



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Office of the Secretary

December 20, 2024

John Davisson, EPIC Director of Litigation & Senior Counsel
Chris Frascella, EPIC Counsel
Matt Contursi, IPIOP Clerk
Electronic Privacy Information Center
1519 New Hampshire Avenue, NW
Washington, DC 20036

Re: *In the Matter of Marriott International Inc., et al.*, File No. 192-3022

Dear Mr. Davisson, Mr. Frascella, and Mr. Contursi:

Thank you for your comment regarding the Federal Trade Commission's ("FTC") proposed consent agreement in the above-titled proceeding against Marriott International Inc. and Starwood Hotels & Resorts LLC (collectively, "Marriott"). The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission is committed to protecting consumers from deceptive, unfair, and other unlawful practices, and we appreciate your feedback on this matter.

According to our complaint, Marriott violated the FTC Act by engaging in deceptive and unfair practices relating to the data security of the personal information of its consumers.

The proposed order, among other things, requires Marriott to establish, implement, and maintain a comprehensive information security program. The program must include specific safeguards that address Marriott's data security shortcomings. Marriott must undergo initial and biennial information security assessments by an independent, third-party professional for 20 years. It must also provide a clear and conspicuous method by which U.S. consumers can request that Marriott review the consumer's Loyalty Rewards Program for any unauthorized activity that occurred within the preceding 12 months, and restore any points reduced by unauthorized activity. Marriott must also provide a link on their website and mobile apps where all U.S. consumers may request deletion of personal information associated with an email address and/or Loyalty Rewards Program account number. Marriott must retain personal information for only as long as is reasonably necessary to fulfill the purpose for which it was collected and disclose the purpose and business need for retaining personal information in Marriott's privacy policy.

In your comment, you note that EPIC supports the FTC's proposed consent agreement with Marriott as is, and commends the FTC for exercising its authority to investigate and take enforcement actions against companies that engage in unfair and deceptive practices. EPIC is particularly supportive of the proposed order's injunctive relief related to vendor oversight, working with a third-party auditor, and data minimization. EPIC also commends the Commission's coordination with state attorneys general, as they can be valuable partners in

safeguarding consumer privacy and incentivizing companies to take their data security obligations seriously. We appreciate EPIC's support of the proposed consent agreement, and the Commission will continue to use its unfairness authority when appropriate to protect consumers.

Having considered all the facts of this case and the comments submitted in response to the consent agreement, the Commission has now determined that the public interest would be best served by issuing the Complaint and the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the Commission's analysis to hear from a variety of sources in its work, and it thanks you again for your comment.

By direction of the Commission, Commissioner Holyoak and Commissioner Ferguson recused.

April J. Tabor
Secretary



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Comment from Banks, B.

Re: *In the Matter of Marriott International Inc., et al.*, File No. 192-3022

Dear B. Banks:

Thank you for your comment regarding the Federal Trade Commission's ("FTC") proposed consent agreement in the above-titled proceeding against Marriott International Inc. and Starwood Hotels & Resorts LLC (collectively, "Marriott"). The Commission has placed your comment on the public record, pursuant to Rule 4.9(b)(6)(ii) of the Commission's Rules of Practice, 16 C.F.R. § 4.9(b)(6)(ii). The Commission is committed to protecting consumers from deceptive, unfair, and other unlawful practices, and we appreciate your feedback on this matter.

According to our complaint, Marriott violated the FTC Act by engaging in deceptive and unfair practices relating to the data security of the personal information of its consumers.

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In your comment, you note your support for the FTC's proposed consent agreement with Marriott. You note that "without proper oversight, [the] Marriott corporation may not adequately remove vulnerabilities to customer information and privacy." We appreciate your support of the proposed consent agreement.

Having considered all the facts of this case and the comments submitted in response to the consent agreement, the Commission has now determined that the public interest would be best served by issuing the Complaint and the Decision and Order in the above-titled proceeding in final form without any modifications. The final Decision and Order and other relevant materials are available from the Commission's website at <http://www.ftc.gov>. It helps the

Commission's analysis to hear from a variety of sources in its work, and it thanks you again for your comment.

By direction of the Commission, Commissioner Ferguson and Commissioner Holyoak recused.

April J. Tabor
Secretary