



FOUR SEASONS HOTELS BOGOTÁ
PERSONAL DATA TREATMENT POLICY
HOTELES CHARLESTON BOGOTÁ S.A.S.

1. Introduction:

According to Law 1581, 2012 and Decree 1377, 2013 and other applicable norms in relation to protection of personal data, this document defines the requirements for the management and protection of processed personal information or under custody of Hoteles Charleston Bogotá S.A.S (from now on "Hoteles Charleston Bogotá SAS" or "the company").

This policy is applicable to all databases of Hoteles Charleston Bogotá SAS and must be followed by the company's personnel and/or contractors that manage personal data on behalf of the company.

2. Identification of the responsible of the management:

Hoteles Charleston Bogotá S.A.S. is a company duly constituted according to the Colombian Law, identified with NIT 900798269-3, with address Calle 69A # 6-21 of the city of Bogotá and with phone number 325 7900.

3. **Basic Concepts:**

For an adequate comprehension of this policy, some definitions must be considered:

- a. **Authorization:** Previous consent expressed and informed by the holder to process personal data;
- b. **Data Base:** Organized set of personal information to be treated;
- c. **Personal Data:** any information related to or that can be associated to one or several certain legal persons or ascertainable persons;
- d. **Private Data:** Information that due to its private or reserved nature is relevant to the holder;
- e. **Public Data:** Is the information that is not semi-private, private or sensible. Among others, public data is considered: information related to people's civil state, profession or occupation and the type of merchant or public server. By its nature, public data may be contained among others in public registries, public documents, gazettes, public newsletters, court rulings, duly enforced that are not subject of reserve;
- f. **Sensible Data:** Those that affect the privacy of the holder due to inappropriate use that may cause discrimination, such as those revealing racial or ethnic origin, political orientation, religious or philosophical convictions, affiliation to unions, social organizations, or human rights organizations that promote interests of any political party or that guarantee the rights and warranties of opposition parties, and also information related to health, sexual life and biometric data;
- g. **Treatment Officer:** Legal, judicial, public or private person that individually or in association with others treats personal data for the data treatment person;
- h. **Treatment Responsible person:** Legal, judicial, public of private person that individually or in association with others decides about the database and/or the treatment of the information;

- i. **Transmission:** treatment of personal data that implies the communication of the same in or out of the territory of the Republic of Colombia, when the object of such is the performance of a treatment by the treatment officer in behalf of the responsible person;
- j. **Transfer:** Data transfer occurs when the responsible person or the treatment officer, located in Colombia, sends the information of personal data to a receiver, whom at the same time, is responsible for the treatment, and is located in or out of the country;
- k. **Treatment:** Any operation or set of operations about personal data, such as recollection, storage, use, circulation, or suppression;
- l. **Holder:** person whose personal data is being treated;

4. Principles for the Treatment of Personal Data:

Personal data to be treated by Hoteles Charleston Bogotá SAS should always comply with the following principles:

- a. **Freedom Principle:** Unless there is a contrary legal norm, the recollection of data can only be made with prior authorization, written consent and informed by the holder. Personal data can't be obtained or disclosed without previous consent by the holder, or without a legal or judicial order that relieves the consent. No misleading or fraudulent means to recollect or treat personal data can be used.
- b. **Principle of Limitation of Recollection:** Only strictly necessary personal data should be recollected for the compliance of the treatment purpose; in such a way that the data registry or the disclosure not closely related to the objective is prohibited.
- c. **Purpose Principle:** Treatment must obey a legitimate purpose in accordance to the Constitution and the Law, which must be informed to the holder. This information must be prior, clear and sufficient about the purpose of the information offered and therefore data without a specific purpose must not be collected.
- d. **Temporariness Principle:** Personal data will be stored only for the reasonable and necessary time to comply with the treatment purpose and the legal requirements of monitoring and control authorities or other competent authorities. Data will be stored when necessary for the compliance of a legal or contractual obligation. To define the treatment term, applicable norms for each purpose will be considered as well as the administrative, accounting, tax, legal and historical information. Once the purposes have been met, data will be deleted, and this should be done in such a way that it cannot be retrieved or copied through other means.
- e. **Principle of No Discrimination:** Any act of discrimination is prohibited through the information collected in the database or files.
- f. **Principle of Truthfulness of Quality:** The information to be treated must be truthful, complete, verifiable, and comprehensible. Partial, incomplete, fractioned or misleading information is prohibited for treatment.
- g. **Principle of Safety:** Every person related to the company must comply with the technical, human, and administrative norms established by the entity to grant safety to personal data, avoiding data adulteration, loss, consultation, not authorized or fraudulent use or access.
- h. **Transparency Principle:** In the treatment, the holder's right to obtain at any time and with no restriction information of his personal data must be guaranteed.
- i. **Restricted access Principle:** Access to personal data will be allowed only to the following:

- Data holder;
- Authorized people by data holder;
- Authorized staff within the company;
- Authorized people through legal or judicial order to know the information about the data holder.

j. **Principle of restricted circulation:** Personal data can only be sent to the following people:

- Data holder;
- Authorized people by data holder;
- Authorized staff within the company;
- Authorized people through legal or judicial order to know the information about the data holder.

k. **Confidentiality Principle:** Everybody involved in personal data treatment is obliged to guarantee confidentiality and secrecy of information, even after finalizing the relationship with the work related to the treatment, being able only to release or communicate personal data when this corresponds to the activities authorized by law.

5. Personal Data that can be recollected:

Hoteles Charleston Bogota SAS may collect personal data belonging to the following categories:

- a. ID general personal data such as: names, surnames, ID, ID number, civil state, sex.
- b. Specific personal ID data such as: signature, nationality, family information, electronic signature, other id documents, place and date of birth, age.
- c. Financial, credit and/or socio-economic data.
- d. Biometric Data such as: image, digital fingerprint.
- e. Location information related to professional or private activity such as: address, phone number, email,
- f. Health related personal data and affiliations to Social Security Integral System.
- g. Data related to work history, educational level, and/or judicial and/or disciplinary history.

6. Purposes and reach of treatment

Hoteles Charleston Bogotá SAS can perform personal data treatment with the following purposes:

CATEGORY	PURPOSES
CANDIDATES	<ul style="list-style-type: none"> - Development of the company’s social object. - Obtaining financial, accounting, statistic, and/or historic records. - Decision making on personnel recruiting and selection. - To keep individual dossiers of the candidates - Academic, labor and personal reference verification. - Compliance of legal requirements by competent authorities in exercise of their legal functions. - To handle paperwork, applications, complaints and claims. - Security and access controls to the company’s facilities. - Completion of technical, technological, judiciary, etc. audits - Search of disciplinary or judicial history.

CUSTOMERS	<ul style="list-style-type: none"> - Development of the company's social object. - Monitoring and management of contractual and commercial relations. - Performing reports and assessments. - Obtaining financial, accounting, statistic, and/or historic registries - Keeping an individual dossier of the CUSTOMER - Compliance of legal requirements by competent authorities in exercise of their legal functions. - To handle paperwork, applications, complaints and claims. - To perform satisfaction surveys. - Security and access controls to the company facilities. - Mailing information about services and products of the company. - Completion of technical, technological, judiciary, etc. audits
EMPLOYEES	<ul style="list-style-type: none"> - Development of the company's social object. - Monitoring and handling of labor relationships - Compliance of legal labor obligations - Completion of performance evaluations and reports - Obtaining financial, accounting, statistic, and/or historic registries - Keeping individual dossiers of employees - Verification of academic, labor and personal references. - Completion of reports for control and vigilance authorities and the adoption of measures intended to prevent illegal activities. - Compliance of legal requirements by competent authorities in exercise of their legal functions - To handle paperwork, applications, complaints and claims. - Security and access controls to the company facilities. - Completion of technical, technological, judiciary, etc. audits. - Search of disciplinary or judicial history. - Complete labor wellbeing programs.
SUPPLIERS	<ul style="list-style-type: none"> - Development of the company's social object. - Monitoring and handling of contractual and commercial relations. - Completing performance reports and assessments. - Obtaining financial, accounting, statistic, and/or historic records - Keeping and individual dossier on suppliers - Completion of reports for control and vigilance authorities and the adoption of measures intended to prevent illegal activities. -To validate supplier or contractor's financial soundness and experience. - Compliance of legal requirements by competent authorities in exercise of their functions. - To handle paperwork, applications, complaints and claims. - To perform satisfaction surveys. - Security and access controls to the company facilities. - Completion of technical, technological, judiciary, etc. audits - Enquiries in restrictive lists.

In all cases, Hoteles Charleston Bogota SAS can perform personal data treatments for the execution of commercial transactions that involve the company such as sales, integrations, fusions, reorganizations, joint ventures, liquidations, etc.

According to the purposes afore mentioned the company can:

a. Know, store, and process all information offered by holders in one or several databases, in the most convenient format for the company.

b. Verify, corroborate, prove, validate, research, compare the information submitted by the holders with any legitimate information available.

c. Send the collected information to be treated by Hoteles Charleston Bogota SAS affiliates, its headquarters, and/or any entity that the company contracts for its services. Transmissions can be national or international, independently of any country and the protection regulations schemes of personal data in each jurisdiction. In all cases, the third party involved is responsible of guaranteeing the compliance of the principles of treatment, including security and confidentiality of the information.

d. Transfer collected data to be treated by Hoteles Charleston Bogotá SAS affiliated entities, its headquarters, and/or any entity that the company requires. Transmissions can be national or international, independently of any country and the protection regulations schemes of personal data en each jurisdiction. In all cases, the company will observe the requirements set by the Colombian Law for personal data international transfers.

7. Sensible personal data treatment:

Hoteles Charleston Bogotá SAS makes an effort in avoiding the treatment of sensible personal data. Nevertheless, if in the developing its social object would need personal data belonging to such category, the holders are not obliged to offer such information. For the treatment of sensible personal data, Hoteles Charleston Bogotá SAS will always require a prior, expressed, and informed authorization from the holders.

8. Holder´s rights and procedures

In accordance to Law 1581, 2012 the holders have the following rights:

a. To know, update and rectify their personal data. This right can be exercised, among others in front of partial, inexact, incomplete, fractioned data that mislead, or those in which treatment is expressly prohibited or has not been authorized.

b. Request proof of granted authorization, unless it is expressly exceptional as requisite for the treatment, according to the applicable legislation.

c. To be informed, previous request, regarding the use of the personal data.

d. To complain to the Superintendencia de Industria y Comercio for infringements of the current legislation.

e. To revoke authorization and/or request the removal of data, according to the law.

f. To access free of charge to the personal data that has been object of treatment.

Holder, successor and/or guardians can exercise the rights afore mentioned by means of a consultation and/or claim, under the following terms:

a. Consultation: Holders can consult free of charge their personal data once a month and every time there are substantial modifications to this policy. Holders should send a request to the attention channel to be defined ahead with the following information: (i) name and address of holder (or whomever is entitled to do it) or any other mean to receive a reply to the request, (ii) documents crediting holder´s identity, of whoever is entitled; and (iii) description and purpose of the consultation. Hoteles Charleston Bogotá SAS

should answer within ten (10) working days after the request has been received. Additionally, it should be informed if there is any cost for the request. In case that Hoteles Charleston Bogotá SAS can't give a reply to the request in the term afore mentioned, Hoteles Charleston Bogotá SAS must inform the petitioner the reason for the delay and indicate a new term for the reply, a term that cannot exceed five (5) additional working days from the expiration of the first term.

b. Claims: Holders can present a claim for the non-compliance of this policy and/or legislation, or can request a correction, update or deletion of their personal data. Holders should send a request to the attention channel defined ahead with the following information: (i) name and address of holder (or whomever is entitled to do it) or any other mean to receive answer to the request, (ii) documents crediting holder's identity of whomever is entitled; and (iii) description and purpose of the consultation; (iv) if it is the case, other documents or elements that are intended to be taken into account.

If the claim is not complete, Hoteles Charleston Bogotá SAS must answer within the next fifteen (15) working days of the reception of the request. In case of not being able to answer the claim within the afore mentioned term, the company must inform about the reasons for the delay and should indicate a new term to issue the reply, which cannot exceed eight (8) additional working days from the expiration of the first term. If the company is not able to meet the claim, it will be transferred to whom ever corresponds in a maximum term of two (2) working days and you will be informed of such situation.

Additionally, for the defense of the rights, the holders can contact Superintendencia de Industria y Comercio ("SIC") at Carrera 13 No. 27-00 Bogotá, to telephone number 018000 910165 and through the email contactenos@sic.gov.co

9. Responsible area for the implementation and vigilance of this policy

Hoteles Charleston Bogotá SAS designed a privacy committee to handle this policy implementation and vigilance. To contact the privacy committee, to present consultations or claims refer to email: CUSTOMERs and Hosts alejandrogonzalez@fourseasons.com, Employees and Candidates gina.reina@fourseasons.com and Suppliers: adrian.galindo@fourseasons.com

10. Security and confidentiality of personal data

Hoteles Charleston Bogotá SAS in strict application of the principle of security will offer all technical, human and administrative measurements that are necessary to grant the security of the records to avoid tampering, loss, consultation, non-authorized or fraudulent use or access. In the same way, the company will demand from the suppliers of services that it hires, the adoption and compliance of the adequate technical, human, and administrative measures for the protection of the personal data with which these suppliers act as administrators.

11. Duration

This policy is in force since June 1, 2017. Hoteles Charleston Bogotá SAS will previously notify about substantial changes to this policy.