

PERSONAL INFORMATION HANDLING POLICY

Andaz Seoul Gangnam (“Andaz Seoul Gangnam”; andazseoulgangnam.com) values highly the personal information of its guests. It has enacted a personal information handling policy as described below in order to handle smoothly any and all complaints of the guests while protecting their personal information and rights. Andaz Seoul Gangnam informs you as to the purpose of use and methods of processing image information with this personal information handling policy. When the policy is amended, such will be notified through its website (or individually).

1. Purposes of handling personal information and items collected, retention period
2. Provision of personal information to third parties
3. Protection of personal information belonging to minors below 14 years
4. Destruction of personal information
5. Entrustment of personal information handling
6. Security of personal information
7. Rights and duties of information subjects and methods for their exercise
8. Persons responsible for personal information
9. Remedies for any infringement of rights and benefits of information subjects
10. Amendment to the personal information handling policy

1. PURPOSES OF HANDLING PERSONAL INFORMATION AND ITEMS COLLECTED, RETENTION PERIOD

Andaz Seoul Gangnam processes personal information for general purposes as described below. The processed personal information is not used for purposes other than those described below, and the company will obtain prior agreement when the purposes are changed:

PURPOSES

CLASSIFICATION	USAGES
Provision of goods or services	Stay in hotel rooms, use of restaurants, membership administration, delivery of goods, provision of services, delivery of invoices, provision of contents, provision of customized services, user authentication, age verification, fee payment, settlement, etc.
Utilization for marketing and advertisement	Development of new services (or products), provision of customized services, provision of information concerning events and ad messages, provision of participation opportunities, verification of validity of services, survey of access frequencies, statistics concerning membership services, etc.
Personal image information	Prevention and investigation of crimes, facility safety, fire prevention, etc.

PERSONAL INFORMATION HANDLING AND RETENTION PERIOD

CLASSIFICATION	PURPOSE OF COLLECTION	RETENTION PERIOD	COLLECTION METHODS
Reservation of restaurant seats	Contact and provision of information for the performance of services, delivery of notices, communication	Until the service subscription expires or until the time permitted under the statutes	Website, reservation by phone

	channels for complaint handling, etc.		
Guestroom reservation	Contact and provision of information for the performance of services, delivery of notices, communication channels for complaint handling, confirmation of guestroom booking, data used for the provision of customized services, etc.	Until the service subscription expires or until the time permitted under the statutes	Website, reservation by phone
Fitness Membership	User identification and subscription to membership, application for family membership, procedure for verifying family membership, provision of services, contact means for emergency situation, communication channel for the smooth handling of customers' complaints or provision of the latest promotion and other information, business or corporate review and subscription, verification of corporate users, authentication of users (Gangnam district office)	Until membership is terminated (withdrawn)	Agreement to the collection and use of personal information
Registration of spa customers	User authentication, provision of revisit service, communication channel for spa reservation service or promotion, treatment counseling, and preparation of home-care cards	Up to six months after use of service	Spa Immunity Agreement Agreement to the collection and use of personal information
Registration of hotel guests	Hotel guest authentication at the time of check-in, provision of services,	One year from check-out date (up to five years in case of certain disputes)	Guest registration card

	emergency contact, survey of customer satisfaction level, management of travel service, vehicle operation, survey of guest satisfaction level, subscription to membership, granting and use of points, other membership administration processes, transmission of promotional messages and direct mail		Agreement to the collection and use of personal information (Registration Card)
Wedding ceremony contract	User authentication, contact information for service performance, communication channel for notification and complaint handling	Three years from the event completion	Contract
Banquet [event] contract	User authentication, contact information for service performance, communication channel for notification, and complaint handling	Three years from the event completion	Contract
Participation or entry in events	Contact information for service performance	Given period after the event completion (to be specified in event details)	Entry coupon, safety agreement, etc.

ITEMS OF PERSONAL INFORMATION HANDLED

Andaz Seoul Gangnam registers, discloses, and otherwise processes the personal information files for the purposes below pursuant to Article 32 of the Personal Information Protection Act. The items of information below may be generated and collected automatically in the processes of service use or provision. (Records concerning service use, access log, cookies, access IP information, etc.)

CLASSIFICATION		ITEMS COLLECTED
Reservation of restaurant seats	Essential	Full name, phone number, e-mail address
Online guestroom reservation	Essential	Name, address, phone number, e-mail address, credit card number
	Optional	Air flight information, preferred utilities, World of Hyatt Membership No.
Fitness Membership	Essential	Full name, civil status, full name, date of birth of spouse and children, mobile phone number, e-mail address,

		phone number, representative phone number, and direct line phone number
	Optional	Date of birth, home address, company name, company address, position
	Unique identification information	Resident registration code
Spa	Essential	Full name, mobile phone number, address, e-mail address, full name, mobile phone number, civil status, full name and date of birth of spouse and children, and credit card number
	Optional	Room number, e-mail address, date of birth, home address, company name, company address, position
	Sensitive information (essential)	Information that needs to be notified before treatment, including allergy, wounds, and body parts requiring intensive care or care that needs to be avoided, medical records concerning health and skin state before the visit
	Unique identification information	Passport information, diplomat passport number, resident registration number
Registration of hotel guests	Essential	Full name, address, phone number, e-mail address, passport number, nationality, language selected, credit card number
	Optional	Company name, position, date of birth, member number, agreement to the provision of information to third parties, subscription to Hyatt World membership, agreement to the provision of personal information overseas, full name, address, language selected, e-mail address, flight number, preferred utilities, member number
	Unique identification information	Passport number
Wedding ceremony contract	Essential	Name, mobile phone number
Wedding ceremony contract	Essential	Name, company name, phone number, e-mail address
Participation or entry in events	Essential	Full name, phone number, e-mail address (if required), name, phone number of guardians, and room number
	Optional	Special information of event participants

2. PROVISION OF PERSONAL INFORMATION TO THIRD PARTIES

The personal information collected and retained by Andaz Seoul Gangnam is not provided to any third parties without the consent of the users. In the following cases, however, the personal information may be provided to third parties:

PERSONAL INFORMATION MAY BE PROVIDED WITHOUT THE MEMBER'S CONSENT PURSUANT TO THE PROVISIONS UNDER THE RELEVANT STATUTES:

1. When required to invoice service rates (points) or to deliver goods;
2. When information is provided in a format that disables the identification of specific individuals for statistics preparation, academic research, or market research;

3. When provided pursuant to a statute or requested by a law enforcement agency for criminal investigation based on procedures or methods set forth under the relevant statutes

ITEMS THAT REQUIRE CONSENT WHEN PERSONAL INFORMATION IS TO BE PROVIDED TO THIRD PARTIES:

1. Full name (name of corporation or organization) and contact address of the party provided with personal information
2. Purposes of using personal information of the party provided with personal information and items of personal information to be provided
3. Period of retention and use of personal information by the party provided with personal information
4. Fact that the user has the right to withhold consent to and request the details of disadvantages if any, when consent is withheld

3. PROTECTION OF PERSONAL INFORMATION BELONGING TO MINORS BELOW 14 YEARS

In administering the members who can stay at the hotel, the company does not collect the personal information of children below 14 years pursuant to the Juvenile Protection Act. To collect information concerning minors below 14 years in connection with the hotel business, the hotel may collect from the minors the full name and contact phone numbers of their legal agent in order to obtain the consent of the legal agent. The personal information collected concerning the legal agent is used only for the consent to the collection of minors' personal information and will be automatically destroyed when not consented to within five days.

4. DESTRUCTION OF PERSONAL INFORMATION

Andaz Seoul Gangnam destroys the relevant personal information without delay when the retention period under the statutes lapses or when the handling purpose is attained. Note, however, that this does not apply when personal information is to be archived based on other statutes. The destroying procedure, retention period, and destroying methods are as follows:

DESTROYING PROCEDURE AND RETENTION PERIOD

The information entered by the users is immediately destroyed pursuant to internal policies and relevant statutes when the retention period lapses or the handling purpose is attained. Furthermore, the personal information transferred to the database is not used for other purposes unless set forth otherwise under the relevant statutes.

DESTROYING METHODS

The personal information handled by this company is destroyed using the following methods:

Digital files: Permanently deleted by an irrecoverable method

Records, printed matters, documents, and recording media other than digital files: Shredding or incineration

5. ENTRUSTMENT OF PERSONAL INFORMATION HANDLING

When concluding an outsourcing contract, Andaz Seoul Gangnam specifies the items related to the prohibition of personal information handling for purposes other than those for performing its duties as per Article 25 of the Personal Information Protection Act, technical and administrative protective measures, restriction of subcontracting, and its responsibilities for the control and supervision of the outsourced contractors and damage compensation. At the same time, it collects a sworn security statement from the personal information outsourced processors (provision) under Annex 3 "Personal Information Internal Management Plan." It also periodically controls, supervises, and audits the contractors to ensure the secure handling of the personal information. When the contents of the outsourced services or the contractors are changed, it will disclose the details through its personal information handling policy without delay.

6. SECURITY OF PERSONAL INFORMATION

Andaz Seoul Gangnam takes the technical, administrative, and physical actions required to secure safety pursuant to Article 29 of the Personal Information Protection Act as follows:

- 1) Development and enforcement of internal control plans
Andaz Seoul Gangnam develops and enforces internal control plans for personal information based on its guidelines for the security of personal information.
- 2) Appointment of minimum personal information handlers and their education
Andaz Seoul Gangnam appoints the minimum number of personal information handlers and conducts education for them periodically.
- 3) Restriction of access to personal information
The company takes the necessary measures to control access to personal information by assigning, modifying, or deleting authority to access the database system that processes personal information. It also controls any unauthorized access from outside using intrusion blocking and prevention systems.
- 4) Storage of access records and prevention of forgery and tampering
The company stores and maintains records concerning access to the personal information handling system for over six months. It utilizes security functions to prevent their forgery, tampering, theft, and loss.
- 5) Encryption of personal information
The users' password among personal information is known to the users only as stored and kept encrypted one way. The company employs additional security functions for key data, including encrypted storage or transmission of files and data and file locking functions.
- 6) Technical countermeasures against hacking
To block leaks of or damages to personal information due to hacking or computer viruses, the company installs security programs and periodically updates or inspects them. It installs the systems in areas external access to which is controlled. It monitors and blocks the systems technically and physically.
- 7) Control of access by unauthorized personnel
The company has a physically separated space for personal information systems storing personal information. It operates an access control procedure it developed for the purpose.
- 8) Periodic internal audit performed
Andaz Seoul Gangnam periodically conducts internal audits to secure safety in handling personal information.
- 9) Locking devices used to secure documents
Andaz Seoul Gangnam stores documents containing personal information, auxiliary storage media, etc. in a safe place equipped with locking devices.

7. RIGHTS, DUTIES, AND METHODS FOR THE EXERCISE OF INFORMATION SUBJECTS, INCLUDING THOSE FOR REQUESTING REVIEW, CORRECTION, DELETION, AND DISCONTINUANCE OF HANDLING

The users may exercise the following rights as information subjects (or their legal agents):

- 1) Request for review of personal information
- 2) Request for correction or deletion of personal information
- 3) Request for discontinuance of personal information handling

You may exercise your rights by filling out and submitting Annex 8 Form of the Enforcement Rules of the Personal Information Protection Act by mail, e-mail, or fax. The company will take actions without delay. When an information subject requests correction or deletion of errors in the personal information, the company will suspend its use or provision of the personal information until the errors are corrected or deleted. The rights of the information subject to request review or discontinuance of handling of his/her personal information may be restricted as per Paragraph 5, Article 34 or Paragraph 2, Article 37 of the Personal Information Protection Act. The information subject cannot request the deletion of his/her personal information when it is clearly stipulated under other statutes that the personal

information is subject to collection. Andaz Seoul Gangnam checks the identity of the information subjects and their agents to verify if the applicants are legitimate when they request the review, correction, deletion, or discontinuance of personal information handling based on their right.

The rights above may be exercised by the legal agent or person entrusted by the information subjects. In such case, the applicant should submit a power of attorney using Annex 11 Form under the Enforcement Rules of the Personal Information Protection Act.

8. PERSONS RESPONSIBLE FOR PERSONAL INFORMATION

The information subjects may ask the personal information manager or the responsible department concerning questions, complaint handling, or remedy of damages arising during their use of the services (or businesses) of Andaz Seoul Gangnam in relation to the protection of their personal information. Andaz Seoul Gangnam will reply to or take actions on their inquiries without delay.

	PERSONAL INFORMATION PROTECTION MANAGER		
Name	Ju Hee Kim	In Young Moon	Su Won Lee
Organization/Position	Chief Accountant	Marketing Communication Assist Director	Information Systems Manager
e-mail address:	juhee.kim@andaz.com	Inyoung.moon@andaz.com	suwon.lee@andaz.com
Contact phone:	02-3442-6348	02-3442-6348	02-3442-6348

9. REMEDIES FOR THE INFRINGEMENT OF RIGHTS AND BENEFITS OF INFORMATION SUBJECTS

The information subjects may request dispute settlement or counseling to the Personal Information Dispute Mediation Committee, Korea Internet Security Agency, and Personal Information Infringement Report Center to seek remedy for the infringement of their personal information. In addition, they may contact the agencies below for reporting or counseling on other infringement on their personal information.

1. Personal Information Dispute Mediation Committee: 1833-6972 (www.kopico.go.kr)
2. Cyber Crime Investigation Division, Supreme Prosecution Office: 1301 (without station code) (<http://www.spo.go.kr>)
3. National Police Agency Cyber Security Bureau: 82 (without station code) (<http://cyberbureau.police.go.kr>)
4. Personal Information Infringement Report Center: 118 (without station code) (<http://privacy.kisa.or.kr>)

Those who suffer infringement of their rights and benefits due to the disposition or nonfeasance by a government agency head against their request as per Article 35 (Review of Personal Information), Article 36 (Correction or Deletion of Personal Information), or Article 37 (Discontinuance of Handling of Personal Information) of the Personal Information Protection Act may file an administrative appeal as per the Administrative Appeal Act.

For further information concerning the administrative appeal, please visit the Legislation Ministry website (<http://www.moleg.go.kr>).

10. MATTERS RELATED TO CHANGES TO THE PERSONAL INFORMATION PROCESSING POLICY

This Personal Information Processing Policy is enforced from the day it is published. When any addition, deletion, or correction is made in the relevant statutes or policies, their cause and details are publicly notified through the announcement of the Andaz Seoul Gangnam website seven days before their enforcement.

DATE ENFORCED: 2019