

ANNEX 3.1 – ADDITIONAL PRIVACY PROVISIONS APPLICABLE TO PROCESSING OF PERSONAL INFORMATION OF RESIDENTS OF CERTAIN COUNTRIES - CHINA

This Annex applies to you if you reside in China or your Personal Data is processed by us while you are travelling or staying within China. The terms set out in the Annex are in addition to the terms set out in the main body of the Privacy Notice and form an integral part of the Privacy Notice. In the event of any conflict or inconsistency between the main body of the Privacy Notice and the terms of this Annex, this Annex shall prevail.

For purpose of this Annex, “China” refers to mainland China, excluding Hong Kong Special Administrative Region (“SAR”), Macau SAR, and Taiwan Region.

How do we collect and process your Personal Data

Collection and use of Personal Data

Regarding the types of Personal Data that we collect from you and how and why we use it, please refer to the columns 1 to 3 of the table set out in the Annex 2 of this Privacy Notice (List of Personal Data Processing Activities).

Device permission

Our applications (including the Radisson Hotels App) may need to request the following device permissions to collect and process your Personal Data and other information.

What permission may be requested by us and why we may request it?	What data may we collect from you?	How to manage and disable the permission?	What are the consequences for not setting the permission?
Notifications - The app explicitly requests authorization to send notifications when you open the app for the first time.	<ul style="list-style-type: none"> - Channel ID - App locale (language) - Device locale (language & country) - User timezone - Platform (iOS / Android) - App version - Device model - OS version 	<p>After you grant or deny access, you can change access later.</p> <ul style="list-style-type: none"> - On iOS, go to Settings > Apps > Radisson Hotels app > Tap a permission category - On Android, go to Settings > Radisson Hotels app > Tap a permission category <p>You can revoke or grant permissions for each category or app as needed.</p>	<p>You may not be able to receive push notifications. However, you can still receive in-app messages when you open the app.</p>
Location - The app explicitly requests authorization to access user location when you want to launch a search for nearby hotels. You also have the choice to allow once or while using the app.	<ul style="list-style-type: none"> - Your location information 	<p>After you grant or deny access, you can change access later.</p> <ul style="list-style-type: none"> - On iOS, go to Settings > Apps > Radisson Hotels app > Tap a permission category - On Android, go to Settings > Radisson 	<p>You may not be able to launch a search for nearby hotels using your current location. However you can still type it.</p>

		Hotels app > Tap a permission category You can revoke or grant permissions for each category or app as needed.	
Microphone - The app explicitly requests authorization to access microphone when you want to use the search bar microphone (allowing them to conduct voice searches by speaking their destination instead of typing it)	- This permission does not result in the collection of any additional Personal Data	After you grant or deny access, you can change access later. - On iOS, go to Settings > Apps > Radisson Hotels app > Tap a permission category - On Android, go to Settings > Radisson Hotels app > Tap a permission category You can revoke or grant permissions for each category or app as needed.	You may not be able to conduct voice searches by speaking the destination. However you can still type it.
Calendar - The app explicitly requests authorization to access the device's Calendar app when the you want to add an existing reservation	- This permission does not result in the collection of any additional Personal Data	After you grant or deny access, you can change access later. - On iOS, go to Settings > Apps > Radisson Hotels app > Tap a permission category - On Android, go to Settings > Radisson Hotels app > Tap a permission category You can revoke or grant permissions for each category or app as needed.	You may not be able to let the app add the reservation info on your calendar. However you can still enter it manually.
Bluetooth - The app explicitly requests authorization to use Bluetooth when you want to use the digital key	- Device ID	After you grant or deny access, you can change access later. - On iOS, go to Settings > Apps > Radisson Hotels app > Tap a permission category - On Android, go to Settings > Radisson Hotels app > Tap a permission category You can revoke or grant permissions for each category or app as needed.	You may not be able to use the digital key to open the door lock at participating properties. However you can always use the physical key card.

Entrusted processing and sharing of Personal Data

Entrusted processing

Like most international hotel brands, we may outsource the processing of certain functions and/or information to other Radisson Hotel Group entities and other third-party service providers (such as suppliers that provide

customer care assistance for reservations, complaint handling and/or loyalty operations; advertising, marketing, digital and social media agencies to help us deliver advertising, marketing, and campaigns, to analyze their effectiveness; third parties that assist and help us in providing IT services, such as platform providers, hosting services, maintenance and support on our databases as well as on our software and applications; payment service providers and credit reference agencies for the purpose of assessing your credit score and verifying your details where this is a condition of entering into a contract with you; lawyers, auditors, financial advisors, and other third-party service providers in connection with their services to Radisson), and thus such Third Parties may Process your Personal Data on our behalf. When we outsource the Processing of your Personal Data to Third Parties, we require those Third Parties to protect your Personal Data with appropriate security measures.

Sharing of Personal Data

Your Personal Data may be disclosed to the parties listed below for the corresponding purposes:

- To **your travel agents**, for the agents to provide you with a single source for purchasing travel-related services. This Privacy Policy does not apply to information that you provide directly to your travel agents.
- **To the hotels operating under a Radisson brand or Radisson managed hotels of your choice and other Radisson Hotel Group entities**, who have a limited right to use certain Personal Data for their own purposes such as for complying with their own legal obligations (including maintaining books and records and other compliance obligations).
- In the event of any **change, merger, acquisition, reorganization, or liquidation** involving the transfer of Personal Data, we will ask the new company or organization holding your Personal Data to continue to Process your Personal Data in accordance with this Privacy Policy. If the new company or organization needs to use your Personal Data for purposes not stated in this Privacy Policy, they will obtain your consent in accordance with the applicable laws and regulations.
- To the **relevant law enforcement body, regulatory, government agency, court or other third party** where we believe that such disclosure is to (1) comply with an applicable law or regulation; (2) exercise, establish or defend our legal rights; or (3) protect your vital interests or those of any other person.

Details of SDKs

To provide and optimize our services, third-party SDKs are embedded in our applications (including Radisson Hotels). The following lists the names of the third-party SDKs we currently embed, the types of Personal Data collected, and the purpose of collection and use. If you have questions about the collection of your Personal Data by the third parties through the SDKs, please refer to the privacy policies of such third parties.

Platform	Name of the SDK	Provider of the SDK	Types of Personal Data collected by the SDK	Purpose and Function of the SDK	Link to Privacy Policy of the SDK
iOS	AkamaiBMP	Akamai	Device and usage Data	Bot manager detection	https://www.akamai.com/es/legal/privacy-statement
iOS	Airship	Airship	Application usage	Personal notifications	https://www.airship.com/legal/privacy/
iOS	Firebase	Google	Unique identifiers	Analytics and application	https://policies.google.com/privacy?hl=en-419

			Device type and settings Operating system Application version number Interaction with the application Crash reports	crashes information	
iOS	JWPlayer-SDK	JW Player	Device IP address Device version Device type	Video player	https://jwplayer.com/legal/privacy/
iOS	QubitSDK	Coveo	Device IP address Device version Device type	Event Tracking	https://www.coveo.com/en/company/legal/privacy/privacy-notice
iOS	Tealium	Tealium	Device IP address Device version Device type User interaction	Analytics	https://tealium.com/privacy-notice/
iOS	YandexMobileMetrics	AppMetrica	Device IP address Device Version Device type User interaction	Russian Analytics	https://yandex.com/legal/confidential/
iOS	Quantum Metric	Quantum Metric	Device IP address Device Version Device type	Analytics	https://www.quantummetric.com/legal/privacy-policy/

			User interaction		
iOS	ZDK	Zaplox	Bluetooth	Digital Key	https://zaplox.com/privacy-policy/
iOS	SeosMobileKeysSDK	Assa Abloy	Bluetooth	Digital Key bluetooth communications	https://www.assaabloyentrance.com/global/en/privacy-center
iOS	LegicMobileSDK	Legic	IP address Date and time of enquiry Content of request (specific page) Access status/HTTP status code Volume of data transmitted Operating system and its interface	Digital Key Mobile credentials	https://www.legic.com/data-privacy-statement
iOS	SaltoJustINMobileSDK	Salto Systems	Bluetooth	Digital Key Access Control	https://saltosystems.com/en/legal-data/privacy/privacy-policies/salto-systems/
iOS	TRFramework	Carrier Global Corporation	Key series number derived from Onity Universal ID	Digital Key storage	https://www.corporate.carrier.com/legal/privacy-notice/
iOS	SwiftYRSA		Public key	Public key RSA encryption	
iOS	SwiftYLocation		User location	User geolocation	
Android	AkamaiBMP	Akamai	Device and	Bot manager detection	https://www.akamai.com/es/legal/privacy-statement

			usage Data		
Android	Location	Google	User Location	Show maps and user location on the app	https://policies.google.com/privacy
Android	YandexMobileMetrics	AppMetrica	Device IP address Device Version Device type User interaction	Russian Analytics	https://yandex.com/legal/confidential/
Android	Zaplox	Zaplox	Bluetooth	Digital Key	https://zaplox.com/privacy-policy/

Cross-border transfer of Personal Data

To facilitate Radisson's global business, in the business scenarios listed below, we may transfer your Personal Data outside of China (including countries such as the United States, Ireland etc.) to our affiliates outside of China (Radisson Hospitality Belgium SRL, which can be contacted by email at dataprotection@radissonhotels.com or via the Global [Privacy Center](#)). We will only make such transfers to the extent necessary to fulfill a contract, provide a service, or act as otherwise directed by you. For the cross-border transfer of your Personal Data, we will complete the governmental assessments or filings required by applicable laws.

For each business scenario that may involve the cross-border transfer of your Personal Data, we provide in the table below of the transfer purpose, types of Personal Data transferred, the processing purpose and processing method of the foreign recipient:

Business scenario	Purpose of transfer	Type of information transferred	Processing purpose of the foreign recipient	Processing method of the foreign recipient
Hotel room reservation	Enable you to reserve a room	First name, last name, gender, nationality, email, Radisson rewards number, city, postal code, phone number, street name, street number, date of birth (optional), place of birth (optional), language (optional), region (optional), country (optional), accommodation information	To make hotel room reservation for you	Use, storage, transmission and other processing necessary to realize the purpose

Hotel stay – customized accommodation services	Accommodate your stay and provide you with customized hospitality services	First name, last name, gender, nationality, email, Radisson rewards number, city, postal code, phone number, street name, street number, date of birth (optional), place of birth (optional), language (optional), region (optional), country (optional), accommodation information	To provide you customized hospitality services	
Radisson Rewards Loyalty Program management	Offer and manage our loyalty programs and provide you with Radisson Rewards benefits	Name, last name, email, country, gender (optional), phone number (optional), loyalty card number, password, identity information (including passport number, national ID, driving license and other identity card ID) (optional), personal bank account details	Offer and manage our loyalty programs and provide you with Radisson Rewards benefits	

Your rights

You are conferred by the applicable data protection laws with the following data subject rights.

- **Right of access.** You are entitled to a copy of the Personal Data we hold about you and to learn details about how we Process it. We may require you to prove your identity before providing the requested information.
- **Right to rectification.** We take reasonable steps to ensure that the Personal Data we hold about you is accurate and complete. However, if you believe this is not the case, you have the right to request that any incomplete or inaccurate Personal Data that we Process about you is amended.
- **Right to deletion.** You have the right to ask us to delete your Personal Data, for example where the Personal Data we collected is no longer necessary for the original purpose, where the Personal Data has become obsolete or where you withdraw your consent (if we are Processing your Personal Data based on your consent). However, this will need to be balanced against other factors. For example, we may not be able to comply with your request due to certain legal or regulatory obligations.
- **Right to restriction of processing.** You are entitled to ask us to stop using your Personal Data.
- **Right to data portability.** You have the right to ask us to transfer your Personal Data that you have provided to us to a third party of your choice. This right can only be exercised in certain circumstances as provided by Chinese laws.
- **Rights relating to automated decision-making.** You have the right not to be subjected to automated decision-making, including profiling, which produces legal effect for you or has a similar significant effect. If you believe you have been subject to an automated decision and do not agree with the outcome, you can contact us using the details below and ask us to explain, and you also have the right to refuse the decisions made only through automated decision-making methods.

- **Right to withdraw consent.** We may ask for your consent to Process your Personal Data in specific cases. When we do this, you have the right to withdraw your consent at any time. We will stop the further Processing as soon as possible after the withdrawal of your consent. However, this does not affect the lawfulness of the Processing before consent was withdrawn.

You can exercise the above rights, where applicable, by contacting Radisson's Privacy Office via the [Privacy Center](#). We will respond to your requests of exercising your data subject rights within 30 days. For your requests of exercising your data subject rights with respect to mobile App only, to the extent applicable regulation requires a shorter response period, we will follow such shorter response period to respond to your request.

TO THE EXTENT AS PERMITTED BY LAWS AND REGULATIONS, WE MAY NOT BE ABLE TO RESPOND TO YOUR REQUEST OF EXERCISING YOUR RIGHTS IN THE FOLLOWING CIRCUMSTANCES:

- IF YOUR REQUEST IS CONTRARY TO OUR OBLIGATIONS UNDER LAWS AND REGULATIONS;
- IF THE REQUESTED DATA IS DIRECTLY RELATED TO NATIONAL SECURITY OR NATIONAL DEFENSE SECURITY;
- IF THE REQUESTED DATA IS DIRECTLY RELATED TO PUBLIC SAFETY, PUBLIC HEALTH, OR SIGNIFICANT PUBLIC INTEREST;
- IF THE REQUESTED DATA IS DIRECTLY RELATED TO CRIMINAL INVESTIGATIONS, PROSECUTIONS, TRIALS AND ENFORCEMENT OF JUDGMENTS, ETC.;
- IF WE HAVE SUFFICIENT EVIDENCE OF YOUR SUBJECTIVE MALICE OR ABUSE OF RIGHTS;
- IF IT IS IN THE INTEREST OF SAFEGUARDING YOUR OR OTHER INDIVIDUALS' SIGNIFICANT LEGITIMATE RIGHTS AND INTERESTS, SUCH AS LIFE AND PROPERTY, BUT IT IS DIFFICULT TO OBTAIN YOUR AUTHORIZATION OR CONSENT;
- IF RESPONDING TO YOUR REQUEST TO EXERCISE YOUR RIGHTS WOULD RESULT IN SERIOUS HARM TO YOUR OR OTHER INDIVIDUALS' OR ORGANIZATIONS' LEGITIMATE INTERESTS;
- IF THE REQUESTED DATA INVOLVES TRADE SECRETS.