

[Attachment 4]

PRIVACY POLICY

KAL Hotel Network Co., Ltd. (Grand Hyatt Incheon) (<http://www.incheon.grand.hyatt.kr/>, herein referred to as 'Grand Hyatt Incheon) handles the user's 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 of the users.

Grand Hyatt Incheon 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 April 4th of 2016.

1. Personal Information Processing Objective

Grand Hyatt Incheon 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 issue, 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 (product) 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 objective of personal information file processing registered/disclosed by Grand Hyatt Incheon pursuant to Article 32 of the Personal Data Protection Act are listed below.

· Hotel Check-in and Use of Hotel Facilities

Grand Hyatt Incheon 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 legislations 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.

· Membership Registration

Grand Hyatt Incheon 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.

- Legal fields (Consent not required): Name, Resident Registration Number
(Tourism Promotion Act Article 28)
- Mandatory fields (Collection consent): Telephone number, e-mail, address
- Optional fields (Separate consent): Gender, home address, date of birth, company name, position, company telephone number, anniversary date, hobby, marital status
- Collection method: Written form, website, telephone, FAX, collection from partner companies
- Retention period: 3 years from date of membership withdrawal. However, relevant information shall be retained for up to a maximum of 5 years if necessary according to related legislations and internal policies.
- 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 task requiring processing after membership registration, it shall be processed in the same manner according to the above information.

B. Personal Information Processing and Retention Period

Grand Hyatt Incheon processes/retain personal information within the range of personal information retention/usage period pursuant to related legislations, 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 legislations in the case of outstanding payments, etc.
- Related Legislations
 - 1) Records concerning consumer complaint 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

3. Matters Concerning Provision of Personal Information to Third Parties

“Grand Hyatt Incheon recognizes provision of personal information to third parties only if the grounds are applicable to Article 17 and Article 18 of the Personal Data Protection Act, such as information holder’s approval, special regulations of legislations, etc. At the present point, we do not provide personal information to third parties.”

4. Matters Concerning Consignment of Personal Information Processing

Grand Hyatt Incheon consigns personal information processing as shown below for purposes of ensuring efficient personal information processing.

Consigned Business	Consigned tasks	List of personal information for consignment	Period of personal information use
Medallia	Customer satisfaction inquiry	Name, contact information, email, address, nationality, check-in date, hotel charges, membership number, and all other personal information collected	Until membership withdrawal or consignment contract expiry
Experian	Online restaurant booking	Name, email, contact information, and personal information collected at the time of online restaurant booking	
Cheetah Mail	Email transmission ASP service	Name, email	
STAR MARK	Advertisement and marketing	Name, contact information, membership number, email, address	
Spoqa	Point accumulation and coupon text transmission system support	Name, gender, contact information, point status	

Pursuant to Article 25 of the Personal Data Protection Act, Grand Hyatt Incheon 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.

5. 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 in legislations.

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 Incheon will process the request immediately upon reception.

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 requesting to make correction of errors found in the personal information of the information holder, Grand Hyatt Incheon does not use or provide the relevant personal information until the corrections are applied.

C. Request for Deletion

In the case of requesting to delete personal information of the information holder, Grand Hyatt Incheon does not use or provide the relevant personal information until deletion is applied.

D. Processing Suspension Request

In the case of requesting to suspend processing of personal information of the information holder, Grand Hyatt Incheon does not process the relevant personal information from the time of receiving the processing suspension request.

6. Personal Information Disposal

As a general rule, Grand Hyatt Incheon 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 legislations, 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 legislations.

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.

7. Personal Information Security Officer

Grand Hyatt Incheon 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. Grand Hyatt Incheon will process the request immediately upon reception.

	Personal Information Security Officer	Personal Information Administrator
Name	Adam Myott	Su Jin Oh
Affiliation/Position	Executive Office / General Manager	Human Resources Dept. / Assistant Administrator
Contact	032-745-1234	032 745 1102
E-mail	Adam.myott@hyatt.com	Suzie.oh@hyatt.com

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 Grand Hyatt Incheon. Grand Hyatt Incheon will respond and process your inquiries without delay.

8. Measures to Procure Personal Information Security

Pursuant to Article 29 of the Personal Data Protection Act, Grand Hyatt Incheon 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 Grand Hyatt Incheon 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, theft, 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. Other Personal Information Related Inquiries

The following institutions are non-relevant to Grand Hyatt Incheon. If you are ever dissatisfied with personal information related discontentment processing or damage relief results of Grand Hyatt Incheon, 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)

- Matters under jurisdiction: Personal information infringement reporting, consultation, dispute conciliation, group dispute conciliation

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 Grand Hyatt Incheon 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, theft, 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. Other Personal Information Related Inquiries

The following institutions are non-relevant to Grand Hyatt Incheon. If you are ever dissatisfied with personal information related discontentment processing or damage relief results of Grand Hyatt Incheon, 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)

- 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)

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 Grand Hyatt Incheon's website 7 days prior to the enforcement of the modified information.

Privacy Policy Version Number: 1.1

Date of announcement: April 4th, 2016 / Enforcement date: April 4th, 2016