



Banyan Tree

GDPR Addendum

Version: 1.0
Date: 8th March 2018
Status: Finalised

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1 INTRODUCTION

1.1 DOCUMENT PURPOSE

The purpose of this document is to state the basic procedures that we are adopting in relation to data privacy and protection. These procedures are focused on the privacy rights in and around data shared on our hotel systems, digital systems and B2B marketing systems. Banyan Tree Holdings and its direct and indirect subsidiaries (including Banyan Tree Hotels & Resorts ("BTHR")) are committed to the fullest protection and respect for the privacy of our customers.

1.2 DOCUMENT APPROVAL

Name	Title	Department
Des Pugson	Managing Director	BTHR
Eddy See	Group Managing Director	BTHR
Alex Liam	Legal Counsel	BTHR

2 BANYAN TREE GROUP'S COMMITMENT

2.1 OVERVIEW OF DATA PRIVACY

Banyan Tree Hotels & Resorts adheres to relevant laws and regulations pertaining to the data privacy of our customers. In line with this adherence, formal procedures have been set out in this Statement for customer data protection.

2.2 CONSENT

Banyan Tree Hotels & Resorts has various websites, distribution, marketing and IT systems that are part of the ecosystem for hotels to service our customers.

Each system has a customer consent section before the data is collected and utilized for the identification of guests in the course of the consumption of hotel services.

2.3 WHERE DATA IS PROCESSED

Data is processed in various entities

- owned, franchised and managed hotels by the Banyan Tree Group
- Banyan Tree brand websites including www.banyantree.com, www.angšana.com, www.cassia.com and www.dhawa.com
- Banyan Tree travel partners website example www.expedia.com, www.ctrip.com, etc
- Banyan Tree Central Reservations System – call centres

2.4 WHAT PERSONAL DATA IS COLLECTED

For handling and servicing customer's request, Banyan Tree is obliged to ask you information about you and/or your family details such as:

- Contact details (for example, last name, first name, telephone number, email)
- Personal information (for example, date of birth, country of residence)
- Information relating to your children (for example, first name, date of birth, age)
- Your credit card number (for transaction and reservation purposes)
- Your membership number for the Banyan Tree Hotels loyalty program or another partner program (for example, the airline loyalty programs)
- Your arrival and departure dates
- Your preferences and interests (for example, smoking or non-smoking room, preferred floor, type of bedding, type of newspapers/magazines, sports, cultural interests)
- Your questions/comments, during or following a stay in one of our establishments.

We do not deliberately collect sensitive information and will only do so if absolutely necessary and with your prior consent. Such information includes (but not limited to) information concerning race, ethnicity, political opinions, religious and philosophical beliefs, union membership, or details of personal health.

2.5 WHEN IS YOUR PERSONAL DATA COLLECTED

Banyan Tree Holdings (including all direct subsidiaries, indirect subsidiaries and affiliates of Banyan Tree Holdings which would include Banyan Tree Hotels & Resorts), may collect, hold and use information you share with us in order to provide our hotel services and products to you, including (without limitation) enabling you to make, and us to accept, reservations online for our hotels worldwide (Hotels). By using our websites, call/phone services, reservations systems, marketing and supporting IT systems you expressly consent to us processing your information for the purposes for which this information was collected and contacting you by SMS, email, telephone or any other electronic means where applicable.

For handling and servicing customer's request, Banyan Tree Hotels & Resorts collects your personal data on a variety of occasions:

- Hotel Service Activities
 - o Reservations and pre-arrival information
 - o Booking, cancelling, modifying a room reservation
 - o During check-in process via registration card and/or business card
 - o During check-out process to settle the bills
 - o Request fulfilments and reservations at Spa/Restaurants
 - o Handling service requests, complaints and/or disputes.
 - o Any additional sales, Food & Beverage or catering services
- Participation in Marketing program
 - o Signing up of newsletters
 - o Signing up for online promotion to receive offers and promotions via email or any relevant promotions via other communication channels (SMS, Wechat, Whatsapp etc.)
 - o Participation on our guest satisfaction surveys whether directly or through third parties
- Transmission of information to third party systems
 - o Big List Tour operators, travel agents, GDS systems, reservation systems, and others
- Website and Internet activities
 - o Connection to Banyan Tree Hotels & Resorts websites (IP Address, cookies)
 - o Online forms
 - Online reservations
 - Questionnaires
 - Banyan Tree hotels information pages
 - Relevant social network engagement

2.6 WHAT PURPOSES YOUR PERSONAL DATA ARE COLLECTED FOR

For handling and servicing customer's request, Banyan Tree Hotels & Resorts collects your personal data for the following purposes:

- Meeting our obligations to our customers.
- Managing the reservation of rooms and accommodation requests:
 - o Creation and storage of legal documents in compliance with accounting standards.
- Managing your stay at the hotel:
 - o Managing access to relevant services (telephone, bar, pay TV etc.)
 - o Managing access to rooms

- Internal management of lists of customers having behaved inappropriately during their stay at the hotel (aggressive and anti-social behavior, non-compliance with the hotel contract, non-compliance with safety regulations, theft, damage and vandalism, or payment incidents).
- Improving our hotel service, especially:
 - Processing your personal data in our customer marketing program in order to carry out marketing operations, promote brands and gain a better understanding of your requirements and wishes
 - Adapting our products and services to better meet your requirements
 - Customizing commercial offers and the promotional messages we send to you
 - Informing you of relevant special offers and any new services created by Banyan Tree Group or one of its subsidiaries.
- Managing our relationship with customers before, during and after your stay:
 - Managing the loyalty program
 - Providing details for the customer database
 - Segmentation operations based on reservation history and customer travel preferences with a view to sending targeted communications
 - Predicting and anticipating future behaviors
 - Developing statistics and commercial scores, and carrying out reporting
 - Providing context data for the offer push tool when a customer visits a Group website or makes a reservation
 - Knowing and managing the preferences of new or repeat customers
 - Sending you newsletters, promotions and tourist, hotel or service offers, or offers from Banyan Tree Group partners, or contacting you by telephone if applicable
 - Managing requests to unsubscribe from newsletters, promotions, tourist offers and satisfaction surveys
 - Using a dedicated telephone service to search for persons staying in Banyan Tree Hotels Group hotels in the event of serious events affecting the hotel in question (natural disasters, terrorist attacks etc.).
- Use a trusted third party to cross-check, analyze and apply certain devices to your collected data at the time of booking or at the time of your stay, in order to determine your interests and your customer profile, and to allow us to send you personalized offers that are customized for your preferences
- Improving Banyan Tree Hotels & Resorts services, especially:
 - Carrying out surveys and analyses of questionnaires and customer comments
 - Managing claims/complaints
 - Offering you the benefits of our loyalty program.
- Securing and enhancing your use of Banyan Tree Group websites, especially:
 - Improving navigation speed
 - Implementing security and fraud prevention.
- Conforming to local legislation (for example, storing of accounting documents).

2.7 DATA SECURITY

Banyan Tree Hotels & Resorts takes appropriate technical and organizational measures, in accordance with applicable legal provisions, to protect your personal data against illicit or accidental destruction, accidental alteration or loss, and unauthorized access or disclosure. To this end, we have taken technical measures (such as firewalls) and organizational measures (such as user ID/password systems, means of physical protection etc.). Internal and external IT Risk Management and Audit teams work on annual reviews, best practices,

enforcing company security policies and audit checklist program to identify gaps and support IT Policy governance.

When you submit credit card data when making a reservation, SSL (Secure Socket Layer) encryption technology is used to guarantee a secure transaction.

2.8 DATA COOKIES (MAINLY ARISING UPON WEBSITE VISITS)

2.8.1 What is a cookie?

Cookies and other similar tracers are packets of data used by servers to send status information to a user's browser and return status information to the original server through this same browser.

The status information can be a session identifier, a language, an expiration date, a response field or other types of information.

These tracers may be installed on your device depending on the preferences that you expressed or may express at any time in accordance with this policy.

During their validity period, cookies are used to store status information when a browser accesses various pages of a website or when the browser returns to this website at a later point.

There are different types of cookies:

Session cookies, which are deleted as soon as you exit the browser or leave the website

Persistent cookies, which remain on your device until their expiration or until you delete them using the features of your browser

2.8.2 Why have a cookies policy?

With a view to providing more relevant information and ensuring transparency, Banyan Tree Hotels & Resorts aims to assist you in learning more about the following:

The origin and purpose of the information processed when you browse Banyan Tree Hotels & Resorts websites

Your rights with regard to cookies and other tracers used by Banyan Tree Hotels & Resorts

2.8.3 Why use cookies?

We use cookies and other tracers primarily for the following purposes:

Cookies strictly necessary for browsing the Banyan Tree Hotels & Resorts websites and the ability to use all of their features, and intended in particular to:

Manage authentication of website visitors and the associated security measures, and ensure proper functioning of the authentication module

Optimize the user experience and facilitate browsing, in particular determining "technical routes" for browsing

Store information regarding the "cookies" information banner seen by website visitors who then continue to browse the website after agreeing to accept cookies on their device

Implement security measures (for example, when you are asked to log in again for content or a service after a certain period of time, or to ensure basic operation of Banyan Tree Hotels Websites and use of their major technical features, such as monitoring of performance and browsing errors, management of user sessions, etc.)

Cookies for features intended in particular to:

Adapt Banyan Tree Hotels & Resorts websites to the display preferences of your device (language, currency, display resolution, operating system used, configuration and settings of the display of web pages based on the device you are using and its location, etc.)

Store specific information that you enter on Banyan Tree Hotels Websites in order to facilitate and customize your subsequent visits (including displaying the visitor's first and last names if the visitor has a user account)

Allow you to access your personal pages more quickly by storing the login details or information that you previously entered

Cookies for visitor tracking are aimed at improving the comfort of users by helping us understand your interactions with Banyan Tree Hotels & Resorts websites (most visited pages, applications used, etc.); these cookies may collect statistics or test different ways of displaying information in order to improve the relevance and usability of our services.

Advertising cookies are intended to (i) offer you, in advertising spaces, relevant, targeted content that may be of interest to you (best offers, other destinations, etc.) based on your interests, browsing behavior, preferences, and other factors, and (ii) reduce the number of times that the advertisements appear.

Affiliate cookies identify the third-party website that redirected a visitor to Banyan Tree Hotels & Resorts websites.

Social network cookies, set by third parties, allow you to share your opinion about and content from Banyan Tree Hotels & Resorts websites on social networks (for example, the "Share" or "Like" application buttons for social networks).

The social network applications on Banyan Tree Hotels & Resorts websites as mentioned above can in some cases allow the social networks concerned to identify you even if you did not click on the application button. This type of button can allow a social network to track your browsing on Banyan Tree Hotels & Resorts websites, simply because your account in the social network concerned is enabled on your device (open session) while you are browsing.

We recommend that you read the policies of these social networks to familiarize yourself with how they use the browsing information they may collect, especially with regard to advertising. These policies must specifically allow you to make choices on these social networks, particularly by configuring your user accounts for each of them.

2.8.4 Consent

The installation of certain cookies is subject to your consent. Also, when you first visit the relevant Banyan Tree Hotels & Resorts website, you are asked whether you agree to the installation of this type of cookie, which is only activated after your acceptance.

This process is supported by means of an information banner and prompt on the home page of the Banyan Tree Hotels & Resorts website, which informs you that by continuing to browse, you are consenting to the installation of cookies on your device.

You can change your mind at any time using the various methods described in section "Deleting and/or blocking cookies".

2.8.5 Deleting and/or blocking cookies

You have several options for deleting cookies and other tracers.

Browser settings

Although most browsers are set by default to accept cookies, you can, if you desire, choose to accept all cookies, always block cookies, or choose which cookies to accept based on their senders.

You can also set your browser to accept or block cookies on a case-by-case basis before they are installed. Your browser also allows you to regularly delete cookies from your device. Remember to configure all the browsers in your different devices (tablets, smartphones, computers, etc.).

Regarding management of cookies and your preferences, configuration varies for each browser. This is described in the Help menu of your browser, as well as how to edit your preferences with regard to cookies. For example:

- For Internet Explorer™: <http://windows.microsoft.com/en-US/windows-vista/Block-or-allow-cookies>
- For Safari™: <http://www.apple.com/legal/privacy/en-ww/cookies>
- For Chrome™:
<http://support.google.com/chrome/bin/answer.py?hl=en&hlrm=en&answer=95647>
- For Firefox™: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- For Opera™: <http://help.opera.com/Windows/10.20/en/cookies.html>

Saving a cookie to your device depends on your wishes, which you can exercise and change at any time and free of charge using the settings offered by your browser software.

If your browser is set to accept cookies on your device, the cookies embedded in the pages and content that you view may be temporarily stored in a dedicated space on your device. They can only be read by their issuer.

However, you can set your browser to block cookies. Keep in mind that if you set your browser to block cookies, some features, pages and spaces on Banyan Tree Hotels Websites will not be accessible, and we cannot be held responsible for such access issues.

2.8.6 Specialized advertising platforms

Several professional advertising platforms also give you the option to accept or block cookies used by companies that are members. These centralized mechanisms do not block the display of ads; they simply prevent the installation of cookies that tailor ads to your interests.

For example, you can visit the website <http://www.youonlinechoices.com> to prohibit the installation of these cookies on your device. This website is offered by digital advertising professionals brought together within the European Digital Advertising Alliance (EDAA) and managed in France by Interactive Advertising Bureau France.

When you submit credit card data when making a reservation, SSL (Secure Socket Layer) encryption technology is used to guarantee a secure transaction.

2.9 DATA COOKIES

You have the right to access your personal data collected by Banyan Tree Hotels & Resorts and to modify it subject to applicable legal provisions.

You may also exercise your right to object by writing to the address below.

In the event of difficulty exercising your rights, please contact the Data Privacy department for the Banyan Tree Hotels Group directly by sending an email to data.privacy@banyantree.com or by writing to the address below:

Data Protection Officer

Risk Department, Group Control Services

211 Upper Bukit Timah Road

Singapore 588182

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request. You will be asked to include a copy of an official piece of identification, such as a driver's license or passport, along with your request.

If your personal data is inaccurate, incomplete or not up to date, please send the appropriate amendments to the Data Privacy department as indicated above.

All requests will receive a response as swiftly as possible and in accordance with applicable law.

You may also exercise your rights in respect of your personal data that is stored and processed by a hotel following a stay. To do this, you must contact the hotel directly.

2.10 YOUR RIGHTS

- We will take reasonable steps to ensure the accuracy and completeness of any personal information we hold about you.
- You can ask us not to process your personal information for marketing purposes. We will usually inform you (before collecting your information) if we intend to use, or disclose your information to any third party, for such purposes.
- You may request access to, or the correction of, your personal information we hold by contacting us at data.privacy@banyantree.com Further, if you have previously opted into a communication or marketing preference, through the booking or registration process or otherwise, those preferences will continue to apply unless you wish to opt-out and notify us accordingly via email at data.privacy@banyantree.com

- We note that additional privacy policies may also apply in certain circumstances, e.g. where you have agreed to our Guests Terms and Conditions, Other Terms and Conditions, or where you have entered into another contract with us or any other Group member. Any additional consents you provide through other channels (e.g. guest registration cards at a Hotel) will apply.
- To enable us to process your requests promptly, please provide full details of the particular information you seek and documentary evidence of your identity. Any access request may be subject to a fee to meet our reasonable costs in providing you with details of the information we hold about you.
- We only retain your personal information for as long as is reasonably necessary in the circumstances to enable us to fulfil the purposes outlined in this Policy, subject to applicable law.

2.11 DATA PROTECTION OFFICER

Banyan Tree has a dedicated system of accountability to handle such data privacy queries, you may wish to reach out to:

Data Protection Officer
Risk Management, Group Control Services
Banyan Tree Hotels & Resorts
data.privacy@banyantree.com