

PARK HYATT BUSAN PRIVACY POLICY

Park Hyatt Busan (busan.park.hyatt.com), herein referred to as 'Park Hyatt Busan' handles all users' personal information with care, protects the user's personal information security and rights in accordance with the Personal Data Protection Act, and enforces the following Privacy Policy in order to process personal information related complaints by the users.

Park Hyatt Busan uses the Privacy Policy to monitor how the users' personal information is used, and also notifies the user concerning the measures implemented for the protection of personal information. In the case of revising or updating the Privacy Policy, the amendment information will be notified through the announcements board on the website (or individual notification).

*This policy will take effect beginning on September 8th 2016.

1. Personal Information Processing Objective

Park Hyatt Busan handles personal information for the following general purposes. Processed personal information will not be used for purposes other than those specified below. If in any case the purpose of use is revised, the user's consent will be acquired in advance. You may always choose what personal information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected.

A. Provision of Goods or Services

Personal information is received and processed for purposes of hotel Check-in, restaurant use, membership policy management, delivery of goods, service provision, Invoice issuance, contents provision, customized service provision, personal identification verification, age verification, payment of charges, settlement, etc.

B. Use for Marketing and Advertisements

Personal information is collected and processed for purposes of new service (products) development and provision of customized services, provision of event and advertisement information and opportunity for participation, service validity verification, for purposes of understanding access frequency or gathering statistical data concerning service usage by members, etc.

C. Personal Image Information

Personal information is collected and processed for purposes of criminal activity prevention and investigation, facility Safety and fire prevention, etc.

2. Processing and Retention Period

A. List of Personal Information for Processing

The list and objectives of personal information file processing registered/disclosed by Park Hyatt Busan pursuant to Article 32 of the Personal Data Protection Act are listed below.

- Hotel Check-in and Use of Hotel Facilities

Park Hyatt Busan collects minimum required personal information from Hotel guests. There are no restrictions to using the hotel services even if optional fields are not filled in.

- Mandatory field (Collection Consent): Name, contact information, E-mail, nationality

- Optional field (Separate Consent): Gender, home address, date of birth, company name, company telephone number, company address, anniversary date, hobby, marital status, membership number

- Collection method: Written form, website, telephone, FAX, collection from partner companies

- Retention period: 1 year from time of check-out

However, relevant information shall be retained for up to a maximum of 5 years if necessary according to related legislation and internal policies.

- Grounds for retention: Verification of information when a guest returns to the hotel, for payment of charges, or in the event of providing goods, etc.

The following information may be automatically generated and collected during the process of using online services or service provision processing. (Service use records, access log, cookies, access IP information, etc.)

*In regards to hotel check-in, forms required for processing various similar tasks will be processed in the same manner according to the above information.

B. Membership Registration

Park Hyatt Busan collects minimum required information from our hotel guests. There are no restrictions to using the hotel services even if optional fields are not filled in.

Membership Registration	Purpose of utilization	Retention period	Collection method
Restaurant Reservation	Contact or guidance for offering proper service, disclaimer delivery, communication channel for customer complaints handling, guaranteed restaurant reservation, resources for offering customized service	Until the service termination or the period required by related legislation and internal policies	Website, Telephone
Room Reservation	Contact or guidance for offering proper service, disclaimer delivery, communication channel for customer complaints handling, guaranteed room reservation, resources for offering customized service	Until the service termination or the period required by related legislation and internal policies	Website, Telephone
Lumi Spa & Fitness Membership	Identification process, family verification process for membership registration of family members, emergency contact communication channel for customer complaints handling, guidance channel for updated promotion or service	Until the service termination or the period required by related legislation and internal policies	Written Form
Spa Reservation	Identification procedure, guidance channel for updated promotion or service, repeat service	Until the service termination or the period required by related legislation and internal policies	Spa indemnity agreement form, written form of treatment credit program
Room	Secure emergency contact information, membership registration or member management, repeat service.	Until the service termination or the period required by related legislation and internal policies	Room registration card
Event / banquet Reservation	Identification procedure, contact or guidance for service delivery, communication channel for customer complaints handling	Until the service termination or the period required by related legislation and internal policies	Written contract
Event Participation	Contact or guidance for service delivery	Certain period from the date of event termination (additional conditions on event contents)	Event coupon, Safety agreement form

- Grounds for retention: Verification of information in the case of re-registering membership

- The following information may be automatically generated and collected during the process of using online services or service provision processing. (Service use records, access log, cookies, access IP information, etc.)

*In regards to membership card reissue application, membership withdrawal, and other various tasks requiring processing after membership registration, they shall be processed in the same manner according to the above information.

C. Personal Information Processing and Retention Period

Park Hyatt Busan processes/retains personal information within the range of personal information retention/usage period pursuant to related legislation, or personal information retention/usage period agreed upon at the time of collecting personal information from the information holder. Customers' personal information is immediately discarded at the time of personal information collection/provision objective fulfillment.

Processing and retention period for each personal information criteria are listed below. Hotel Guest Information and Hotel Facility Users

Personal information of hotel guests and hotel facility users is retained/used for one year from the date of providing the collection/usage consent for purposes of the usage objective specified above.

- Retention period: 1 year from time of check-out

- Grounds for retention: Verification of information when a guest returns to the hotel, for payment of charges, or in the event of providing goods, etc.

- Exceptional reason: Retention for up to a maximum of 5 years in accordance with related legislation in the case of outstanding payments, etc.

- Related Legislation

- 1) Records concerning consumer complaints or dispute settlement: 3 years
- 2) Records concerning credit information collection/processing and usage: 3 years
- 3) Records concerning payment of charges and provision of goods, etc.: 5 years
- 4) Records concerning contract or subscription withdrawal: 5 years
- 5) Records concerning indication/advertisement: 6 months

Membership registration

Personal information related to membership registration is retained/used for period specified below from the date of providing the collection/usage consent for purposes of the usage objective

3. Personal information collection of children under age of 14

Park Hyatt Busan requests the approval of a legal representative when we collect the personal information of children under the age of 14. With the approval of a legal representative, our company can collect the name and contact information of the children from the legal representative. Collected personal information of the legal representative will be used for the purpose of personal information collection of children only. Collected information of legal representative will be automatically removed in 5 days, if he or she disagrees with the collection of personal information of the children.

4. Matters Concerning Provision of Personal Information to Third Parties

Park Hyatt Busan recognizes provision of personal information to third parties is prohibited, and only permitted if the grounds are applicable to Article 17 and Article 18 of the Personal Data Protection Act, such as securing information holder's approval, special regulations of legislation, etc.

Third parties	Items	Objectives	Periods

5. Matters Concerning Consignment of Personal Information Processing

Park Hyatt Busan consigns personal information processing as shown below for the purpose of ensuring efficient personal information processing.

Consigned Business	Consigned tasks	Period of personal information use
Medallia	Customer satisfaction inquiries	Until membership withdrawal or consignment contract expiry
Oracle Korea	Maintenance of hotel guest management system	
I-Service	Hotel Guest Room cleaning	
Book4Time	Development / maintenance for fitness membership management	
Table Solution	Maintenance for F&B Reservation management system and online booking	

Pursuant to Article 25 of the Personal Data Protection Act, Park Hyatt Busan stipulates matters concerning prohibition of personal information processing for purposes other than consigned task fulfillment, technical/managerial protection measures, re-consignment restrictions, management/supervision of consignee, indemnification for damages, and other obligations on the contract or other such documents. At the same time, internal management protocol “[Attachment 3] Personal Information Processing Consignment (Provision) Contract Security Pledge” will be requested. The consignee is managed, monitored, and supervised on a regular basis to ensure that personal information is processed securely. Also, in the event that the details of the consigned duties or the consignee change, such information will be disclosed immediately through this Privacy Policy.

Current Status for personal information service

Personal Information	Providers	Number of offers	Items of personal information offered	Base of provision	Purpose of provision	Provision Period
N/A						

6. Matters Concerning the Rights-Obligations of Information Holder and the Method of its Exercise

The information holder shall have the right to submit a request for the following information concerning the agreements, such as collection/use and provision of personal information. In this case, please fill out a request form for [Attachment 6] personal information review, correction/deletion, or processing suspension and submit it to the personal information administrator. However, exercise of rights may be restricted if there are obligations defined by legislation.

A. Request to Review Personal Information

Exercise of a right to request to review personal information can be submitted in written form, email, FAX, etc. according to the Personal Data Protection Act Enforcement Regulation Attachment No.8 template. Grand Hyatt Seoul will process the request immediately upon receipt. Request to review personal information can be submitted by a legal representative or other entrusted persons of the information holder.

B. Request Make Correction of Errors

In the case of a request to make correction of errors found in the personal information of the information holder, Park Hyatt Busan does not use or provide the relevant personal information until the corrections are applied.

C. Request for Deletion

In the case of a request to delete personal information of the information holder, Park Hyatt Busan does not use or provide the relevant personal information until deletion is applied.

D. Processing Suspension Request

In the case of a request to suspend processing of personal information of the information holder, Park Hyatt Busan does not process the relevant personal information from the time of receiving the processing suspension request.

7. Personal Information Disposal

As a general rule, Park Hyatt Busan immediately discards personal information upon the fulfillment of the processing objective of the personal information or upon the expiry of the retention period. The procedures, deadline, and method of disposal are listed below.

Sort		Collection Items
On-line dining reservation	Necessary	Name (Korean, English), contact information, email
On-line room reservation	Necessary	Name (Korean, English), contact information, email, address, credit card information
	Optional	Flight information, facilities preference, gold passport number
Sort		Collection Items
Lumi & Spa Fitness membership	Necessary	Personally identifiable information: Name, resident registration number, marital status, name and date of birth of spouse or children, contact information Contact information: email, phone number, main number, direct line
	Optional	Date of birth, home address, name and address of company, job title
	Sensitive(optional)	Medical treatment details for evidence (Restriction for using the center)
Lumi Spa	Necessary	Name, contact information, address, email, date of birth, credit card information at time of on-line reservation
	Optional	Marital status, work phone number, room number
	Sensitive(optional)	Information required before spa treatment. (example: allergy, injury, specific part of body needed for intensivetreatment.) Medical treatment details for skin or health condition before spa treatment.
Guest registration for rooms	Necessary	Name, passport number, contact information, email, nationality
	Optional	Name of company, job title, date of birth, gold passport membership number
Contract for weddings	Necessary	Name, address, contact information (phone number), email
Contract for events/ banquets	Necessary	Name, name of company, contact information (phone number), email
	Optional	Contact information (phone number)
Event participation	Necessary	Name, contact information, email, name and contact information of guardians or parents, room number
	Optional	Information of event participants

A. Disposal Procedure

Information provided by users are saved to a separate DB (separate file for paper documents) for a specified period of time pursuant to internal policies and other related legislation, or it is destroyed immediately. At this point, information saved to a separate DB is not used for any purposes unless in accordance with related legislation.

B. Disposal Deadline

User's personal information is destroyed within 5 days of retention period expiry, or 5 days from the date of acknowledging that use of relevant personal information is unnecessary.

C. Disposal Method

Technical method that restricts regeneration of records is used to destroy personal information saved in electronic document formats. Personal information on paper documents is either shredded or incinerated.

8. Measures to Procure Personal Information Security

Pursuant to Article 29 of the Personal Data Protection Act, Park Hyatt Busan implements the following technical/managerial and physical measures required to procure personal information security.

A. Personal Information Processing Staff Minimization and Training

Personal information management measure is implemented by assigning a minimum number of employees for personal information processing duties under the supervision of an administrator.

B. Scheduled Internal Inspection

In order to procure the stability and security of personal information related duties, internal inspection is conducted on an annual basis.

C. Internal Management Protocol Establishment and Enforcement

Internal management protocol is established and enforced to ensure safe and secure personal information processing.

D. Personal Information Encryption

Passwords among users' personal information are one-way encrypted for storage and management. Password is known only to the user. Additional security features, such as file or transmission data encryption or file lock feature, are applied to important and sensitive data.

E. Technical Prevention Measures for Hacking, etc.

Security Program is installed at Park Hyatt Busan in order to prevent personal information disclosure or damage due to hacking, computer viruses, etc. Also, the program is updated and inspected on a regular basis, the system is installed in a restricted access area, and it is monitored and controlled technically and physically.

F. Restricted Personal Information Access

Measures required for controlled access to personal information are implemented through assignment, modification, and expiry of access permission to personal information processing database system, and Firewall system is used to control and monitor unauthorized access.

G. Access Log Archiving and Falsification Prevention

Personal information processing system access log is archived and managed for a minimum period of 6 months, and security features are applied to prevent falsification, tampering, the, or loss of access logs.

H. Use of Locking Mechanism for Document Security

Documents, external storage mediums, and other such physical elements containing personal information are stored in a safe location with a locking mechanism.

I. Unauthorized Entry Control

A physical location for storing personal information is established, and access and entry control procedures are established and operated.

9. Personal Information Security Officer

Park Hyatt Busan takes responsibility for the general management of personal information processing. Personal Information Security Officers are appointed as shown in the table below to respond to the information holder's complaints and damage relief in regards to personal information processing.

A. Personal Information Security Officer

Exercise of a right to request to review personal information can be submitted in written form, email, FAX, etc. according to the Personal Data Protection Act Enforcement Regulation Attachment No.8 template. Park Hyatt Busan will process the request immediately upon reception.

	Personal Information Security Officer	Personal Information Administrator
Name	Kanhyo Chung	Kiyeon Kim

Affiliation/Position	Director of Finance	Information System Manager
E-mail	kanhyo.chung@hyatt.com	Kiyeon.kim@hyatt.com
Contact	051-990-1270	051-990-1290

The information holder has the right to inquire the personal information security officer or relevant departments concerning any personal information protection related questions, complaints, and damage relief, etc. experienced while using the services (or products) provided by Park Hyatt Busan. Park Hyatt Busan will respond and process all inquiries without delay.

10. Privacy Policy Amendment

This Privacy Policy shall take effect from the date of enforcement. If in any case there are information added, deleted, or corrected pursuant to related legislations and policies, the reasons for amendment and its details, etc. will be notified through the announcements page on Park Hyatt Busan's website 7 days prior to the enforcement of the modified information..

12. Other Personal Information Related Inquiries

The following institutions are external to Park Hyatt Busan. If you are ever dissatisfied with personal information related processing or damage relief results of Park Hyatt Busan, or if you require further assistance, please contact one of the institutions below.

A. Personal Information Infringement Report Center (Managed and operated by Korea Internet and Security Agency)

Exercise of a right to request to review personal information can be submitted in written form, email, FAX, etc. according to the Personal Data Protection Act Enforcement Regulation Attachment No.8 template. Park Hyatt Busan will process the request immediately upon reception.

- Matters under jurisdiction: Personal information infringement reporting, consultation, dispute conciliation, group dispute conciliation
- Website: privacy.kisa.or.kr
- Telephone: 118 (ARS Ext. 2)
- Fax: 02-405-4789
- Address: (138-950) 135 Jungdaero, Songpa-gu, Seoul (Garak-dong 78) IT Venture Tower Personal Information Infringement Report Center / Personal Information Dispute Conciliation Committee

B. Other Related Institutions

- Cybercrime Investigation Department of the Supreme Prosecutors' Office: 02-3480-3573 (www.spo.go.kr)
- Cybercrime Investigation Department of the National Police Agency: 1566-0112 (www.netan.go.kr)

