

## **Oakwood Privacy Policy**

Last Updated: January 1, 2020

### **INTRODUCTION**

This Privacy Policy applies to Oakwood Worldwide (US) LP, its affiliates, subsidiaries, services providers, mobile applications and website, including [www.oakwood.com](http://www.oakwood.com) (collectively, "Oakwood", "we" or "us"). At Oakwood, we are committed to protecting the privacy and security of your personal information. We have developed this Privacy Policy to explain our practices regarding the personal information we collect from you or about you on this site, via our apps, or through written or verbal communication with us when you visit one of our properties, or from other sources. While this Privacy Policy broadly describes the practices that we have adopted globally, local laws vary and some jurisdictions may place restrictions on our processing activities. Therefore, our actual practices in such jurisdictions may be more limited than those described herein in order to enable us to comply with local requirements.

PLEASE READ THIS PRIVACY POLICY CAREFULLY TO UNDERSTAND OUR POLICIES AND PRACTICES REGARDING YOUR INFORMATION AND HOW WE WILL TREAT IT. BY USING ANY OF OUR PRODUCTS OR SERVICES YOU UNDERSTAND AND ACKNOWLEDGE THAT WE WILL COLLECT AND USE YOUR PERSONAL INFORMATION AS DESCRIBED BELOW AND AGREE TO THIS PRIVACY POLICY.

This policy may change from time to time. Your continued use of our products or services after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

### **PERSONAL INFORMATION WE COLLECT**

Oakwood collects personal information at every touch point or guest interaction. This personal information may include: your name, mailing address, work address, place of employment, billing address, email address, phone number, information related to your reservation, stay or visit to a property; participation in a membership or loyalty program; participation in a contest, sweepstakes, or marketing program; personal characteristics, gender, passport number, social security number (in limited circumstances); payment information, such as your payment card number and other card information, as well as authentication information and other billing and account details associated with billing; guest preferences; marketing and communication preferences; information about vehicles you may bring to our properties; reviews and opinions about our properties or service providers; and other types of information that you choose to provide to us or that we may obtain about you.

We may also collect information related to conversations, including recording or monitoring customer service calls for quality assurance and training purposes, and other communications, such as through email, in-app messages and SMS.

When we collect information from you, we will ask you, your employer, your relocation company or travel agency to voluntarily supply us with the information we need. We endeavor to collect information only with your knowledge and with your permission if necessary.

In addition, we collect other personal information in certain cases, such as:

- **Customer Surveys:** We may request personal information and demographic data in customer surveys.
- **On-property Collection:** We may collect additional personal information during registration/check-in at our properties, including such information as may be required by local laws. We may also use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas, as well as information related to your location while on our properties (via keycards and other technologies). We may also use closed-circuit television and other technologies that record sound or video for the protection of our staff, guests and visitors to our properties where permitted by law. In addition, we may collect personal information in connection with on-property services, such as concierge services.
- **Employment Applications:** If you submit your personal information at our Careers – Current Openings page at <https://www.oakwood.com/careers> or any pages produced by your search, you are visiting a co-branded page powered by Newton Software. Your resume and any other personal information submitted are provided directly to Oakwood’s Human Resources Department and may be shared with Oakwood hiring managers.
- **WiFi Service:** When you use WiFi service at our properties, the personal data you provide for access and authentication may be collected and used by us and third parties such as authentication gateway partners and WiFi service providers to facilitate your use of the WiFi service.
- **Cookies:** Oakwood uses cookies and pixel tags (Web beacons) to obtain information while visiting our websites. Please view our cookie policy at <https://www.oakwood.com/cookie-policy>.

In addition to the information you provide to us, we may also infer information about you based on the information you provide to us or from Other Information we collect.

#### **USE OF PERSONAL INFORMATION COLLECTED ABOUT YOU**

We use your personal information in a number of ways, including to provide and personalize the services you request and expect from Oakwood, conduct direct marketing and sales promotions, and as set forth below in more detail. We will collect your consent prior to processing your data where required by applicable law.

We collect certain data, including your name, address, payment information, and, in certain countries, travel document information, in order to process your reservation. Failure to provide this information may result in our inability to process your reservation.

- **Marketing Communications:** Where permitted we may use your personal information to provide or offer you newsletters, promotions, and featured specials, as well as other marketing messages in accordance with any communication preferences you have expressed.

#### **PERSONAL INFORMATION WE SHARE**

In order to offer you the expected level of hospitality and to provide you with the best level of service, we may share your personal information among Oakwood's affiliates, subsidiaries, services providers, properties that we manage but do not own, owners and operators of Oakwood or Execustay properties, and third parties as described below:

- When we communicate with employers, relocation companies, travel agencies, companies or organizations who have made reservations, agreed to make payments, arranged for discounts, or purchased services on your behalf or if you use our services under a corporate or other commercial account.
- If you seek to have your rental charges invoiced to your employer or any other third party, we may disclose your personal information to that employer or third party and to any companies that assist the third party in processing invoices.
- When we report to credit card issuers, credit reporting, fraud checking agencies and debt collection agencies, but only to the extent necessary to comply with contractual agreements.
- If you choose to business with us through, or with assistance of, your employer's or any third party's travel agent, relocation company or other intermediary, we may disclose personally information about you to the employer or other intermediary to make, modify or cancel a reservation made by or with assistance of the agent, to respond to questions or comments made by the agent on your behalf, to facilitate any other task that the employer or intermediary advises us that you intend for the agent to fulfill, or that such agent would, as a matter of industry practice, typically fulfill.
- We rely on third parties to provide services and products on our behalf and may share your personal information with them as appropriate. Generally, our service providers are contractually obligated to protect your personal information and may not otherwise use or share your personal information, except as may be required by law. However, our fraud detection service providers may use, but not share, your personal information for fraud detection purposes. We may use service providers to communicate news and deliver promotional transactional materials to you on our behalf, including personalized online and mobile advertising in accordance with your preferences and applicable law.

If you share personal information with us as described above, we will limit the scope of such information that is furnished solely to the amount necessary for the performance of the specific function. We may confirm personal information you provide us on applications and forms, or as a resident of one of our communities, with third parties, such as your bank, employer, present mortgage company or landlord, utility providers, government entities, resident screening agencies, credit agencies, and other businesses where you have an account or credit card. Unless otherwise precluded by legal process, we require third parties to protect your personally identifiable information in a similar manner as set forth in this Privacy Policy, and abide by applicable laws and regulations.

#### **OTHER INFORMATION**

When you visit and interact with Oakwood websites and apps, we collect other information that does not directly identify you about your use of the site, such as a catalog of the site pages you visit, and the number of visits to our sites (“Other Information”). We use Other Information to improve your experience online.

We use cookies and other technologies (such as “pixel tags” and “web beacons”) to collect information. If you want to remove or block Cookies from your device at any time, you can update your browser settings (consult your browser’s “help” menu to learn how to remove or block Cookies.) Oakwood is not responsible for your browser settings.

We may use information we have collected and aggregated or anonymized personal information received from third parties, to understand more about our users. This includes demographic data, such as date of birth, gender and marital status, inferred commercial interests, and other information we may collect from you or from third parties.

Because Other Information does not personally identify you, such information may be disclosed for any purpose where permitted by law. In some instances, we may combine Other Information with personal information. If we do combine any Other Information with personal information, the combined information will be treated by us as personal information in accordance with this Statement.

#### **SENSITIVE INFORMATION**

The term “sensitive information” refers to information related to your racial or ethnic origin, political opinion, religious philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the purpose of unique identification. In some jurisdictions, mobile phone numbers, location data, and information contained on identity documents also are considered sensitive information.

We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. We may use health data provided by you to serve you better and meet your particular needs (for example, the provision of disability access).

#### **PERSONAL INFORMATION FROM CHILDREN**

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not allow your children to submit personal information without your permission.

Our website and mobile application are not intended for children under 18 years of age. No one under age 18 may provide any personal information to or on our website or application. If you are under 10, do not use or provide any information to us, including your name, address, telephone number, or email address. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete the information. If you believe we might have any information from or about a child under 18, please contact us at [privacy@oakwood.com](mailto:privacy@oakwood.com).

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see Your California Privacy Rights for more information.

#### **MOBILE SERVICES**

We provide mobile apps that can be downloaded to your smartphone or mobile device. These apps have a variety of functionalities that enhance the customer experience. In addition to providing services, our apps may collect personal and Other Information that will be used in accordance with this Policy.

### **LINKS TO THIRD-PARTY WEBSITES AND SERVICES**

Our site and our mobile applications may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

Oakwood may partner with a limited number of Internet providers to offer Internet access to our guests. Your use of on-property Internet services is subject to the third-party Internet provider's terms of use and privacy policy. You can access those terms and policies by visiting the Internet provider's website.

### **CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION**

We strive to provide you with choices regarding the personal information you provide to us. We have create mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of our website may then be inaccessible or not function properly.
- **Promotional Offers from the Company.** If you do not wish to have your contact information used by Oakwood to promote our own products or services, you can opt-out by following the directions on a marketing e-mail or direct mail communication from us, or send an email with your current contact information to [oakwoodmarketing@oakwood.com](mailto:oakwoodmarketing@oakwood.com).

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collection or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's [website](#).

California residents may have additional personal information rights and choices. Please see below for Your California Privacy Rights for more information.

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 630A may submit a request to [privacy@oakwood.com](mailto:privacy@oakwood.com). However, please know we do not currently sell data triggering that statute's opt-out requirements.

### **ACCESSING AND CORRECTING YOUR INFORMATION**

You can review and change your personal information by sending an email with your current contact information as well as your request to [privacy@oakwood.com](mailto:privacy@oakwood.com). Whenever you submit a request to

update your information in any way, we will honor your request within 4 weeks and will inform you of the status.

California residents may have additional personal information rights and choices. Please see below for more information.

#### **DATA SECURITY**

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website or through our app. Any transmission of personal information is at your own risk.

#### **POLICY CHANGES**

We may modify this Policy from time to time. When we make changes to this Policy we will post a link to the revised Policy on the homepage of our site. You can tell when this Policy was last updated by looking at the date at the top of the Policy. Any changes to our Policy will become effective upon posting of the revised Policy on the site. Use of the site, any of our products and services, and/or providing consent to the updated Policy following such changes constitutes your acceptance of the revised Policy then in effect.

#### **CONTACT INFORMATION**

If you have questions or comments about this notice, the ways in which Oakwood collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at [privacy@oakwood.com](mailto:privacy@oakwood.com)

### **ANNEX**

#### **PRIVACY NOTICE FOR CALIFORNIA RESIDENTS**

This Privacy Notice for California Residents supplements the information contained in Oakwood's Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice.

- **Information We Collect.** Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("**personal information**"). In particular, [www.oakwood.com](http://www.oakwood.com) has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifies	A 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, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some personal information included in this category may overlap with other categories.</p>	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or	No

	retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	No
H. Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information	Current or past job history or performance evaluations.	No
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 24 C.F.R. Part 99)).	Education records directly related to a student maintained by an education institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information or a student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

- **Personal Information Exceptions.** The term personal information does not include:
  1. Publicly available information from government records.
  2. Deidentified or aggregated consumer information.

3. Information excluded from the CCPA's scope, like:
  - a. health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trials;
  - b. personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.
- **Source Category Identification.** Oakwood obtains the categories of personal information listed above from the following categories of sources:
  1. Directly from you. For example, from forms you complete or services you purchase.
  2. Directly from your employer or travel agency.
- **Use of Personal Information.** We may use or disclose the personal information we collect for one or more of the following purposes:
  1. To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a quote or ask a question about our services, we will use that personal information to respond to your inquiry.
  2. To process your requests, purchases, transactions, and payments and prevent transactional fraud.
  3. To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
  4. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
  5. As described to you when collecting your personal information or as otherwise set forth in the CCPA.
  6. To evaluate to conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Oakwood's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Oakwood about our Website users is among the assets transferred.

Oakwood will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

- **Sharing Personal Information.** Oakwood may disclose your personal information to a third party for a business purpose, such as payment processing and resident screening services. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

We share your personal information with the following categories of third parties:

1. Payment processors.
  2. Resident screening services.
  3. Third-party corporate housing providers.
  4. Data aggregators.
- **Disclosure of Personal Information for a Business Purpose.** In the preceding twelve (12) months, Oakwood has disclosed the following categories of personal information for a business purpose:
    1. Category A: Identifiers.
    2. Category B: California Customer Records personal information categories.
    3. Category C: Protected classification characteristics under California or federal law.
    4. Category I: Professional or employment-related information.
    5. Category K: Inferences drawn from other personal information.

We disclose your personal information for a business purpose to the following categories of third parties:

1. Payment processors.
  2. Resident screening and background check providers.
  3. Service providers.
- **Sales of Personal Information.** In the preceding twelve (12) months, Oakwood had not sold personal information. Oakwood does not sell personal information.

## Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

- **Access to Specific Information and Data Portability Rights.** You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising, Access, Data Portability, and Deletion Rights), we will disclose to you:
  1. The categories of personal information we collected about you,
  2. The categories of sources for the personal information we collected about you.
  3. Our business or commercial purpose for collecting or selling that personal information.
  4. The categories of third parties with whom we share that personal information.
  5. The specific pieces of personal information we collected about you (also called a data portability request).
  6. If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
    - a. sales, identifying the personal information categories that each category of receipt purchased; and
    - b. disclosures for a business purpose, identifying the personal information categories that each category of receipt obtained.

We do not provide these access and data portability rights for B2B personal information.

- **Deletion Request Rights.** You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We do not provide these deletion rights for B2B personal information.

- **Exercising Access, Data Portability, and Deletion Rights.** To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by emailing us as [privacy@oakwood.com](mailto:privacy@oakwood.com) or calling us at 866-730-8916.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

1. Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative of the person whom we collected personal information from; and
2. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

- **Response Timing and Format.** We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### **Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

1. Deny you goods or services.
2. Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
3. Provide you a different level or quality of goods or services.
4. Suggest that you may receive a different price or rate for goods or services or different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participate in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

#### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section §1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [privacy@oakwood.com](mailto:privacy@oakwood.com).