

POLICY OF PRIVACY RELATED TO THE TREATMENT OF PERSONAL INFORMATION

Nova Mar Development S.A. branch Colombia

Hotel JW Marriott Bogota

September 1st, 2013

☒ OVERVIEW

Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel, identified with the NIT number 900095648 - 4, as a service and consumption business, located in Calle 73 No. 8 – 60 in Bogotá. In its daily operation, it gathers client's, visitors, suppliers, workers information or any other person for whom we hold their personal data in our database in order to perform our promotion and marketing strategies.

According to the law number 1581 of 2012 and the 1377 act of 2013, that regulate the Protection of Personal Information and any other norms that are currently valid in Colombia. Nova Mar Development S.A., based in Colombia - JW Marriott Bogotá Hotel, informs via this data management policy the terms and conditions of the management and administration of the personal information that are obtained in our different outlets of services and consumption like Restaurante La Mina, Monet, Health Club SPA, Executive Lounge, Front Desk, internet tools, executive visits, fidelity programs among others.

The holder of the information, accepting the terms and conditions of this policy of Hotelería Internacional SA, based in Colombia - Hotel Bogota Marriott, freely authorizes the use of its information according to what it is stated in this document, applying any type of acquisition of this information may it be via phone, virtual or in person, in order to obtain any product, service or benefit and states that the delivery of the information has been given freely, voluntarily and recognizing that he has read and accepted the terms and conditions of this policy.

It is also stated that Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel, located in Calle 73 No. 8 – 60 in Bogotá, phone number: (571) 4816000, is the responsible of managing, treating and administrating the personal information, having the right to give this information to third parties in case it is necessary to perform its promotions and marketing strategies.

☒ PERSONAL DATA

By personal data, it is understood that it covers all personal information related with the racial origin or ethnic; political orientation, religious or philosophical beliefs; syndicate, social organizations, human rights affiliations or those who promote the interest of political parties or that guarantee the rights and warranties of opposing political parties; and those related to health, sex life and biometrical data.

Therefore it is suggested that is needed to analyze the real necessity of providing and/or registering this type of information and if it is the case, authorize by written form the use of such information for the business' best interest

Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel, will gather all personal data and information of its visitors, clients, suppliers and allies and this may include:

- ☐ First and last names.
- ☐ Type and number of identification.
- ☐ Nationality and country of residence.
- ☐ Date of birth and gender.
- ☐ Marital status.
- ☐ LAN and cellular phone numbers (personal and/or from work).
- ☐ Postal and/or email addresses (personal and/or from work).
- ☐ Fax (personal and/or from work).
- ☐ Client's IP, through cookies.
- ☐ Profession or occupation.
- ☐ Employer and job rank.

It will not be required any authorization when the data are of public nature or in any case of medical and/or sanitary emergencies.

☐ DATA TREATMENT

All the data that is gathered by Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel may eventually be shared to all of its branches worldwide, any other company related to Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel, and its business allies in order to be used with the same purpose as stated in this policy.

In case that Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel, needs to share information with third parties that are not branches of our company worldwide or business allies, then it will ask for authorization and permission before sharing the data.

☐ DATA HOLDER'S RIGHTS

All of the data holders may check and revise any information that is related with their identity, registered in our data base, guaranteeing they rights according to the law number 1581 of 2012 and the 1377 act of 2013

If the data holder considers that the registered information in our database must be corrected, updated, suspended or considers that it does not comply with any of the duties stated in the Law of Personal Information Protection, he can then inform it to the head responsible of the treatment of the information in the different service and consumption outlets such as Restaurante La Mina, Monet, Health Club SPA, Executive Lounge, Front Desk, web tools, executive visits, fidelity programs among others. Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel, has the

obligation of making the necessary corrections in case the information is incomplete or wrong according to the holder's indications.

The data holder may request the suspension of their personal data in our data base when he considers that his data is not being treated according to the principles, duties and obligations that are stated in the current norm or that it is no longer necessary for the reason they were once acquired

☒ PROCEDURES TO MAKE USE OF THE RIGHTS

In case one of the holders wishes to make a modification of his information, he can do so by phone, virtually or in person or by any other mean that Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel uses to be in touch with its clients, suppliers and business allies but Nova Mar Development S.A., based in Colombia –JW Marriott Bogota Hotel will not be responsible for the integrity, truthfulness and exactness of the information given.

Depending on the which outlet your data has been given you can make use of your rights to the following email addresses

☒ La Mina Restaurant: mhrs.bogjw.mgr.rest.bar@marriotthotels.com

☒ Monet: mhrs.bogjw.restaurant.mgr@marriotthotels.com

☒ Health Club SPA: mhrs.bogjw.healthclub.Mgr@marriotthotels.com

☒ Hotel JW Marriott Bogota: mhrs.bogjw.frontmgr@marriott.com

mhrs.bogmc.rsv.manager@marriotthotels.com

☒ Sales: mhrs.bogjw.sales.manager@marriotthotels.com

☒ Human resources: mhrs.bogmc.dhr@marriotthotels.com

☒ Purchasing: mhrs.bogmc.purchase.mgr@marriotthotels.com

☒ Preference Plus: mhrs.bogmc.clstr.prefplus@marriott.com

☒ STARTING DATE OF THE POLICY RELATED TO THE TREATMENT OF PERSONAL INFORMATION

The present policy starts to be valid as of September 1st, 2013

By general rule, the terms of the authorization over the use of personal information by the clients and/or users it is understood by the term of the commercial relation or connection to the service and during the exercise of the social purpose of the company.

The authorizations over the data of the clients and/or users may end by will of the holders at any time