any changes to this Privacy Statement will be communicated through our websites and mobile applications. However, if there will be changes made to the use of your personal information in a manner different from that stated at the time of collection we will notify you by posting a notice on our website for 30 days prior to the changes taking effect.

Effective Date: April 2016