

## PARK HYATT SEOUL PRIVACY POLICY

Park Hyatt Seoul ([parkhyattseoul.com](http://parkhyattseoul.com), herein referred to as 'Park Hyatt Seoul') 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 Seoul 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 March 9, 2018.

### 1. Personal Information Processing Objective

Park Hyatt Seoul 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.

#### 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.

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.

### 2. Processing and Retention Period

Park Hyatt Seoul 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.

**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

Sort	Purpose of utilization	Retention period	Collection method
Room reservation	Communication channel for customer complaints handling, guaranteed room reservation, offering resources for customized service, and delivering information	Until the service termination or the period required by related legislation and internal policies	Website, telephone
Restaurant reservation	Communication channel for customer complaints handling, offering customized service, and delivering information	Until the service termination or the period required by related legislation and internal policies	Website, telephone
Park Club Membership registration	Identification process, emergency contact, communication channel for customer complaints handling, guidance delivery for updated promotion or services	Until the membership withdrawal or the period required by related legislation and internal policies	Written form
Park Club Spa treatment	Communication channel for customer to deliver updated guidance, provide customized services and handle inquires	Until the service termination or the period required by related legislation and internal policies	Spa indemnity agreement form, telephone
Registration for rooms	Identification procedure, communication channel for customer to deliver updated guidance, discuss contract details and payment, provide customized services and handle inquires	Until the end of contract period or the period required by related legislation and internal policies	Written room registration card
Event/banquet contract	Identification procedure, communication channel for customer to deliver updated guidance, discuss contract details and payment, provide customized services and handle inquires	Until the end of contract period or the period required by related legislation and internal policies	Written contract
Hotel event participation	Contact or guidance for service or event gift delivery	Until the certain period from the date of event termination (additional conditions to be included in event contents)	Event coupon, etc.

### 3. Personal information collection of children under age of 14

Park Hyatt Seoul 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 Seoul 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. At present, we do not provide personal information to third parties.

### 5. Matters Concerning Consignment of Personal Information Processing

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

Consigned business	Consigned tasks	Retention period
Medallia	Customer satisfaction inquiries	Until membership withdrawal or consignment contract expiry
I – Service	Guest room cleaning	
Oracle Korea	Maintenance for hotel guest management system	
Vesper	Maintenance for online dining booking and management system	

Pursuant to Article 25 of the Personal Data Protection Act, Park Hyatt Seoul 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.

### 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. 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. Park 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 to 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 Seoul 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 Seoul 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 Seoul does not process the relevant personal information from the time of receiving the processing suspension request.

**7. Personal Data items**

Park Hyatt Seoul, pursuant to Article 32 of Personal Data Protection Act, can register and release personal information. Objectives and items of personal information are listed below. Information listed below can be collected automatically during the on-line service process or service providing task process. (service records, connection log, IP connection information, internet cookies)

Sort		Collected items
On-line room reservation	Necessary	Name, address, phone number, e-mail, credit card information upon on-line reservation
	Optional	Flight information, facilities preference, World of Hyatt number
On-line restaurant reservation	Necessary	Name (Korean, English), phone number, email
	Optional	Date of birth, address
Park Club membership	Necessary	Name, date of birth, address, phone number, e-mail
Park Club Spa treatment	Necessary	Name, phone number
	Optional	Room number
	Sensitive (optional)	Medical treatment details for evidence (Restriction for using the center)
Registration for rooms	Necessary	Name, passport number, phone number, email, nationality
	Optional	Name of company, job title, date of birth, World of Hyatt number

Events/banquets contract	Necessary	Name, name of company, phone number, email
Wedding contract	Necessary	Name (Korean, English), phone number, email
Event participation	Necessary	Name, phone number, email, room number, name and phone number of guardians or parents if required
	Optional	Information of event participants

\* In case of required documents needed for task handling, such as membership card reissuance or membership withdrawal, Park Hyatt Seoul will handle through the information listed above.

## 8. Personal Information Disposal

As a general rule, Park Hyatt Seoul 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.

### 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.

## 9. Measures to Procure Personal Information Security

Pursuant to Article 29 of the Personal Data Protection Act, Park Hyatt Seoul 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 Seoul 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.

## **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 Seoul's website 7 days prior to the enforcement of the modified information.

## **11. Personal Information Security Officer**

Park Hyatt Seoul 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.

PARK HYATT SEOUL™

	Personal Information Security Officer	Personal Information Administrator
Name	Lee, Jin-wook	Kim, Ki-yeon
Affiliation/Position	Director of Finance	Information System Manager
E-mail	<a href="mailto:jinwook.lee@hyatt.com">jinwook.lee@hyatt.com</a>	<a href="mailto:kiyeon.kim@hyatt.com">kiyeon.kim@hyatt.com</a>
Contract	+82 2 2016 1111	+82 2 2016 1131

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 Seoul. Park Hyatt Seoul will respond and process all inquiries without delay.

## 12. Other Personal Information Related Inquiries

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

### A. Personal Information Infringement Report Center

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 Seoul will process the request immediately upon reception.

- Matters under jurisdiction: Personal information infringement reporting, consultation, dispute conciliation, group dispute conciliation
- Website: <http://privacy.kisa.or.kr>
- Telephone: 118 (ARS Ext. 2)

### B. Other Related Institutions

- Cybercrime Investigation Department of the Supreme Prosecutors' Office: 1301 / cid@spo.go.kr (<http://spo.go.kr>)
- Cyber Bureau of Korea National Police Agency: 182 (<http://cyberbureau.police.go.kr>)