



Privacy Policy

voco Seoul Myeongdong Hotel ("the Hotel") is committed to protecting the valuable personal information of our customers and processes it securely and responsibly. The personal information you provide to us with your consent is handled in strict compliance with the Personal Information Protection Act (PIPA), the Act on Promotion of Information and Communications Network Utilization and Information Protection, and relevant regulations and guidelines.

This Privacy Policy is always publicly available on our website for your easy reference. If any changes, additions, or deletions are made in accordance with legal or internal policy updates, we will notify users at least 7 days prior to the effective date.

Our Privacy Policy includes the following key items:

Article 1. Collection, Purpose, Items, and Retention Period of Personal Information

- The Hotel collects personal information either mandatorily or optionally within the necessary scope to provide smooth and high-quality services to our customers.
- In the case of optional collection, the following details will be clearly communicated at the time of collection, and such data will only be processed after obtaining your consent:
 - 1. Items of personal information collected
 - 2. Purpose of collection and use
 - 3. Retention and usage period
 - 4. Right to refuse collection and possible disadvantages

Through this process, your rights are respected, and all the information provided is strictly protected based on reliable management standards.

1 Items of Personal Information Collected

| Category | | Items Collected | |
|-------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Restaurant Reservation | Required | Name, Contact Number and Email Address | |
| | Required | Name, Address, Phone Number, Nationality, Payment Method and Passport Number | |
| Room Reservation | Optional | Date of Birth, Email Address, Company Name, Position, Title, Arrival, Departure, Confirmation Number, Adult/Child, Room Number, Room Rate, Rate Code, User Account, IHG One Rewards status and Frequent Flyer Number. | |
| | Required | Name, Address, Phone Number, Nationality, Payment Method and Passport Number | |
| In-house Guests Option: | | Date of Birth, Email Address, Company Name, Position, Title, Arrival, Departure, Confirmation Number, Adult/Child, Room Number, Room Rate, Rate Code, User Account, IHG One Rewards status and Frequent Flyer Number. | |
| VOC (Voice of Customer) | Required | Name, Email Address, Gender and Contact Number | |
| Banquets / Weddings | Required | Name, Address, Contact Number and Email Address | |
| Event Participation | Optional | Name, Address, Date of Birth, Phone Number, Email Address, Company Name and Position | |





2 Purpose of Collection, Related Laws, and Retention Period

| Category | Purpose of Collection | Relevant Law | Retention Period |
|--------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|
| Restaurant Reservation | Identity verification Contact and provide guidance for service execution Notification Complaint handling | Act on Consumer Protection in Electronic Commerce, Article 6, Enforcement Decree Article 6 | Until the end of service or until the legal retention period expires. |
| Online Room Reservation | - Room reservation services - Reservation-related notifications - Complaint handling - Fraud prevention - Use of payment card information for reservation - Use of facility service information | Act on Consumer Protection in | 5 years after check-out. |
| In-house Guest Registration | Identity verification Guest notification Complaint handling Personalized services and promotions Marketing use | Electronic Commerce, Article 6, Enforcement Decree Article 6, Personal Information Protection Act, Article 15(1)(4) | 5 years after check-out. |
| VOC (Customer Feedback) | - Identity verification - Contact and guidance for service execution - Complaint handling | | 5 years after VOC registration/proce ssing completion |
| Banquets / Weddings | - Identity verification - Contact and guidance for service execution - Complaint handling | Act on Consumer Protection in Electronic Commerce, Article 6, Enforcement Decree Article 6 | 5 years after service completion or disposed of within 5 days of cancellation. |
| Event Participation | - Identity verification - Contact and guidance for service execution - Complaint handling | Personal Information Protection Act, Articles 21 & 22 | As per the consented period. |

Article 2. Personal Information of Children Under the Age of 14

- If the Hotel collects the personal information of children under the age of 14, we obtain consent from their legal guardian. The following procedures are observed:

1. Minimal Information Collection

Only essential details required for the consent process such as the name and contact information of the legal guardian are collected.

2. Consent Confirmation and Notification

The result of the legal guardian's consent is communicated via SMS.

3. Use and Disposal of Collected Information

The collected information is only used for the consent process. If consent is not granted, it is automatically disposed of within 5 days.





Article 3. Retention and Processing Period of Personal Information

| Category | Reason for Retention | Retention Period |
|-------------------------------------------------------------------|--------------------------------------------------------------------------------|---------------------|
| Records related to contracts or withdrawal of subscription | | 5 years |
| Records of payment and supply of goods, etc. | Act on the Consumer Protection in Electronic Commerce | 5 years |
| Records of consumer complaints or dispute resolution | | 3 years |
| Important documents such as commercial books and business records | Commercial Act, Article 33 (Preservation of Commercial Books, etc.) | 10 years |
| Records related to claims and property rights | Civil Act, Article 162 (Extinctive Prescription of Claims and Property Rights) | 10 years |
| Expenditure receipts for other incomerelated costs | Income Tax Act, Article 106-2 (Receipt and Retention of Proof of Expenditures) | 5 years |
| Ledgers and supporting documents as prescribed by tax law | Framework Act on National Taxes | 5 years |
| Records of electronic financial transactions | Electronic Financial Transactions Act | 5 years |
| Service access logs | Protection of Communications Secrets Act | 3 months |
| Vouchers or similar records | Commercial Act | 5 years |
| Records related to foreign exchange transactions | Foreign Exchange Transactions Act | 5 years |

[🛪] In case of investigations or unresolved obligations, retention continues until resolution.

- 1. If an investigation or inquiry is underway due to a violation of relevant laws and regulations, it will continue until the completion of the investigation or inquiry.
- 2. If there are outstanding claims or liabilities related to the use of the website, the retention period will last until the settlement of such claims or liabilities.
- 3. In the case of <exceptional reasons>, the retention period will last until the <retention period>.

Article 4. Procedures and Methods for Disposal of Personal Information

- The Hotel will promptly and securely dispose of personal information without delay when the retention period has expired or when the purpose of processing has been fulfilled, and the information is no longer necessary.

** However, items of personal information that must be retained in accordance with other laws and regulations, along with their legal basis, can be found in "Article 1. Collection, Purpose, Items, and Retention Period of Personal Information" and "Article 3. Retention and Processing Period of Personal Information" of this policy.

Procedures and Methods for Disposal of Personal Information:

1. Disposal Procedure

When a reason for disposal of personal information arises, the relevant information is selected, and the disposal process is carried out with the approval of the Hotel's Personal Information Protection Officer.

2. Disposal Method

① Personal information in electronic file format

Permanently deleted using secure technical methods that prevent recovery or reproduction.

2 Personal information in paper document format

Disposed of by means of shredding or incineration.

The Hotel makes every effort to securely manage and protect your personal information.





Article 5. Provision of Personal Information to Third Parties

- The Hotel uses customers' personal information only within the scope specified for processing purposes and may provide it to third parties only under the following circumstances:

1. Special Provisions of the Law and Consent of the Data Subject

In accordance with Articles 17 and 18 of the Personal Information Protection Act, personal information may be provided to a third party only with the explicit consent of the data subject or when specifically required by law. Under no other circumstances will personal information be disclosed.

2. Provision of Personal Information to Overseas Entities

To ensure smooth and high-quality service, personal information may be provided to overseas entities. In such cases, information is provided only to the minimum extent necessary and only after obtaining the consent of the data subject. The Hotel exercises strict management to ensure the information is handled securely.

| Recipient | Purpose of Provision | Items Provided | Transferred Overseas | Retention & Use Period | Legal Basis |
|--------------------------------------|--------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------|--------------------------------|--------------------------------------------------------------|
| IHG-branded hotels and resorts | Recognition Service Provision, Point Usage, Approval and Affiliate Service Provision | Name, Email Address, Home and Work Address, Phone Number, Nationality, Date of Birth and Payment Card Information | Yes | Until membership withdrawal | Personal Information Protection Act, Article 17 (1)(1) |

^{**} For details on the international transfer of personal information (third-party provision), including the destination country, timing and method of transfer, and consequences of refusal, please refer to "Article

Article 6. Matters Concerning Outsourcing of Personal Information Processing

- The Hotel outsources certain tasks related to personal information processing to ensure the efficient handling of services, as outlined below:

| Contractor (Trustee) | Outsourced Tasks |
|------------------------|----------------------------------------------------------------|
| Oracle Korea | Operation and maintenance of the hotel guest management system |
| UJung Information Inc. | Maintenance of the payment information management system |
| Amadeus Delphi | Operation and maintenance of the group/event management system |
| HCM (Concerto) | Operation and maintenance of the hotel guest management system |
| Tab l eCheck | Operation and maintenance of the restaurant reservation system |
| Shiji Infrasys POS | Operation and maintenance of the F&B management system |
| Amadeus HotSOS | Room maintenance and facility management |
| KICC | Credit card payment processing |
| Medalia | Guest satisfaction surveys |

1. Ensuring Security When Outsourcing Personal Information Processing

In accordance with Article 26 of the Personal Information Protection Act, the Hotel includes the following in all outsourcing contracts: prohibition of personal information processing beyond the scope of the commissioned task, implementation of technical and managerial protection measures, restrictions on subcontracting, management and supervision of contractors, and liability for damages. The hotel also rigorously supervises whether contractors handle personal information securely.

2. Consent Procedure for Subcontracting

According to Article 26(6) of the Personal Information Protection Act, if a contractor wishes to subcontract any personal information processing tasks, they must first obtain prior consent from The Hotel.

3. Transparent Notification of Changes

^{7.} Matters Concerning the Overseas Transfer of Personal Information"





Any changes to the details of the entrusted services or to the entrusted party, will be promptly disclosed to customers through the Privacy Policy.

4. Strict Management of Overseas Outsourcing

Some tasks related to personal information may be carried out overseas. In such cases, customer information is handled securely in accordance with the Hotel's strict controls and data protection policies.

| Contractor | Oracle (Opera) | Amadeus (Delphi) | Concerto (HCM) | |
|------------------------|-----------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|--|
| Location | USA | USA | Singapore | |
| Time & Method | Upon registration or information update | Upon registration or information update | Upon registration or information update | |
| Contact | 02-2194-8700 | https://www.salesforce .com/company/privacy/ Salesforce Data Protection Officer 415 Mission St., 3rd Floor San Francisco, CA 94105, USA Email: privacy@salesforce.com Phone: 1-844-287-7147 | +65 6395-6166 | |
| Personal Info Provided | Name, address, contact details, email | Name, address, contact details, email | Name, address, contact details, email | |
| Purpose of Processing | Guest management | Group and event management | Guest management | |
| Retention Period | 5 years | 5 years | 5 years | |

The Hotel is committed to protecting customers' valuable personal information and maintaining their trust to the highest standard.

Article 7. Matters Concerning the Overseas Transfer of Personal Information

- The Hotel may transfer or entrust the processing of personal information to overseas entities as necessary to provide services to customers, as outlined below:

1. Overseas Transfer and Data Backup

To ensure prompt recovery in the event of data loss caused by natural disasters or unforeseen incidents, the Hotel adheres to a policy of backing up and storing all data. During this process, personal information may be transferred overseas.

2. If You Do Not Wish for Overseas Transfer

① Website

Customers may withdraw their membership directly by navigating to [Menu] - [My Info] - [Withdraw Membership] on the hotel's website.

② Customer Center

You may also request membership withdrawal by contacting the customer center at +82-2-6923-6700.

The Hotel is committed to protecting your valuable personal information, complying with applicable laws, and managing your data safely and responsibly.

| Recipient | IHG Overseas Chain Hotels |
|--------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Location | Overseas IHG chain hotels |
| Date & Method of Transfer | Via Oracle private network |
| Contact for Data Protection | InterContinental Hotels Group Attn: Privacy Office Three Ravinia Drive Atlanta, Georgia 30346 • Phone: 1-770-604-8347 • Fax: 1-770-604-5275 privacyoffice@ihg.com |





| Transferred Items | Personal information collected with membership consent | | |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| Purpose of Processing | Approval of point usage, provision of affiliate and recognition services | | |
| Retention & Use Period | Until membership withdrawal | | |
| Legal Basis | Pursuant to Article 28-8 (1) 3 of the Personal Information Protection Act (PIPA), IHG, as a global chain enterprise, may transfer customers' personal information overseas for the purpose of providing seamless services and operating its global system. | | |

Article 8. Measures to Ensure the Security of Personal Information

The Hotel implements the following safety measures to securely protect customers' valuable personal information:

1. Regular Internal Audits

To ensure the safety of personal information handling, regular internal audits are conducted.

2. Establishment and Implementation of Internal Management Plans

A systematic internal management plan is established and strictly enforced to ensure personal information is safely processed.

3. Encryption of Personal Information

Critical personal information, as required by law, is encrypted and managed so that only the data subject can verify it. In addition, key data is encrypted or protected using security features such as file locking during storage and transmission.

4. Technical Measures Against Hacking and Viruses

To prevent the leakage or damage of personal information, security software is installed and regularly updated and inspected. In addition, systems are located in access-controlled areas to ensure both technical and physical monitoring and protection from external threats.

5. Access Restriction to Personal Information

Access to the database systems that process personal information is controlled through the granting, modification, and deletion of access rights. Additionally, intrusion prevention systems are employed to thoroughly prevent unauthorized external access.

6. Access Log Management and Protection

Records of access by personnel handling personal information are managed and securely stored to prevent tampering, theft, or loss.

7. Use of Locking Devices for Document Security

Documents containing personal information and external storage devices are stored in secure locations equipped with protective mechanisms to ensure safety.

8. Control of Unauthorized Physical Access

Access control procedures are established and strictly implemented to prevent unauthorized entry into physical locations where personal information is stored.

The Hotel continuously enhances its technical, administrative, and physical safety measures to ensure the protection of customers' personal information.

Article 9. Number, Location, and Coverage of CCTV Cameras

- ① The Hotel is equipped with a total of 240 CCTVs installed throughout the hotel, including the parking lot, restaurants, event venues, lobby, front desk, hallways etc.
- ② Black Box Installation: N/A

Article 10. Management Responsibility and Access Rights

To protect personal video information and handle any complaints related to it, the Hotel has designated the following individuals as the personal video information management officers and those with access rights:





| Type | Name | Position | Department | Contact |
|-----------------------|-------------|-----------------|-----------------------|-----------------|
| Management Officer | JooHyun Cho | Team Leader | voco Seoul Myeongdong | +82-2-6923-6890 |
| Access Rights Officer | TaeHo Kim | Department Head | POS-M KOREA | +82-2-6923-6891 |

Article 11. Recording Time, Retention Period, Storage Location, and Processing Method

| Recording Time | Retention Period | Storage Location |
|----------------|---------------------------------|------------------|
| 24 hours | 30 days from the recording date | NVR HDD Storage |

Processing Method:

Requests concerning the use of personal video information beyond its original purpose, its provision to third parties, disposal, or access are recorded and managed. When the retention period expires, the information is permanently deleted in an irrecoverable manner.

Article 12. Method and Location for Accessing Personal Video Information

To access Personal Video Information, please contact the designated officer in advance, as direct viewing of the CCTV is restricted and a security staff member will review the footage and provide the information.

Article 13. Actions on Requests for Access to Personal Video Information

Individuals may request to view, confirm the existence of, or delete Personal Video Information related to them at any time. However, this applies only to footage where the individual appears, or when it is clearly necessary for the urgent benefit of the data subject's life, body, or property. The Hotel will take necessary action promptly in response to such requests.

Article 14. Measures to Ensure the Safety of Personal Video Information

The Personal Video Information handled by the Hotel is securely managed through encryption and other safety measures. Additionally, the Hotel applies management controls to restrict access based on roles, records the date, purpose, and person who accesses the image information to prevent tampering, and ensures safe physical storage by installing appropriate locking devices.

Article 15. Rights and Obligations of Data Subjects and Legal Guardians, and Methods of Exercise

 The data subject may exercise a variety of rights regarding their personal information with the Hotel at any time. These rights include the following:

1. Rights of the Data Subject

- ① Request to access, correct, delete, or suspend the processing of personal information, or withdraw consent to the collection and use
- ② Refuse automated decision-making or request an explanation regarding such decisions
- ** For children under the age of 14, these rights may only be exercised by a legal guardian. Minors aged 14 and above may exercise their rights themselves or through their legal guardian.

2. How to Exercise Rights

In accordance with Article 41(1) of the Enforcement Decree of the Personal Information Protection Act, the data subject may exercise their rights in writing, by email or by fax. The Hotel will promptly act upon receiving the request.

3. Exercising Rights through a Representative

The data subject may exercise their rights through a legal representative or a delegated proxy. In such cases, a power of attorney using Form No. 11 of the "Notification on the Method of Processing Personal Information"





must be submitted.

4. Limitations and Exceptions

- ① Requests for access or suspension of processing may be restricted in accordance with Article 35(4) and Article 37(2) of the Personal Information Protection Act.
 - ② Personal information that is required to be collected by other laws cannot be deleted upon request.

5. Verification of Identity or Representation

The Hotel will verify whether the person exercising the rights is the data subject or a legitimate representative before processing the request.

6. Inquiries and Submission of Requests

To ensure the smooth and timely exercise of rights, the hotel has a dedicated department to receive and process such requests. The Hotel will make every effort to respond sincerely to customers' requests.

▶ Department for Receiving and Processing Requests Related to Personal Information

Department: Finance Department, voco Seoul Myeongdong Hotel

Address: 52 Toegye-ro, Jung-gu, Seoul, Republic of Korea

Contact Number: +82-2-6923-6700

Article 16. Remedies for Infringement of Rights

| Organization | Phone Number | Website |
|-----------------------------------------------------------------------|--------------------------|--------------------------|
| Personal Information Infringement Report Center | 118 (no area code) | privacy.kisa.or.kr |
| Personal Information Dispute Mediation Committee | 1833-6972 (no area code) | www.kopico.go.kr |
| Korea Internet & Security Agency (KISA) – Incident Response Center | 118 (no area code) | www.krcert.or.kr |
| Cyber Bureau, Korean National Police Agency | 182 (no area code) | cyberbureau.police.go.kr |
| Cyber Investigation Division, Supreme Prosecutors' Office | 1301 (no area code) | cid@spo.go.kr |

Article 17. Contact Details of the Personal Information Protection Officer and Department

To clearly define responsibility for personal information processing and to handle customer complaints and damage relief requests, the Hotel has designated the following personnel:

1. Chief Privacy Officer Name: JungHwan Shin

Email: jungHwan.shin@ihg.com Phone: +82-2-6923-6710

Department: Finance Department Position: Director of Finance

2. Data Handler

Name: KwangHo Jin

Email: kwangHo.jin@ihg.com Phone: +82-2-6923-6790

Department: Information Technology Office Position: Information Technology Manager

3. Customer Inquiries and Handling Procedure

Customers may contact the Personal Information Protection Officer or the department responsible regarding inquiries, complaint handling, and damage relief related to personal data while using The Hotel's services. the Hotel guarantees a prompt and sincere response to all customer inquiries.

Article 18. Changes to the Privacy Policy

- Announcement & Effective Date: January 20, 2025