

Your California Privacy Rights

1. **Shine the Light Law:** If you are a resident of California, California Civil Code Section 1798.83 allows you to request information regarding the Personal Information we collected and third parties to whom we disclosed your Personal Information for the third parties' direct marketing purposes during the preceding calendar year. To send this request, you may contact us using one of the methods in the “How Can You Contact Us?” section of this Privacy Notice.
2. **California Consumer Privacy Act (“CCPA”):** This section 2 is intended to satisfy the requirements of the California Consumer Privacy Act (“CCPA”). The rights of the CCPA are in addition to any other rights applicable to you in this Privacy Notice.

a) **Personal Information Definition:**

For the CCPA, “Personal Information” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

b) **Exclusions:**

Some Personal Information is not subject to the CCPA such as consumer credit reports and background checks, publicly available data lawfully made available from state or federal government records, and any other Personal Information exempt from the CCPA. This CCCPA section does not apply to Our employees. A separate privacy notice applies to Our employees.

c) **The Categories of Personal Information We Collect and Why We Collect Them.**

Generally, where applicable, we may collect the following categories of Personal Information (as set forth in the CCPA) about you for the following purposes:

Personal Information Category	Identifiers: Identifiers such as your real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, account number, rewards program number, and other similar identifiers.
Purposes of Collection	<p>We may collect this information to establish a business record of you, setup rewards and other accounts, create login credentials for you, and for similar reasons.</p> <p>We may collect this information to communicate to you about your purchases, transactions, contracts, our business relationship we you, and for similar reasons.</p> <p>We may collect this information to provide you with surveys for quality assurance, product development and more.</p> <p>We may collect this information to facilitate</p>

	<p>communications to you regarding products/services that may be of interest to you.</p> <p>We may collect this information to provide a list to resorts, Home Owner’s Associations (HOAs), and third party partners related to your transactions, election activities, ownership and more.</p> <p>We may collect this information to verify your identity such as when you request access to your Personal Information or apply for a loan.</p> <p>We may collect this information such as government id related information in order to process your loan application or provide information to a travel provider such as an airline pertaining to your reservation.</p> <p>We may collect this information to provide a list of your emergency contacts.</p> <p>We may collect this information to meet a legal requirement such as recording a title or similar functions.</p> <p>We may collect your signature on documents like contracts, loan terms, waivers, etc.</p>
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<p>Personal Information Category</p>	<p>Commercial Information: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>
<p>Purposes of Collection</p>	<p>We may collect this information to process and/or administer your loan applications and loans, your contracts, your reservations, your loyalty and/or rewards accounts, and more.</p> <p>We may collect this information to personalize your services/products, provide helpful suggestions, respond to your commercial inquiries, and facilitate communications to you of products/services and related features that may be of interest to you.</p> <p>We may collect this information to create efficiencies in managing reservations and recurring commercial interactions with you or otherwise managing our ongoing business relationship.</p> <p>We may collect this information to maintain a record of your consuming history preferences and tendencies to better serve you, to personalize an</p>

	<p>experience for you, and to meet other needs of offering, providing and maintaining an ongoing service relationship with you.</p> <p>We may collect your survey answers about events, products/services and more for quality assurance, product improvement, and to facilitate marketing that may be of interest to you.</p>
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Personal Information Category	Protected Classifications: characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.
Purposes of Collection	<p>We may collect this information where needed for a legal or financial document such as when we collect your marital status for a loan application.</p> <p>We may collect this information where needed for a reservation, such as where we may need your gender to report to the airlines. We may also collect this information like gender to address you with the proper salutation.</p> <p>We may collect this information to provide you with the proper accommodations or assistance such as when you notify of us health related accommodations you require related to a reservation.</p> <p>We may collect additional information in this category as appropriate.</p>

Personal Information Category	Biometric Information: physiological, biological or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including DNA, imagery of the iris, retina, fingerprint, faceprint, hand, palm, vein patterns, and voice recordings, keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.
Purposes of Collection	We may collect biometric information in order for you to access portions of a resort or property or to assist in a law enforcement investigation.

Personal Information Category	Internet Activity: Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and
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	information regarding a resident's interaction with an internet website, application, or advertisement, as well as physical and network access logs and other network activity information related to your use of any company device, network or other information resource.
Purposes of Collection	We may collect this information to improve our website functionality, improve transaction throughput, and personalize your experience. We may collect this information to determine what interests you to facilitate targeted communications of products and services to you. We may collect this information to judge the effectiveness of any online marketing campaigns.

Personal Information Category	Geolocation Data: Precise geographic location information about a particular individual or device.
Purposes of Collection	We may collect your postal address, the location associated with the device used of your internet activity in order to create demographic analysis of visits to our site and promote interests in our products to better market to and understand our customers. We may collect this information because of differences in jurisdictional laws to be sure we are compliant in our presentation of content.

Personal Information Category	Audio/Visual Data: audio, electronic, visual, thermal, olfactory, or similar information such as, CCTV images and photographs, and audio recordings (e.g., recorded meetings).
Purposes of Collection	We may collect this information for quality assurance of product/service presentations or communications, when you pose for videos/photos or provide audios at our resorts or to us in any manner in order to improve our products and services, when you participate in activities or excursions or attend other events as part of service delivery. We may collect this information in public areas of our facilities and online to provide safe and secure facilities and to ensure quality assurance.

Personal Information Category	Employment History: professional or employment-related information.
Purposes of Collection	We may collect details of your employment history such as job title and length of time at your employment to process a loan application. We may collect employment history as part of a larger analysis of you and what products/services would be well suited for you. We may collect details of your employment history as part of your credentials if you run for an elected position within the association of your vacation ownership property.

Personal Information Category	Education Information: information about education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).
Purposes of Collection	For example, we may collect this information in order to process a loan, in order to match your potential interest and likelihood of purchasing certain products/services, and as part of any office election you may run for as a candidate related to an HOA.

Personal Information Category	Profiles and Inferences: inferences drawn from any of the information identified above to create a profile about a resident reflecting the resident's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Purposes of Collection	For example, we may infer what products or services may interest you, your predicted attachment to your purchased products, your likelihood of purchasing other products, your likelihood of exacting contract and loan terms, and more. We may demographic information about you such as your age, income, etc.

OTHER PURPOSES FOR COLLECTING AND USING YOUR PERSONAL INFORMATION: Generally, we may use all of the above categories of personal information for the following purposes where applicable:

- **Security and Monitoring.** In order to monitor and secure our resources, network, premises and assets, including:
 - Monitoring for, preventing investigating, and responding to security and privacy incidents
 - Providing and managing access to physical and technical access controls

- Monitoring activities, access and use to ensure the security and functioning of our systems and assets
 - Securing our offices, premises and physical assets, including through the use of electronic access systems and video monitoring
 - **Auditing, reporting corporate governance, and internal operations.** We process Personal Information for the purposes of performing audits of our business operations, performing security reviews, ensuring we are meeting legal obligations, managing your business record, and other auditing functions.
 - **M&A and Other Business Transactions.** For purposes of planning, due diligence and implementation of commercial transactions, for example mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions.
 - **Defending and Protecting Rights.** In order to protect and defend our rights and interests and those of third parties, including to manage and respond to employee and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.
 - **Compliance with Applicable Legal Obligations.** Relating to compliance with applicable legal obligations (such as responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations.
- d) **WHERE DO WE GET YOUR PERSONAL INFORMATION?:** We may collect all of the Personal Information categories above primarily from you such as when you fill out a form, contact us, submit documents to us, use our websites or mobile apps, apply for a loan, and interact with us in other ways. We may collect it from our Affiliates, third party partners or data management companies. We may collect it from social media accounts such as when you connect to our websites through such an account. We may collect it from travel agents who provide it to us on your behalf or other persons who provide your information.
- e) **TO WHOM DO WE DISCLOSE YOUR PERSONAL INFORMATION?:** We disclose Personal Information to Affiliates, vendors and service providers, legal and regulatory agencies under certain circumstances, third party product and service providers, third party partners, and others under certain circumstances. Please see the “**When We Disclose Your Information**” section for more.
- f) **WE DO NOT SELL YOUR PERSONAL INFORMATION:** We do not sell your Personal Information to third parties for consideration or compensation.
- g) **California Rights:**
- **Right to Know:** You have a right to know what Personal Information Categories we have collected, used, disclosed or sold about you in the previous 12 months and the purposes of such actions. You have a right to know the sources of collection of such information and to whom we have disclosed it to for business purposes or a sale. You also have a right receive a list of the Personal Information we have collected about you in the last 12 months from the date of your request. You may request any or all of this information up to two times in a 12 month period. You may exercise this right by filling out and submitting a Privacy Rights Request Form where one is available (See ‘California Privacy Rights Request Form Link’ below) or by contacting Us using one of the methods listed in the “How Can You Contact Us?” section of this Privacy Notice.

- **Right to Delete:** You have a right to instruct Us to delete certain Personal Information we hold about you. We will assess your request and determine, under the CCPA, what Personal Information we are required to delete. If we retain any Personal Information, we will notify you of what we have retained and why. For information we delete, we will notify you of the method of deletion. You may exercise this right by filling out and submitting a Privacy Rights Request Form where one is available (See ‘California Privacy Rights Request Form Link’ below) or by contacting Us using one of the methods listed in the “How Can You Contact Us?” section of this Privacy Notice.
- **Nondiscrimination:** You shall not incur or be subject to any price or quality of service difference from Us for exercising any of your rights under the CCPA. If you feel you have been treated unfairly for exercising any of your rights under the CCPA, please contact us immediately using one of the methods listed in the “How Can You Contact Us?” section of this Privacy Notice.
- **Verification:** We will require certain information from you to verify your identity as the requestor. Generally, we will ask you information that we have already collected about you to provide this verification. For instance, if you submit a “Right to Know” request, we may ask your name, address, email address, account number if applicable, and phone number. We reserve the right to ask additional questions and/or to contact you directly if in our discretion we determine we need additional verification.
- **Agents:** You may have an agent exercise your rights on your behalf. If an agent provides a Power of Attorney in compliance with California Probate Code Sections 4000-4464, We will process such request. If however, your agent does not provide such Power of Attorney, we will need you to provide written permission to Us of the agent’s right to exercise your rights in this section on your behalf. Please include your full name, the address and email associated with your account with Us, your member number if applicable, the agent’s full name and address, and the agent’s email. Please send this permission to privacy@wyn.com. Furthermore, in addition to your written permission, we may contact you and/or your agent for further verification of your request.