swissôtel QUITO

PERSONAL DATA PROTECTION POLICY

H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) is a company dedicated to providing high-quality hotel services, aware of its social responsibility, and committed to ensuring the protection of the personal data of its guests, suppliers, clients, and employees, by implementing all necessary security measures to protect and safeguard personal data, in accordance with the Personal Data Protection Law, its regulations, and any other applicable regulations. To this effect, the following policy is established:

1. PRINCIPLES

• **Legality** – Personal data must be processed in strict compliance with the principles, rights, and obligations established by the Constitution, international instruments, this Law, its Regulations, and other applicable laws and jurisprudence.

• **Fairness** – The processing of personal data must be fair, meaning that it must be clear to the data subjects that their data is being collected, used, consulted, or otherwise processed, along with how it will be processed.

Under no circumstances may personal data be processed by unlawful or unfair means.

• **Transparency** – The processing of personal data must be transparent. Therefore, all information or communication related to this processing must be easily accessible and understandable, using simple and clear language.

Relations arising from the processing of personal data must be transparent and governed by the provisions in the Law, its regulations, and other relevant legal standards.

• **Purpose** – The purposes of data processing must be determined, explicit, legitimate, and communicated to the data subject; personal data must not be processed for purposes other than those for which it was collected, unless one of the grounds allowing for new processing under legitimate processing assumptions stated in the law is applicable.

The processing of personal data for purposes different from those for which it was initially collected should only be allowed when it is compatible with the original purposes. This must consider the context in which the data was collected, the information provided to the data subject during this process, and the data subject's reasonable expectations based on their relationship with the data controller regarding the later use of the data.

• **Data Minimization** – Personal data must be relevant and limited to what is necessary for the fulfillment of the processing purpose.

• **Proportionality of Processing** – The processing must be adequate, necessary, timely, relevant, and not excessive in relation to the purposes for which the data was collected, or to the nature of the data categories.

• **Confidentiality** – The processing of personal data must be based on confidentiality and secrecy. It should not be processed or communicated for purposes other than those for which it was collected, unless one of the grounds allowing for new processing under legitimate processing assumptions is met. For this purpose, the data controller must implement appropriate technical and organizational measures.

• **Data Quality and Accuracy** – Personal data processed must be accurate, complete, precise, clear, and, where applicable, properly updated to ensure its truthfulness is not altered. Reasonable measures will be adopted to delete or rectify inaccurate personal data without delay in relation to the purposes for which it is processed.

If the processing is carried out by a processor, the responsibility for data quality and accuracy lies with the data controller.

• **Data Retention** – Personal data will be retained for no longer than necessary to fulfill the purpose of processing.

To ensure personal data is not retained longer than necessary, the data controller will establish retention periods for deletion or periodic review.

Extended data retention for the purpose of archiving in the public interest, scientific, historical, or statistical research purposes will only occur with the necessary security and protection measures, as established by the applicable regulations.

• **Data Security** – The data controllers and processors must implement adequate and necessary security measures, which are accepted as state-of-the-art techniques, whether organizational, technical, or otherwise, to protect personal data from risks, threats, and vulnerabilities, considering the nature of the personal data, the scope, and context.

• **Proactive and Demonstrable Responsibility** – The data controller must demonstrate that mechanisms have been implemented for the protection of personal data, ensuring compliance with the principles, rights, and obligations established in this Law. In addition to the established regulations, they may use standards, best practices, self-regulation schemes, data protection codes, certification systems, and other mechanisms deemed appropriate for the purposes of ensuring personal data protection.

• **Favorable Interpretation for the Data Subject** – In case of doubt about the scope of legal or contractual provisions related to personal data protection, judicial and administrative authorities must interpret and apply them in the most favorable way for the data subject.

• **Independence of Control** – To effectively exercise the right to personal data protection, and to fulfill the obligations of protecting rights, the Data Protection Authority must exercise independent, impartial, and autonomous control, and carry out actions of prevention, investigation, and sanction.

2. **RESPONSIBLE PARTY**

The data controller is the entity that decides the purposes and means of processing personal data. In this regard, the data controller is: H.O.V. Hotelera Quito S.A. – located at Avenida 12 de Octubre 1820 and Luis Cordero, Quito – Ecuador, with the following websites: www.swissotelquito.com, www.ibisstylesgye.com, www.plazagrandequito.com.

3. PERSONAL DATA PROCESSING AND PURPOSES

H.O.V. Hotelera Quito S.A. –– (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) receives data that includes the following:

CLIENTS:

Personal data related to hotel and related services provided, as well as reservations made through various channels, personal data submitted by any means to H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) –, and information collected through the websites www.swissotelquito.com, www.ibisstylesgye.com, www.plazagrandequito.com when providing personal data collected for accommodation purposes.

In general, H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) collects the following data: name, national ID number, profession, nationality, date of birth, marital status, email address, personal preferences and interests, length of stay, occupation or activity, consumption or travel habits, health status, and medical conditions. Additionally, information related to credit cards, debit cards, bank accounts, or any other payment method provided for making a reservation or requesting additional services.

All the aforementioned data will be used for the normal development of the hotel business, as well as for processing reservations, accommodation purchases, additional service purchases, sending promotions and offers, sending greetings for special occasions, sending invitations, and sending satisfaction surveys, all through various communication methods.

By accessing the websites www.swissotelquito.com, www.ibisstylesgye.com, and www.plazagrandequito.com, you authorize your information and data to be shared with

the tourism service providers to whom they pertain and with whom your reservations and/or requests are processed.

The data and general information received when accessing the websites www.swissotelquito.com, www.ibisstylesgye.com, and www.plazagrandequito.com may include both your own information and data from the device you are using to access the sites.

EMPLOYEES:

Data for the execution of the Employment Contract, affiliation with the worker's and their family members' Social Security entities, health data of the worker and their dependents, contact details different from those of the worker in case of requiring notification of work-related events (absence, emergency, accident, among others) related to the worker. Data requested to comply with regulations regarding anti-money laundering and terrorism financing risk management systems. All this data is used to manage an employment relationship with the worker, based on their employment contract.

SUPPLIERS:

Data related to fulfilling the purpose of the executed contract, data for procedures and processes related to compliance with tax, accounting, and administrative obligations, and billing and payment management.
All this data is collected to ensure proper commercial and business management.

In general, in cases where we collect and process your sensitive data, it will be handled in strict compliance with the provisions of the Organic Law on Personal Data Protection and this policy. The data subjects are informed that they are not obliged to authorize the processing of sensitive data under any circumstances, and therefore, the provision of our services is not conditioned upon the submission of such sensitive information.

H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) will ensure the proper use of personal data of minors, guaranteeing that the processing of their data respects their best interests, fundamental rights, and, whenever possible, considers their opinion as holders of their personal data.

Authorization for Processing Special (Sensitive) Data:

When collecting sensitive data, the following requirements must be met:

- Authorization must be explicit.
- The data subject must be informed that they are not required to authorize the processing of such information.

- The data subject must be explicitly and previously informed which data is considered sensitive and the purpose of processing such data.

Video Surveillance Systems

H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) – uses various video surveillance means (video and image) installed in different internal and external locations within its facilities or offices. Therefore, it informs its employees, clients, suppliers, and the general public about the existence of these security mechanisms through the visible placement of video surveillance notices.

The information collected through this mechanism is used for security purposes, service improvement, and enhancement of the experience within the facilities of H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) –. Additionally, it may serve as evidence in any type of legal process before any authority or organization.

3. USE OF COOKIES

The User and visitor of the websites: www.swissotelquito.com, www.ibisstylesgye.com, www.plazagrandequito.com acknowledge and accept that H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) – may collect certain information through the use of cookies.
The information collected through cookies includes, among others, the User's access path to the website, visited pages, originating IP address, browser type, browser language, and the date and time of the User's visit.
This information helps H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) – track trends and improve areas of our website based on visits. This type of analysis is commonly used by most websites. At any time, the User may uninstall cookies from their computer (Internet browser), as this depends solely on their will, and they can delete them whenever they wish.

4. AUTHORIZATION OF THE DATA SUBJECT

The provided data will be subject to authorized processing, granted in advance, expressly, in an informed and unequivocal manner by the Data Subject directly to H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande).

5. RIGHTS AND POWERS OF THE DATA SUBJECT

The data subject has the rights established in the Organic Law on Personal Data Protection, including access, rectification or updating, deletion, objection, and portability.

6. PROCEDURE FOR EXERCISING RIGHTS

Inquiries and claims submitted by data subjects or those authorized to exercise their rights under the Organic Law on Personal Data Protection and applicable regulations may file their claims to exercise the right of access, rectification or update, deletion, information correction, suspension of processing, objection, deletion, or revocation of authorization, in accordance with the Organic Law on Personal Data Protection. Claims will be received, processed, and handled through:

1. The General Management of H.O.V. Hotelera Quito S.A.
2. Email:
    - **proteccion_datos@swissuio.com** (Swissôtel Quito)
    - **proteccion_datos@plazagrandequito.com** (Hotel Plaza Grande)
    - **proteccion_datos@ibisstylesgye.com** (Ibis Styles Malecón)

To submit and process your request, we ask that you provide the following information:

- Full name and surname of the data subject and/or their representative and/or successors
- Identification number
- Contact details (physical and/or electronic address and phone numbers)
- Means to receive a response to your request
- Reason(s)/fact(s) leading to the request with a brief description of the right you wish to exercise (access, update, rectify, request proof of authorization granted, revoke, delete, obtain access to the information, etc.)
- The respective documentation that verifies legal representation
- The request for information consultation may be made by the data subject or their representative, who will be provided with all the information contained in the individual record or linked to the Data Subject's identification. This consultation will be answered within a maximum period of fifteen (15) business days from the date of receipt and will be free of charge.

Once the complete request is received, a note stating "request in process" and its reason will be added to the database within no more than two (2) business days. This note must remain until the claim is resolved. The maximum period for resolving the claim will be fifteen (15) business days from the day following the date of receipt.

8. SECURITY

The collected data will always be processed within a framework of confidentiality and will not be shared, transferred, or provided to persons outside of H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande), unless there is legitimate authorization for it.

9. DATA RETENTION

H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) – will retain personal information for a reasonable period necessary according to the purposes that justified its processing, taking into account administrative, accounting, tax, legal, and historical aspects of the information. Once the purposes of processing are fulfilled, and unless otherwise required by law, H.O.V. Hotelera Quito S.A. – (Swissôtel Quito, Ibis Styles Malecón, Hotel Plaza Grande) – will proceed to delete the personal data in its possession. However, personal data must be retained when required to fulfill a legal or contractual obligation.

10. VALIDIT

This personal data processing policy is effective as of November 1, 2024. Any substantial changes to the personal data processing policies will be communicated in a timely manner through the websites: www.swissotelquito.com, www.ibisstylesgye.com, www.plazagrandequito.com.