



## PRIVACY POLICY

### Personal Data Collection

SC Park Hotel collects your information to operate effectively and provide you with the best experiences with our services. The specific kind of information collected will depend on the context of your interactions with SC Park Hotel, and the services you use. The following are examples of the information that may be collected:

- Contact information (such as name, email address, mailing address, and phone number);
- Payment information (including payment card numbers, billing address, and bank account information);
- Demographic data (such as age, gender, country, and preferred language);
- Information related to your reservation, stay, or visit to a property (including the SC Park Hotel where you have stayed, date of arrival and departure, and goods and services purchased);
- Information necessary to fulfill your special requests and/or specific accommodations;
- Loyalty program member information, online account details, profile or password details and any frequent flyer or travel partner program affiliation;
- Copies of your correspondence if you contact us;
- Your interests and preferences;
- Information collected through the use of closed-circuit television systems, card key and other security systems.
- Information related to your use and interaction with our website.

There may be instances in which the personal information that you provide to us or that we collect is considered sensitive personal information under the privacy laws of some jurisdictions (e.g. food allergies, medical conditions, biometric information, credit card information, location data depending on the definition of sensitive personal information under the relevant jurisdiction). We only process sensitive personal information in your jurisdiction if and to the extent permitted or required by applicable law (e.g. so that we can ensure we tailor our services to you accordingly in terms of food allergies and medical conditions, to ensure we can process card payments).

## Methods of Information Collection

- **Information You Give Us:** We receive and store information you enter on our website or give us in any other way, including, for example, when you stay as a guest at hotels managed by us. You decide how much information to share with us in most cases, but not sharing required information may limit your ability to engage in certain activities, such as payment information required to complete your reservation. If you submit any personal information relating to another person (e.g., if you make a reservation for another individual), you represent that you are authorised by that person to do so and to permit us to use the information in accordance with this Privacy Policy. You also represent that the information you provide is accurate.

- **Automatic Information:** When you use or interact with our website and/or use any apps that we may make available on our website, we receive and store information generated by your activity and information automatically collected from your browser or mobile device. For example, like many websites, we obtain certain information when your web browser accesses our website including your IP address, browser type, operating system, mobile network data, pages viewed and access times. This information helps us to communicate with our customers and better understand them.

- **Security Systems:** When you visit our managed properties, information may be collected about you through such properties' closed circuit television systems, electronic key cards and other security systems.

- **Information from Other Sources:** We may receive information about you from other sources, such as public databases, joint marketing partners, and other third parties. This may include information from your travel agent, airline, credit card, and other partners.

- **Age Limitations:** SC Park Hotel does not knowingly collect personally identifiable information from our websites from any person under the age of 18. SC Park Hotel may collect personally identifiable information from people under the age of 18 as part of the guest registration process, but always with the consent of such person's parent or guardian.

## Purpose of Collected Data

SC Park Hotel collects your information to operate effectively and provide you with the best experiences with our services. SC Park Hotel may collect, use, and disclose the information it collects for a variety of reasons, including for the following purposes:

- **Fulfillment of Reservation and Other Purchases:** We may process information relating to transactions that you enter into with us and/or through our website ("transaction data"). The transaction data may be processed for the purpose of completing your room reservation, supplying the purchased goods and services, customizing our services to your preferences,

seeking your feedback on your stay at our properties, and keeping proper records of those transactions.

- **Membership Programs:** To administer and operate voluntary membership programs, including loyalty programs and frequent flyer programs. The data may be processed for the purposes of recording stay and transactional data, earning and redeeming rewards, points, or credits in connection with the programs.

- **Response to Inquiries:** We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. The correspondence data may be processed for the purposes of communicating with you and record-keeping.

- **Internal Business Purposes:** For our internal business purposes, such as data analysis, audits, developing new products, enhancing the website, improving our services, identifying usage trends and visiting patterns, determining the effectiveness of our promotions, and meeting contractual obligations.

- **Marketing and Promotions:** To communicate news and promotions to you relating to SC Park Hotel-related products and services and other products and services we think may be of interest to you.

- **Safety and Security:** To maintain your safety and security as well as that of other guests and personnel, while you visit our managed hotels and residences.

- **Our Legal Duties:** To comply with legal and regulatory requirements or demands in accordance with applicable law, a court order, subpoena, or other legal process.

- **Additional Uses:** We may also use your data in other ways as described to you when you provide such information to us.

This privacy policy will be subject to change from time to time. Your use of this website constitutes your acceptance of the current terms as set out in this privacy policy.

### **Cookie Policy**

We use tracking tools like browser cookies and web beacons to collect information from you. We collect information about users over time when you use this website or any apps that we may make available on our website. We may have third parties collect personal information this way. Learn more about these tools and how you can control them [here](#).

### **Sharing Information**

It is essential that we share information with other parties in order to provide you with and to maintain the best possible service. The specific kind of information we share will depend on the

context of your interactions with SC Park Hotel, and the services you use. Accordingly, your personal information may be shared with the following parties insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy:

- To any affiliates of SC Park Hotel and other organisations which own the hotels managed by us; to the representative or travel advisor that has supplied us with your personal information (for example, your travel agent, personal assistant, employer, or spouse who has provided us with your details). The name and contact details of such representative or travel advisor will differ on a case-by-case basis. Please contact your representative or travel advisor for any questions relating to the processing of your personal information by such representative or travel advisor;
- To third parties not affiliated with SC Park Hotel when we have your consent to do so;
- To our trusted business partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures;
- To our marketing and advertisement partners to provide you with more-relevant ads on our site and to encourage you to return to our site;
- To third-party service providers (such as Facebook or Google) to (i) provide us with analytics so we can evaluate and improve our products and services, (ii) to help us identify existing and potential guests and customers similar to our audience, and (iii) help us to segment and understand our audience by providing additional information so that we can send the most relevant and targeted communications possible;
- To organisations which own, manage or operate the spas, restaurants, health clubs, and other outlets at our properties so they can provide with their services;
- To third parties not affiliated with SC Park Hotel if we have a good-faith belief that it is reasonably necessary to: (1) meet any applicable law, regulation, legal process or enforceable governmental request; (2) enforce applicable terms of service, including investigation of potential violations; (3) detect, prevent, or otherwise address fraud, security or technical issues; and (4) protect against harm to the rights, property or safety of SC Park Hotel, our users or the public as required or permitted by law; and
- To any third parties to the extent necessary with respect to a sale of all or part of our business operations or assets.

### **Overseas Information Transferring**

It is essential that we share information across multiple jurisdictions in order to provide you with and to maintain the best possible services. By using and/or purchasing our goods and services, we may transfer your personal information across multiple jurisdictions. Accordingly, insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy, we may transfer and store your personal information in such other countries and territories

where our third-party service providers, advisors, partners and consultants are located, which changes from time to time.

Such transfers may be to a country or territory which may not provide the same level of privacy protection as that provided by the country or territory in which the information was collected, but we will take reasonable steps (such as entering into data transfer agreements based on the European Commission model clauses or clauses approved by other major regulators) to ensure that while your personal information is within our control, we will handle your personal information using reasonable security and confidentiality procedures to keep your personal information secure and confidential.

### **Information Security**

We implement reasonable administrative, organisational, and technical safeguards and security measures to protect personal information within our control from unauthorized access, acquisition, disclosure, destruction or alteration, accidental loss, misuse, or damage. We regularly review and monitor such safeguards and security measures.

### **Retention of Information**

To the extent permissible by applicable law, we will retain your personal information for such period as necessary to satisfy or to fulfill the following:

- The purposes for which that personal information was provided,
- An identifiable and ongoing business need, including record keeping,
- A specific legal or regulatory requirement, and/or
- A requirement to retain records that may be relevant to any notified regulatory investigations or active legal proceedings.

Where there is no sufficient justification to retain such personal information, such personal information will be safely and securely deleted, disposed of, anonymised and/or, where permitted by applicable law, blocked.

### **Reach Out for Information**

Our Data Protection Officer will be happy to answer any concerns or queries you may have relating to the use or storage of your personal data. Your principal rights (depending on applicable law) include:

- (a) the right to access;

- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority;
- (h) request that the rules on processing of your personal information are explained; and
- (i) the right to withdraw consent.

### **Third-party Website Link**

The linking of third-party websites to our website, [www.scparkhotel.com](http://www.scparkhotel.com), does not indicate any association with or endorsement by SC Park Hotel. SC Park Hotel does not assume responsibility or liability of any nature whatsoever for the activities conducted or information contained in the third-party websites.

### **Notice of Privacy Policy**

This privacy policy will be subject to change from time to time. The effective date of this current privacy policy is set out at the end of this document. Your use of this website constitutes your acceptance of the current terms as set out in this privacy policy.

**Effective Date: 31 January 2025**