Privacy Policy

Last Updated: July 23, 2026

This Virgin Hotels Collection Privacy Policy ("Privacy Policy") describes the privacy practices followed by Virgin Hotels North America, LLC and VLE Limited, collectively d/b/a Virgin Hotels Collection ("Virgin Hotels Collection" or "us" or "we"). It sets out how we collect and use information about guests, visitors and any other individual or entity ("you"), why we use it, when we share it, the rights to which you may be entitled, your choices about our use of your information, and what we do to protect it.

This Privacy Policy covers our use of personal information when you use our websites (www.virginhotels.com and https://www.virginlimitededition.com/), the Virgin Hotels Collection mobile application, our WiFi network, various systems at our properties and restaurants, in-room systems, and any other channel or mobile feature that we operate, make a booking with us, join our mailing list or are otherwise in contact with us (each, a "Site" and collectively, the "Sites") and when you visit/stay as a guest at one of our properties, purchase related services and interact with us offline (collectively, the "Services"). This Privacy Policy will apply whether you have provided the information directly to us or we have obtained it from a different source, such as a third party including strategic business partners.

We ask that you please read this Privacy Policy. If you have any questions about this Privacy Policy you can contact us at privacy@virginhotels.com.

Sections of this Privacy Policy only apply to the collection, use and disclosure of personal information that is subject to data privacy laws applicable in the European Union ("EU") and European Economic Area ("EEA") (including, in particular, the General Data Protection Regulation ("GDPR")) and/or applicable in the United Kingdom (such laws collectively referred to in this Privacy Policy as "European data protection laws"). Where this is the case, the relevant individuals whose personal information is subject to European data protection laws are referred to in this Privacy Policy as "Europeans".

Virgin Hotels Collection is the data controller of personal information of our United States and European guests and visitors accessing the Services.

European, United Kingdom, California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, Nevada, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah and Virginia residents should also review the Privacy Rights and Jurisdiction-Specific Notices sections in this Privacy Policy.

Capitalized terms used but not defined in this Privacy Policy have the definitions provided in our Terms & Conditions. Provisions within the Terms & Conditions may affect this Privacy Policy with respect to your use of the Sites, so please review the Terms & Conditions prior to using the Sites.

Table of Contents:

1. COLLECTION OF PERSONAL INFORMATION

2. EXTERNAL LINKS

3. HOW WE USE YOUR INFORMATION

4. OUR INFORMATION SHARING PRACTICES

5. PRIVACY RIGHTS

6. INFORMATION SECURITY MEASURES

7. MARKETING CHOICES

8. INTERNATIONAL DATA TRANSFERS

9. MINOR CHILDREN

10. DATA RETENTION

11. CHANGES TO THIS PRIVACY POLICY

12. PRIVACY QUESTIONS AND CONTACT INFORMATION

13. JURISDICTION-SPECIFIC NOTICES

1. COLLECTION OF PERSONAL INFORMATION

We collect data about you to provide the services you request on the Sites and the Services offered to you as a guest or visitor at Virgin Hotels Collection locations, ease your navigation on the Sites, communicate with you, and improve your experience using the Sites and Services. Some of this information is provided by you directly to us, such as when you create an account. Some of the information is collected through your interactions with the Sites or third party booking engines, websites, and property management services. We collect such data using technologies like cookies and other tracking technologies, error reports, and usage data collected when you interact with our Sites. Some more information about the use of cookies and other similar technologies can be found in our Cookie Policy, linked in the footer of each Site for Virgin Hotels properties and Virgin Limited Edition properties. Some of the information is collected from your use of, and interactions with, us and others on social media including, but not limited to, Facebook®, Instagram®, Twitter®, Linked®, and YouTube® (collectively "Social Media").

The data about you we collect depends on the Sites and Services and features thereof that you use and the other services from Virgin Hotels Collection that you use, and includes the following:

1.1 Personal Information We Collect From You.

In general, we collect Personal Information, as defined below, that you submit to us in the process of creating or editing your account and profile on the Sites or that you submit to us voluntarily through your use of the Sites or when you visit/stay as a guest at one of our

properties, purchase related services and interact with us offline. Information that identifies, relates to, describes, is capable of being associated with, or could be linked, directly or indirectly, with a particular consumer or household is "Personal Information."

In some instances, you may provide to us Sensitive Personal Information or Special Categories of Personal Information as defined by the privacy laws in some countries (together "Sensitive Personal Information"). The specific categories may vary between countries but for Europeans this means personal information from which we can determine or infer an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health information including physical or mental health condition, medical treatment, genetic data, biometric information, and information about an individual's sexual life or sexual orientation. We only process Sensitive Personal Information to the extent permitted by applicable law. Generally you are not required to provide Virgin Hotels Collection with any of your Sensitive Personal Information, and, unless required by law or for the purposes of health and safety, choosing not to do so will not prevent you from purchasing any Services from Virgin Hotels Collection. We do not generally collect Sensitive Personal Information unless it is volunteered by you. For example, we may use health information provided by you to serve you better and meet your particular needs, such as for the provision of disability access.

Personal Information does not include information that has been de-identified or otherwise made anonymous or information that has been aggregated such that it is no longer possible to identify any specific individual.

The Personal Information which we collect includes, but is not limited to, the following circumstances and data elements:

- If you express an interest in obtaining additional information about our Services, request customer support, use the "Contact Us" or similar features on our Site, register to use our Sites or Services, inquire about one of our properties, or download certain content, we may require that you provide to us your contact information, such as your name, organization, phone number, or email address, and in some instances, you may elect to provide us with location and address information;

- If you use our Contact Us page or our property feedback forms, communicate with us over the phone, report a problem, or have a question about our Services, you may provide us with contact information, such as a phone number or email address, and the details of your communications with us;

- If you decide to stay at one of our hotels, we may collect:

    - Identification information, such as your passport number, name, and date of birth;

    - Contact information, such as your address, email address, phone number;

    - Travel-related information, such as your frequent flyer number, hotel loyalty, honors or rewards numbers, The Know program membership number, account information from third party operators within our branded hotels, preferred airlines, rental car providers, and travel history;

- Your demographic information, such as your date of birth, gender, or number of children;

- Your financial and billing information, such as billing name and address, business title, work contact address, credit card number or debit card number;

- Information about your travel preferences or relating to your reservation, such as the properties you have visited, your arrival and departure dates and any special requests you may make, your guest preferences (including those relating to amenities, facilities, housekeeping and room preference), vehicles you may bring to the properties, on-property services that you may request (including concierge services, health clubs, spa services, activities, child care services, equipment rental, and restaurant or room delivery services), swimming capabilities, and activities you book as part of your stay;

- Information you provide when you give us feedback (e.g. your name and contact details, your arrival date, departure date, address, email address, what you liked about your visit and what we can do to improve);

- Information that may be considered special or sensitive under certain laws, such as dietary or allergy requirements that imply specific religious beliefs or medical conditions, and health / accident/ mobility / disability records;

- Information collected through the use of a close circuit television system, smart or mobile device, card key and other security and technology systems; and

- Information collected from you when you sign up to use hotel WiFi (e.g. your name and contact details).

- If you enroll and participate in our guest loyalty program, including The Know Loyalty Program or other hotel brand guest loyalty program, we may collect contact information, such as name, username, email address, mailing address, zip code, and phone number and also information that you provide, such as your password, account settings, and account preferences;

- If you use the Virgin Hotels Collection mobile application to customize your experience at one of our hotels or locations, we may collect personal identifiers, such as a name or username; contact information, such as email address, mailing address, zip code, and phone number; travel information, such as check-in and check-out dates; location data (as further described below); and information you provide related to your preferences, such as room and travel preferences;

- If you or your organization plans an event or meeting at one our facilities, we may collect Personal Information related to the event or meeting such as the guest list and information about the guests at your event;

- If you register to receive our newsletter, we collect your name and email address;

- If you use our Services, we may collect inference information about what you purchased, when and where you made such purchases, what and how you paid for such purchases, and whether you opened and electronic communications from us;

- If you visit one of our properties for our business purposes (e.g. a journalist or B2B contacts), we may collect your CV (if you travel to the British Virgin Islands), passport information, or the name and age of the children who travel with you;

- If you use and interact with our Sites or emails, we automatically collect information about your device and your usage of our websites or emails through cookies, web beacons or similar technologies, such as Internet Protocol (IP) addresses or other identifiers, which may qualify as Personal Information under applicable law;

- If you voluntarily submit certain information to our Services, such as filling out a survey about your guest experience or entering a contest or promotion, we collect the information you have provided as part of that request.

We may obtain Personal Information about you from business partners (including booking partners), contractors, suppliers, and other third parties and add it to your account information or other information we have collected, and such Personal Information may include your contact details, your passport number, your bank account details, details of any dietary, mobility / disability or room requirements, your medical status, your arrival and departure time, and details of the holiday purchase. We, and the third parties we engage, may combine information we collect from you over time, and across the Sites, with information obtained from other sources. This helps us improve the information's overall accuracy and completeness and also helps us better tailor our interactions with you.

1.2 Automatically Collected Usage and Device Information.

Similar to other websites, we use cookies and other similar technologies (such as tags, pixels, web beacons, web bugs, JavaScript, device IDs, and SDKs) to automatically collect certain technical information from your web browser, mobile, or other device when you visit our Site. This data may include, but is not limited to, your IP address, browser type and language, referring/exit pages and URLs, other browser history, platform type, number of clicks, landing pages, the pages you requested and viewed, the amount of time spent on particular pages, and the date and time of your visits. Our collection of this data, described in more detail below and in our Cookie Policy, allows us to provide more personalized high-quality services to you and to track usage of the Sites.

Where required by applicable law, we will recognize and honor opt-out preference signals (or global privacy controls).

A. *Cookies*.

We use cookies, among other things, to process the Personal Information mentioned above. Cookies are files that are stored on your computer's hard drive and are accessed by our server when you visit the Sites. We use cookies for the purposes set forth in this Privacy Policy and for the preservation of our legitimate interests, to provide a service that is requested by you and,

where applicable, on the basis of your consent. For more information about our use of cookies, including details on how to opt-out of certain cookies, please see our Cookie Policy.

Most web browsers are initially set up to accept cookies, but you can reset your browser to refuse cookies or to indicate when a cookie is being sent. However, some features and services in the Sites (particularly those that require sign-in) may not function properly if your cookies are disabled. Similarly, if you choose to delete session objects from the Sites, you may not be able to access and use all or part of the Sites or benefit from some or all of the information or features and services offered. For more information on how we use cookies, please see our Cookie Policy.

B. *Other technologies (aka tags/pixels/web beacons/web bugs/java script)*.

These technologies may be used for the same purposes as cookies and stored on your hard drive until they expire. These technologies are used to enhance your experience and gather usage and performance data. For example, we may use pixels to automatically record certain technical information about your interactions when you visit the Sites or otherwise engage with us, to help deliver cookies on our Sites, or count users who have visited the Sites. We may also include web beacons in our promotional e-mail messages or newsletters to determine whether you open or act on them for statistical purposes. "Pixels" are tiny graphics (about the size of a period at the end of a sentence) with unique identifiers used to track certain online actions, movements and related information of Site users. Unlike cookies, which are stored on a user's computer hard drive, pixels are embedded invisibly on web pages or in HTML-based emails. The data we receive through pixels allows us to effectively promote the Sites to various populations of users, and to optimize external advertisements about the Sites that appear on third-party websites. For more information, please see our Cookie Policy. As with cookies, we use these technologies for the preservation of our legitimate interests, to provide a service that is requested by you and, where applicable, on the basis of your consent.

C. *Third Party Analytics Providers*.

Cookies and other technologies we use include Google Analytics and other third party analytics providers ("Analytics Providers"). We use these to collect information about Site usage and the users of the Sites. Analytics Providers use Cookies in order to collect demographic and interest-level information and usage information from users that visit the Sites, including information about the pages where users enter and exit the Sites and what pages users view on the Site, time spent, browser, operating system, and IP address. Cookies allow Analytics Providers to recognize a user when a user visits the Sites and when the user visits other websites. Analytics Providers use the information they collect from the Sites and other websites to share with us and other website operators' information about users including age range, gender, geographic regions, general interests, and details about devices used to visit the Sites and other websites and purchase items. For more information regarding Google's use of cookies, and collection and use of information, see the Google Privacy Policy (available at https://policies.google.com/privacy?hl=en). If you would like to opt out of Google Analytics tracking, please visit the Google Analytics Opt-out Browser Add-on (available at https://tools.google.com/dlpage/gaoptout). For more information about the use of third party Cookies and other similar technologies can be found in our Cookie Policy.

1.3 Location Information.

We collect precise geolocation data from you or your device, as well as your address information, e.g., billing address, when you set up your account and order our services. We also collect and use information about your general location (e.g., your state of residence) and can infer your approximate location based on your IP address in order to track our general Site usage or to tailor any pertinent aspects of your user experience to the region where you are located.

If you grant us access to your location in the Virgin Hotels Collection mobile application, we may collect information about your location. Your location can be determined by: GPS, IP address, and information about things near your device, such as Wi-Fi access points and cell towers. When you use our Services via a wireless device, we may solicit your permission to collect your location data. Some features within our Sites may only function upon confirmation of your location, and therefore such features will not be available if you choose not to provide your location data to us. The specificity of the location data collected may depend on a number of factors, including the device you are using (e.g. laptop, smartphone or tablet) and how you are connected to the Internet (e.g., via cable broadband connection, WiFi). If you enable location services for our mobile application or other websites, we may collect location data periodically as you use or leave open our mobile application. We may associate such location data with Personal Information you provide to us. Depending on the platform you use to access our mobile application and other websites (e.g., Apple's iOS, Google's Android), you may be able to control whether location data is collected from within "Settings" or other controls on your wireless device or the mobile application.

1.4 User Contribution Information.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Sites or transmitted to other users of the Sites or third parties, including, for example, third party websites and services like Social Media that are integrated into or linked to the Sites (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. We cannot control the actions of other users of the Sites or third parties with whom you may choose to share your User Contributions. Such third parties may have their own policies and terms that apply to your User Contributions, and we are not responsible for any third party's policies or terms. We cannot and do not guarantee that unauthorized persons will not view your User Contributions.

1.5 Information Collected Through Social Media.

If you interact with us or our other users regarding Virgin Hotels Collection and its products and services on any Social Media: (a) the Personal Information that you submit by and through such Social Media can be read, collected and/or used by us (depending on your Social Media privacy settings) as described in this Privacy Policy, and (b) where Virgin Hotels Collection responds to any interaction with you on Social Media, your account name/handle may be viewable by any and all members or users of Virgin Hotels Collection's Social Media accounts. We are not responsible for the Personal Information that you choose to submit or link on any Social Media. Social Media operates independently from Virgin Hotels Collection, and we are not responsible for Social Media interfaces or privacy or security practices. We encourage you to review the

privacy policies and settings of any Social Media with which you interact to help you understand their privacy practices. If you have questions about the security and privacy settings of any Social Media that you use, please refer to the applicable privacy notices or policies.

1.6 Advertising Information.

We use third party service providers to serve advertisements or collect data on our behalf across the internet and on the Sites ("Advertisers"). Some of these Advertisers may collect your Personal Information about your Site visits and your interactions with our products and services to tailor marketing messages on other sites, or to trigger real-time interactions, customize the Sites, or enhance your profile (also referred to as "online behavioral advertising" or "interest-based advertising"). If you would like more information about Advertisers' practices, please see http://optout.aboutads.info/#!/. You may find more information about entities involved in online advertising and additional choices you may make, including opt-out of having your information used for internet-based advertising, through the Digital Advertising Alliance (the "DAA") at the DAA consumer choice service. The tools provided at the DAA opt-out page are provided by third parties, not Virgin Hotels Collection. Virgin Hotels Collection does not control or operate these tools or the choices that advertisers and others provide through these tools. For more details on this technology and for details of how you may be able to opt-out of the use of your information for this purpose see our Cookie Policy.

2. EXTERNAL LINKS

The Sites contain links to third party websites and services, including links to Social Media. We are not responsible for any of the content or features or functionality of other linked websites or services. We are also not responsible for the privacy practices and the terms and conditions of use for any external websites or services. The linked websites and services may collect Personal Information from you that is not subject to our control. The data collection practices of linked third party websites and services will be governed by that third party's privacy policy and terms of use.

3. HOW WE USE YOUR INFORMATION

3.1 General.

We may use or disclose the Personal Information identified above for one or more of the following business and commercial purposes, and for the purposes described above in the "Collection of Personal Information" section:

- To provide, manage, and administer our Services.
- To fulfill or meet the reason you provided the information (e.g., to help provide lodging and services to you). For example, we need your contact details to make the booking or register you as a guest and payment card details in order to take payment from you.
- To create, maintain, customize and secure your account with us.

- To process your information for marketing and promotions, including to send you our newsletter if you have signed up to receive it, to check your eligibility for competitions and to contact you in the event that you win, and to administer The Know Loyalty Program.

- To personalize your experience and to deliver content and product and service offerings, products, and services relevant to your interests, including holiday ideas, offers and advertisements through third-party sites, and via email (with your consent, where required by law).

- To monitor and help maintain the safety, security, and integrity of our Sites, Services, databases, other technology assets, and business.

- For testing, research, analysis, and product development, including to develop and improve our Sites and Services.

- To personalize and develop our Sites and the services we provide to you and improve our offerings.

- To customize your experience when you use the Virgin Hotels Collection mobile application to set your personal preferences at one of our hotels.

- To provide certain features or functionalities on the Sites.

- To provide you with support, to communicate with you and respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses (including on Social Media). To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

- To prevent illegal activity, fraud, and abuse.

- For business development and business analysis purposes and to carry out internal and group reporting on our performance.

- To reply to the feedback you provide to us or to answer any issues or concerns you may have.

- To monitor guest communications and experiences for quality and training purposes.

- To obtain work permits where required.

- To provide you with medical assistance, if required and provide relevant support services.

- To maintain a record of any accident at our properties.

- For the defense or establishment of legal claims. We will not delete your Personal Information if it is relevant to an investigation or a dispute. It will continue to be stored until those investigations or disputes are resolved.

- When we need to for our legitimate interests to generally administer our operations and business in an efficient and effective way, to improve and develop our services and to research and analyze the services our customers want.

- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about our users is among the assets transferred or liquidated.

- Or as otherwise described to you when collecting your Personal Information or as otherwise set forth in the CCPA.

3.2 Account-Related Emails.

When you create an account with us and provide us with your email we may, subject to applicable law and, where necessary, obtaining your consent, use your email address to send you service-related notices (including any notices required by law, in lieu of communication by postal mail), updates, news, and marketing messages. For example, when you register, you will receive a welcome email. If the Sites or our Services are temporarily unavailable, we may also send you an email.

Email communications you receive from us will generally provide an unsubscribe link or instructions allowing you to opt out of receiving future emails or to change your contact preferences. If you have an account with us, you can also change your contact preferences by updating your contact information within your account settings. Please remember that even if you opt out of receiving marketing e-mails, we may still send you important service information related to your account and the Sites. If you correspond with us by email, we may retain the content of your email messages, your email address, and our responses.

3.3 Non-Personally Identifiable Information.

We may use non-personally identifiable information, such as anonymized, de-identified, and/or aggregated website usage data, in any manner that does not identify individual users for the purpose of improving the operation and management of the Sites, including to develop new features, functionality, and services, to conduct internal research, to better understand Site usage patterns. Any non-personally identifiable information that is combined with Personal Information will be treated by us as Personal Information. To the extent we use de-identified data, we will maintain and use de-identified data without attempting to re-identify the data.

4. OUR INFORMATION SHARING PRACTICES

When we disclose Personal Information for a business or commercial purpose, we aim to ensure we have an appropriate legal basis for such disclosure and, where necessary under applicable law, enter into a contract that describes the purpose and requires the recipient to keep that Personal Information confidential and use only for performance of the contract, and not for any other purpose. We share or make your information available, including any Personal Information, in the circumstances described below.

We disclose your Personal Information for a business or commercial purpose to the following categories of third parties:

- Social Media networks.
- Analytics Providers.
- Property owners, management companies, and employees of our hotels who may use your Personal Information to fulfil your requests and communicate with you about services or resources that we offer.
- Payment Processors or other providers of payments services.
- IT Suppliers, including cloud hosting providers, email providers, and WiFi providers.
- Affiliated persons (other members of our group of companies) or third-party service providers assisting us in the operation, management, improvement, research and analysis of the Sites and Services, such as booking engines, property management, point-of-sale, reservations and payroll systems.
- Affiliated persons (other members of our group of companies) or our third party service providers may augment, extend, and combine non-personally identifiable information with data from additional third party sources in order to assist us with the above. Use of information by affiliated persons and third party service providers will be subject to this Privacy Policy or an agreement that is at least as restrictive as this Privacy Policy.
- Third parties, either with your consent or because we need such third parties to see your information to provide products or Services to you. These include other partners we do business with such as charity organizations, Virgin group loyalty membership schemes and third party activity suppliers approved by Virgin Hotels Collection.
- On-site nurses (where applicable) or third party medical providers in the event that you suffer an accident or an injury whilst visiting one of our properties.

4.1 Legal Requirements.

We reserve the right to disclose all information collected via the Sites, internally, to affiliates, or to third parties, for any lawful purpose or to prevent harm to us or others. For example, and without limitation, in our discretion, we may disclose information to government regulators, law enforcement authorities or alleged victims of identity theft. We may also disclose information if we are defending a legal claim in connection with defending such claim. We may disclose information to tourist boards if you are a journalist or a B2B contact who has provided us with a copy of your CV for the purposes of obtaining a work permit in certain jurisdictions. We will notify you in the event of a government or legal request for your information unless otherwise prohibited by law.

4.2 Organizational Transitions.

If we should ever transfer or restructure the operational ownership of the Sites, such as through a merger with another entity or a reorganization of all or a part of our operational responsibilities or assets, we may disclose, transfer, assign our rights, and/or delegate our duties to your information without notice and consent, including to prospective or actual recipient or acquiring entities. Should this occur, we will require any third party receiving your Personal Information as described under this subsection to be contractually required to provide the same level of privacy compliance as provided by us under this Privacy Policy.

5. PRIVACY RIGHTS

Certain jurisdictions have specific legal requirements and grant privacy rights with respect to Personal Information, and we will comply with restrictions and any requests you submit as required by applicable law. If you are a European, UK, or California resident, see the Jurisdiction-Specific Notices section below for additional information as to your rights and to how to exercise those rights.

Nevada residents have the right to opt out of the sale of certain pieces of their information to third parties who will license or sell their information to others. However, Virgin Hotels Collection does not sell Personal Information as contemplated by Nevada law.

If you are a resident of one of the U.S. states listed below, you have one or more of the following rights: (1) to request additional information about our data collection, use, disclosure, and sales practices in connection with your Personal Information; (2) to request the specific Personal Information collected about you; (3) to request the deletion of the Personal Information we have about you, with exceptions; (4) to request a restriction on certain processing of Personal Information; (5) to request correction of inaccurate information; (6) to opt-out of the processing of Personal Information for the purpose of "profiling" in furtherance of decisions that produce legal or similarly significant effects; and (7) to opt-out of the "selling" and "sharing" ("targeted advertising") of Personal Information as such terms are defined under U.S. state privacy laws. Please note, Virgin Hotels Collection sells Personal Information and shares Personal Information (engages in "targeted advertising"). For a description of the categories of Personal Information that are sold or shared/used for targeted advertising and for a description of the categories of third parties that such Personal Information is disclosed to, see the chart in Section 13.2 (California Residents) below. Virgin Hotels Collection does not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. You may also have the right to not be discriminated against for exercising your privacy rights. If you are a resident of one of the following U.S. states, you have one or more of these rights:

Colorado	Connecticut	Delaware	Indiana
Iowa	Kentucky	Maryland	Minnesota
Montana	Nebraska	New Hampshire	New Jersey
Oregon	Rhode Island	Tennessee	Texas
Utah	Virginia		

If you are located outside that jurisdiction and seek to exercise your rights under the law of another jurisdiction, please contact us by emailing privacy@virginhotels.com.

You may submit a request regarding your Personal Information by:

- Emailing us at privacy@virginhotels.com
- Completing this form online

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. We may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. When you make a request, we may also contact you to ask you for further information in relation to your request to speed up our response and require you to follow procedures so that we can verify your identity (and the applicable jurisdiction). The verification steps we take may differ depending on your jurisdiction and the request. Where possible, we will attempt to match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it. If we cannot verify your request, we may ask you for additional information to help us do so.

We will respond to your request within the time period required by applicable law. However, we may not always be able or required to comply with your request, in whole or in part, and we will notify you in that event.

To opt-out of "selling" or "sharing" ("targeted advertising") personal information (as defined by applicable law) in connection with cookies and similar technologies, please use the "Do Not Sell or Share My Personal Information" link on our Site homepage.

6. INFORMATION SECURITY MEASURES

We use certain physical, managerial, and technical safeguards designed to preserve the security of your information that we maintain in connection with your use of the Sites. For example, we encrypt all data with secure sockets layer (SSL) or similar technologies when we transmit your data. This, however, does not guarantee that your information may not be accessed, disclosed, altered, or destroyed by any breach of our physical, technical or managerial safeguards.

We cannot ensure that all of your Personal Information will be disclosed only in the ways described in this Privacy Policy. For example, third parties may unlawfully intercept or access transmissions or private communications, or users may abuse or misuse your Personal Information that they collect from the Sites. Even with the most rigorous information security standards, no transmission of data over the internet can be 100% secure.

7. MARKETING CHOICES

By providing an email address on the Sites, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any service related notices, or to provide you with information about our hotels, services and loyalty services (including The Know loyalty

program, the Virgin Red loyalty program and Virgin Points). We also currently provide the following marketing opt-out opportunities:

- At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from such communications and services.

- At any time, you can contact us through privacy@virginhotels.com or the address or telephone number provided in the "Privacy Questions and Contact Information" section below, to unsubscribe from communications and service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Information.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service-related notices. You have the right to be free from discrimination based on your exercise of any of your rights under applicable law. We will not discriminate against you by providing a different level or quality of services, charging different prices, or imposing penalties.

8. INTERNATIONAL DATA TRANSFERS

Please be aware that we are headquartered in the United States. The Sites are governed by United States law. If you are using any of our products or services from outside of the United States, your information may be transferred to, stored, and processed in the United States where our servers may be located. The United States might not offer the same level of privacy protection as the country where you reside or are a citizen.

Your Personal Information will only be transferred to the United States or other jurisdiction outside the EEA, EU, or UK if there is a safeguard in place to ensure an appropriate level of data protection for your Personal Information.

9. MINOR CHILDREN

Our Sites are not intended for children under 18 years of age. We do not intentionally gather Personal Information about individuals who are under the age of 18. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 18, please contact us at privacy@virginhotels.com.

10. DATA RETENTION

We retain your Personal Information for as long as necessary for the purpose for which they were initially collected, to carry out legitimate business interests, as well as on the basis of applicable legal requirements (such as applicable statutes of limitation). After expiry of the applicable retention periods, your Personal Information will be deleted. If there is any data that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further use of such data.

The criteria we use to determine the retention period is as follows:

- when your most recent stay at one of our hotels occurred;
- whether there are contractual or legal obligations that exist that require us to retain the data for a period of time;
- whether there is an ongoing legal claim that relates to any business (or otherwise) relationship you have with us, or that is otherwise related to your relationship with us;
- whether any applicable law, statute, or regulation allows for a specific retention period; and
- whether the Personal Information is considered to be Sensitive Personal Information, in which case a shorter retention period generally would be applied.

These criteria may also mean we adjust the period of time we retain the categories of Personal Information detailed above.

11. CHANGES TO THIS PRIVACY POLICY

Because our privacy practices and privacy law necessarily evolve over time, we reserve the right to revise this Privacy Policy from time to time in our sole discretion. If we materially revise this Privacy Policy, we will provide notice to you, such as by posting updated Privacy Policy on the Sites, sending you an email to your account email, or by any other reasonable means. You should periodically review this Privacy Policy to ensure that you are familiar with the most current version. Your continued use of the Sites after the date last updated as posted above will constitute your acceptance of the updated Privacy Policy.

12. PRIVACY QUESTIONS AND CONTACT INFORMATION

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your information described in this Privacy Policy, please do not hesitate to contact us at:

- E-mail: privacy@virginhotels.com
- Mailing Address: Virgin Hotels Collection, 3390 Mary Street, Suite 218, Miami, FL 33133, U.S.A.

13. JURISDICTION-SPECIFIC NOTICES

13.1 European and UK Residents.

Our Legal Basis for Collecting Personal Information.

Whenever we collect Personal Information from you or otherwise process Personal Information about you, we do so on the following legal bases:

1. Your consent to such collection and use (for example, in some jurisdictions, we may need your consent in order to process your Personal Information for direct marketing activities, when using technology such as cookies or when processing your dietary requirements);

2. Out of necessity for the performance of an agreement between us and you, such as your agreement to use our Services or your request for Services or to provide, manage and administer our services, process your booking, take payment and provide refunds;

3. Our legitimate interest, including but not limited to the following circumstances where collecting or using Personal Information is necessary for:

    - Intra-organization transfers for administrative and other legitimate business purposes;

    - Product development and enhancement, where the processing enables Virgin Hotels Collection to enhance, modify, personalize, or otherwise improve our Services and communications for the benefit of our visitors and guests, and to better understand how people interact with our Sites, how they use the Sites any problems users have across multiple devices;

    - Fraud detection and prevention;

    - Defence or establishment of legal claims;

    - Enhancement of our, our employees and third parties' (such as guests) security (including cybersecurity, including improving the security of our network and information systems);

    - General business operations and diligence (for example, to develop and maintain relationships with vendors, partners and other organizations and dealing with individuals who work for them);

    - Understanding customer feedback and in responding to customer communications in a consistent way; and

    - Providing our products and Services to you, including enabling you to update your preferences and settings online,

    provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

        1. Out of necessity to comply with a legal obligation: for example, we may need to disclose your data to a law enforcement agency or to obtain a work permit for you in the British Virgin Islands;

        2. Out of necessity to protect your or other individuals' vital interests: in exceptional circumstances (for example, health related emergencies), we may need to disclose your information to third parties (for example, healthcare providers).

Where we are using your Sensitive Personal Information, we will only do so if required by law, for the purposes of health and safety, or on the basis of your explicit consent (where such consent is required under applicable laws).

Rights of European and UK Residents.

Europeans and those persons who reside in the EEA and UK have rights under European and UK data protection laws. These rights are summarized below. These rights are not applicable in all circumstances and exemptions may apply.

These rights include the following:

- Access – You are entitled to ask us if we are processing your information and, if we are, you can request access to your Personal Information (commonly known as a data subject access request). This enables you to receive a copy of the Personal Information we hold about you and to check we are lawfully processing it.

- Correction – You are entitled to request that any incomplete or inaccurate Personal Information we hold about you is corrected, though we may need to verify the accuracy of the new data you provide to us.

- Erasure – You are entitled to ask us to delete or remove Personal Information in certain circumstances. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Information to comply with local law. There are also certain exceptions where we may refuse a request for erasure, for example, where the Personal Information is required for compliance with law or in connection with legal claims.

- Restriction – You are entitled to ask us to suspend the processing of certain of your Personal Information in one of the following scenarios:

    - If you want us to establish the data's accuracy;
    - Where our use of the data is unlawful but you do not want us to erase it;
    - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
    - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Transfer – You may request the transfer of certain of your Personal Information to another party in some circumstances. To help with that you have a right to ask that we provide your information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. We do not use Personal Information to make automated decisions about you in any situations where you may have a legal right to opt out.

- Object to Processing – Where we are processing your Personal Information based on a legitimate interest (or those of a third party) as the legal basis for that particular use of your Personal Information, you may object to processing on this ground. However, we may be entitled to continue processing your information in certain circumstances. Where your Personal Information is processed in order to send you direct marketing, you are entitled to object to this at any time. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

- Withdraw Consent – Where you have provided your consent to the collection and processing of your Personal Information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

- Right to lodge a complaint with a data protection supervisory authority at any time – You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm. If you are based in the UK, you can make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk).

Exercising Your Rights as a European or UK Resident.

To exercise your rights described above, please submit a verifiable request to us by sending us an e-mail at privacy@virginhotels.com or by completing and submitting a web form located here.

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. Making a verifiable request does not require you to create an account with us. We will only use Personal Information provided in a verifiable request to verify the requestor's identity or authority to make the request.

We try to respond to legitimate requests within one month (or within three months of receipt at the latest, if we require more time and such extension is permitted by applicable laws). Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We may require more time in particular where we have received a large number of requests or complex requests. In such cases, we will inform you of the reason and extension period in writing.

We will deliver our written response electronically (unless you request otherwise). Your rights will be exercisable subject to limitations as provided for by European data protection laws. 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 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 reasonable cost estimate before completing your request.

13.2 California Residents.

Under the CCPA, California residents have specific rights regarding their Personal Information. This section describes Californians' rights and explains how California residents can exercise those rights.

Information Collected About Californians.

During the last twelve (12) months, we have collected the following categories of Personal Information from consumers. Please see our Cookie Policy, linked in the footer of the Sites, for information about the collection and use of Personal Information by third-parties who process information collected by cookies and related technologies that we permit them to use on the Sites. Except as indicated in the "California Job Applicants" section below and the "Collection of Personal Information" section above, we do not seek to collect any other "sensitive personal information" (as defined in the CCPA).

Category (* may constitute "sensitive personal information" under the CCPA)	**Examples of Types of Personal Information We Collect**	**Sold or Shared**	**Disclosed to**
Identifiers	A real name, alias, postal address, unique personal identifier, Social Media username and other online identifier, Internet Protocol address, email address, account name, passport number, frequent flyer number, The Know program member number, other accounts numbers	Sold and shared / Certain information automatically collected through our Sites may be sold or shared, including to advertising and marketing partners and analytics providers.	Service providers, affiliates, partners, marketing and advertising partners, analytics providers
Personal information categories listed in the California Customer Records	A name, signature, physical characteristics or description, address, telephone number, passport number, bank account number, credit card number, debit card number, or any other	Not sold or shared	Service providers, affiliates, partners

statute (Cal. Civ. Code § 1798.80(e))	financial information. Some Personal Information included in this category may overlap with other categories		
Protected classification characteristics under California, federal law*	Physical or mental disability, sex, including gender, gender identity	Not sold or shared	Service providers, affiliates, partners
Commercial information	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, such as food and beverage orders and preferences, room preference, including when you use the Virgin Hotels Collection mobile application	Sold and shared / Certain information automatically collected through our Sites may be sold or shared, including to advertising and marketing partners and analytics providers.	Service providers, affiliates, partners, marketing and advertising partners, analytics providers
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement	Sold and shared	Service providers, affiliates, partners, marketing and advertising partners, analytics providers
Geolocation data*	Physical location or movements, including information collected through card key devices and your precise location information when you use the Virgin Hotels Collection mobile application	Not sold or shared	Service providers, affiliates, partners
Sensory Data	Audio, electronic, visual, thermal, olfactory, or similar information, including information collected through	Not sold or shared	Service providers, affiliates, partners

	the use of close circuit television systems and/or through the Virgin Hotels Collection mobile application		
Inferences drawn from other Personal Information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, including such inferences collected through the Virgin Hotels Collection mobile application	Not sold or shared / Certain information automatically collected through our Sites may be sold or shared, including to advertising and marketing partners and analytics providers.	Service providers, affiliates, partners
Sensitive Personal Information	Health information	Not sold or shared	Service providers, affiliates, partners

California Job Applicants.

When you apply for a job with Virgin Hotels Collection, information may be collected about you in multiple ways: you may provide it to us in connection with your application; we may make observations in the application process or collect information from public information sources; or you may authorize us to collect information from other sources, such as a former employer or reference.

The following table describes our practices with regard to information submitted in the job application process. If you use our Sites in the job application process, additional information may be automatically collected, as described above.

Category (* may constitute "sensitive personal information" under the CCPA)	**Examples**	**Sold or shared**	**Disclosed to**
Identifiers*	Name, email address, Social Security number, phone number, and contact address,	Not sold or shared	Service providers

	username, Social Media username		
Protected Classifications*	Gender, race and ethnicity, date of birth	Not sold or shared	Service providers
Geolocation Information	Location information (e.g., ZIP code, IP address)	Not sold or shared	Service providers
Professional or employment-related information	Employer's name, employer's address	Not sold or shared	Service providers
Education Information	Institutions attended, degrees and certifications attained	Not sold or shared.	Service providers

In certain circumstances, you may submit your application for employment through a third party service that displays our job posting. We do not control the privacy practices of these third party services. Please review their privacy policies carefully prior to submitting your application materials.

Rights Specific to California Residents.

Under the CCPA, a California resident has the following rights: (1) to request additional information about our data collection, use, disclosure, and sales practices in connection with your Personal Information; (2) to request the specific Personal Information collected about you during the previous 12 months; (3) to request the deletion of the Personal Information we have about you; (4) to request a restriction on certain processing of Personal Information; (5) to request correction of inaccurate information, and (6) to opt-out of the selling or sharing of Personal Information, as defined by the CCPA. You may not be discriminated against for exercising your California privacy rights. You may submit a request to exercise your rights under the CCPA through the following means:

- Calling us at 1-833-217-8626
- Completing this form online.

To opt-out of "selling" or "sharing" personal information (as defined by applicable law) in connection with cookies and similar technologies, please use the "Do Not Sell or Share My Personal Information" link on our Site homepage.

You may also designate an agent to exercise your privacy rights on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification.

Upon receiving your request, we will confirm receipt of your request by sending you an email confirming receipt. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. In some instances, such as a request to delete Personal Information, we may first separately confirm that you would like for us to in fact delete your Personal Information before acting on your request.

We will aim to respond to your request as soon as reasonably practicable and consistent with any applicable laws. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. In some cases, our ability to uphold these rights for you may depend upon our obligations to process Personal Information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, listed below, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

California Shine the Light Law.

California Civil Code § 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed Personal Information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with "California Privacy Rights" in the subject line to privacy@virginhotels.com. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response.

Notice of Financial Incentive for California Residents.

Virgin Hotels Collection operates a rewards program, The Know Loyalty Program ("The Know Program"). The Know Program is an optional loyalty reward system. Enrollment in The Know Program is free and no purchase is required to sign up for the program. As part of The Know Program, Virgin Hotels Collection offers certain hotel rates, upgrades and special events based on the points a customer achieves when staying at one of our properties. Those benefits are described along with other material terms and conditions here. In order to be a member of The Know Program, a customer must register for an account online.

Our collection of The Know Program members' Personal Information (including name, mailing address, zip code, telephone number, credit, debit or payment account information and email address and other Personal Information as described above in the "Collection of Personal Information" section) allows Virgin Hotels Collection to operate The Know Program and provide membership benefits. Under the CCPA, the categories of Personal Information collected for The Know Program include the following:

- Identifiers such as name, mailing address, email address, telephone number, zip code;
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) such as payment card information; and

- Inferences drawn from one or more of the above, including a member's hotel stay history, that reflect a member's preferences.

Virgin Hotels Collection uses the Personal Information of The Know Program members to both award and redeem points. Otherwise, the types of Personal Information that we collect from members are generally similar to the types of Personal Information that we collect from individuals who are not The Know Program members. The amount of Personal Information that we collect from a member or non-member may vary and is dependent on the level of interactions and engagement that the member or non-member has with Virgin Hotels Collection.

To form the basis for offering the financial incentive, Virgin Hotels Collection has made the following good faith estimate of the value of consumers' data based on expenses related to the collection, retention, and offering of The Know Program pursuant to the valuation options mandated by the CCPA regulations. This estimate is calculated by dividing the annual value of the revenue generated from the commercial relationships we have with our loyalty partners with respect to consumer data, by the number of US members in our Program. This estimate is not specific to any individual customer and varies per customer. We have based this good-faith estimate on the value that arises from our commercial relationships and the collection and retention of the Personal Information of customers who have voluntarily signed up and chosen to remain in The Know Program. The value of The Know Program benefits to members varies significantly as individual members take advantage of The Know Program benefits to varying degrees. Our valuation number will constantly evolve as membership fluctuates. If you'd like to submit a request to view our valuation number, please contact us at the email below.

You may cancel your membership in The Know Program at any time by submitting the request through your online account or send an e-mail to: privacy@virginhotels.com.