



WATERFRONT
HOTELS & CASINOS

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DATA PRIVACY STATEMENT



The Waterfront Hotels and Casinos and its subsidiaries/affiliates (hereinafter, the **Waterfront Group**, and the words **We**, **Us**, and **Our** referring to the same) strongly commit to provide protection of our customers' Personal Data from any breaches or unauthorized use thereof, in compliance with Republic Act No. 10173, otherwise known as the Data Privacy Act of 2012 (**DPA**), and its implementing rules and regulations (**IRR**) issued by the National Privacy Commission (**NPC**).

In line with this commitment and to ensure you can make informed decisions and feel confident about supplying us with your Personal Data, we provide you with this Data Privacy Statement (the **Statement**) which outlines our data collection, usage, retention, disclosure, and disposal practices, as well as your rights as Data Subjects, as defined under the DPA and its IRR.*

This Statement applies to all customers whose Personal Data are processed by the Waterfront Group. Further, it explains –

- (1) how we collect your Personal Data;
- (2) how we use information collected from you;
- (3) how and to whom we share information about you;
- (4) how we store and dispose of information about you;
- (5) your rights as Data Subjects;
- (6) the notification requirement in case of Personal Data Breach;
- (7) the effects of any amendments to this Statement; and
- (8) where you may go for further information.

DEFINITIONS

- ▶ **Personal Information** refers to any information, whether recorded in a material form or not, from which the identity of an individual is apparent or can be reasonably and directly ascertained by the entity holding the information, or when put together with other information would directly and certainly identify an individual.
- ▶ **Personal Data** refers to all types of Personal Information (e.g., your name, contact number, address, age, gender, passport or other identification document details, personal financial information, frequent flyer or travel partner information, other Personal Information).
- ▶ **Data Subject** refers to an individual whose Personal, Sensitive Personal, or Privileged Information is processed.
- ▶ **Sensitive Personal Information** refers to Personal Information (1) about your race, ethnic origin, marital status, age, color, and religious, philosophical, or political affiliations; (2) about your health, education, genetic or sexual life, or to any proceeding for any offense committed or alleged to have been committed by you, the disposal of such proceedings, or the sentence of any court in such proceedings; (3) issued by government agencies peculiar to you, which includes, but is not limited to, social security numbers, previous or current health records, licenses or its denials, suspension or revocation, and tax returns; and (4) specifically established by an executive order or an act of Congress to be kept classified.
- ▶ **Privileged Information** refers to any and all forms of data, which, under the Rules of Court and other pertinent laws constitute privileged communication.
- ▶ **Processing** refers to any operation or any set of operations performed upon personal data including, but not limited to, the collection, recording, organization, storage, updating or modification, retrieval, consultation, use, consolidation, blocking, erasure or destruction of data. Processing may be performed through automated means, or manual processing, if the personal data are contained or are intended to be contained in a filing system.
- ▶ **Personal Data Breach** refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Data transmitted, stored, or otherwise processed.



**HOW DO WE COLLECT
YOUR PERSONAL DATA?**

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1.1. When you request for a particular service from us, we will or may ask for your Personal Data for us to process your transaction. Below are the activities where we will or may collect your Personal Data:

▶ **When making a reservation**

Upon receipt of your reservation inquiry, our Front Office (FO) personnel will redirect you to our Central Reservations Office (CRO), who will then book your reservation details in our computer system. On the other hand, for walk-in customers, our FO personnel will check for room availability in our records and proceed with the check-in/registration process once you have agreed with the accommodation package offered.

▶ **During check-in/registration**

Our FO personnel will retrieve your guest profile or reservation details in our computer system to check for your reservation or existing records. We will

collect your Personal Data through our Registration Card and you will be requested to present one (1) valid ID for identity verification.

Should you be a first time guest of any of the Waterfront Group properties, our FO personnel will create your profile using the information you have provided in the Registration Card and the ID that you have presented will be scanned and uploaded to our computer system.

▶ **During your stay at the Waterfront Group property**

You may avail of any of our hotel products and services during your stay at any of the Waterfront Group properties. In which case, to process your requested service, you may be required to provide your Personal Data on the following activities:

- **Housekeeping Services.** Our room attendants will collect your Personal Data when you request for the following services:

- (i) Laundry services (either in-house or outsourced) – Your Personal Data will be obtained in the Valet Service Form or equivalent document.
 - (ii) Loan/Requested Items – Your Personal Data will be obtained through our Loan/Requested Items Form as documentation of your request and acknowledgement of receipt of the items loaned/requested.
- **Wellness Activities/Programs.** Your Personal Data will be collected during your registration in any of our wellness activities/programs such as Pool and/or Gym Membership, Sports Performance and Rehabilitation, and Massage Center.
 - **Transportation Arrangements.** Our FO personnel will collect your Personal Data for the purpose of booking your transportation details (e.g., pick-up from airport, transport drop-off location, time and date, flight booking) with our in-house or accredited third-party transportation service provider.
 - **Food and Beverage Services.** When you avail of our products and services in any of our

hotel outlets/restaurants, we will collect your Personal Data for the purpose of recording your transactions (e.g., cash/credit payment, availment of complimentary breakfast, or charging of bills to room accommodation) with us.

- **Feedbacks.** We also value your opinion. We have Guest Feedback Forms placed in your assigned room, reception area, and restaurants that you can accomplish to provide your honest feedback about our products and services. Should you opt to answer our Feedback Forms, you will have to seal the same for privacy and security purposes. You may also drop the Feedback Form in the designated drop box located at the reception area. You may also place or leave the Feedback Form in your assigned room, which will be collected by the room attendants during check-out, or submit it to our restaurant staff, if feedback is solicited or voluntarily provided to the outlet/restaurant.

- 1.2. You have the option to choose which Personal Data you are comfortable to share with us. However, if you choose not to provide the Personal Data that is necessarily required, we may not be able to provide, process, or maintain the requested services or complete your transaction.



**HOW DO WE USE INFORMATION
COLLECTED FROM YOU?**

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2 HOW DO WE USE INFORMATION COLLECTED FROM YOU?

2.1. *Hotel Services.* Your Personal Data will be used by the Hotel to fulfill our services and to serve you as our valued customer. Users of your Personal Data will be limited only to those personnel authorized, as part of their duties and responsibilities.

- ▶ **Housekeeping** – Your Personal Data will be used by our room attendants, housekeeping coordinator/s, and Housekeeping Manager, to fulfill housekeeping activities such as room cleaning, laundry services, charging of mini-bar consumptions, loans/requested items, and lost and found notification.
- ▶ **Wellness Programs** – Your Personal Data will be used when you avail of or enroll in any of our wellness programs, which include Massage Center, Pool Use and/or Membership, Citi Gym Use and/or Membership, and Sports Performance and Rehabilitation. Your Personal Data will serve as our records to enable us to provide the requested services, document your transaction, and appropriately charge fees to your account.

- ▶ **Transportation Arrangements** – Your Personal Data will be utilized by our authorized transportation service provider to pick-up and transport you on the date, time, and location requested, and to appropriately charge transportation fees to your account.
- ▶ **Food and Beverage Services** – Your Personal Data will be used by our outlet/restaurant receptionists/cashiers to determine if you have complimentary meals, document your transaction, and appropriately charge fees to your account.
- ▶ **Luggage Monitoring** – Your Personal Data collected during check-in will be utilized to account for and monitor luggage and other personal belongings that you have placed under our care prior to or during your check-in or check-out at the hotel.
- ▶ **Feedbacks Summary** – Your Personal Data and feedback on our products and services will be collated by our Corporate Standardization Department to determine areas for improvement, recognize commended peers, and address your concerns as our valued customer.

- 2.2. **Accounting Purposes.** Your Personal Data, including the transactions that you have entered into with the Waterfront Group, will be used by our Finance Department to record your itemized spending, verify/audit validity of these transactions, properly charge fees to your account, send billings, and record all settled and unsettled fees.
- 2.3. **Marketing Purposes.** Using your contact information, the Waterfront Group may send you e-mails or messages through SMS regarding our promotions or special offers. It is, however, our intention to only send you marketing communications that you may want to receive. Therefore, every time you receive an e-mail or SMS, we will provide you the option to subscribe or unsubscribe to all our future communications.
- 2.4. **Financial Audit.** In preparing our financial reports, we will or may provide documents or files that may bear

your Personal Information to our external auditors who are engaged to check for the consistency, accuracy, and validity of our financial records.

- 2.5. **Other Business Processes.** Your Personal Data will be used by our Revenue Manager for customer inventory/statistics, revenue forecasting, rate assessment or adjustment, and for preparation of internal reports (e.g., Profit and Loss Report and Market Segment Production).
- 2.6. **Compliance with Laws.** Your Personal Data may be used to comply with legal and regulatory requirements, responding to court orders and other instructions and requests from any local or foreign authorities including regulatory, governmental, tax, and law enforcement authorities or other similar authorities.



**HOW AND TO WHOM DO WE SHARE
INFORMATION ABOUT YOU?**

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3.1. Your Personal Data may be shared through e-mail or by any other means available by any of our authorized personnel across all companies of the Waterfront Group in the Philippines, as listed below, if deemed necessary for and relevant to our business purpose:

- ▶ Waterfront Cebu City Casino Hotel, Inc.
- ▶ Waterfront Mactan Casino Hotel, Inc.
- ▶ Waterfront Wellness Group, Inc. (CitiGym)
- ▶ Waterfront Entertainment Corporation
- ▶ Davao Insular Hotel Company Inc. (Waterfront Insular Hotel Davao)
- ▶ Acesite (Phils.) Hotel, Inc. (Waterfront Manila Hotel and Casino)
- ▶ Acesite Leisure and Entertainment Corporation

3.2. We may disclose your Personal Data to law enforcement, regulatory, and other government agencies, and to professional bodies and other third parties, as required by and/or in accordance with applicable laws or regulations. This may include disclosures outside the country you are in. As part of our commitment to

protect your Personal Data, we will review the use of your information to determine whether disclosure is required or permitted. We may likewise transfer, store, and/or process your personal data outside the Philippines. In doing so, we will comply with the DPA and its IRR.

3.3. The Waterfront Group ensures that Personal Data shared through e-mail or by any other means available are protected within our information technology (IT) or manual systems and controls are in place to mitigate the risk of data breaches. We ensure that all our employees across the Waterfront Group are well-informed of their responsibilities under the DPA and its IRR, as applicable. Further, we wish to assure you that we do not, and will not, sell Personal Data to any third parties. All our engagements with third parties shall be fully compliant with our obligation of confidentiality imposed on us under the applicable agreements and/or terms and conditions or any applicable laws that govern our relationship with you.



**HOW DO WE STORE AND DISPOSE OF
INFORMATION ABOUT YOU?**

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4.1. We may retain your Personal Data in various forms such as paper file or electronic file. Only authorized personnel and yourself are allowed to access your Personal Data for privacy and security purposes. All Personal Data collected and documented in various official forms/templates of the Waterfront Group will be filed by designated custodians in a locked storage room for the security and protection of your Personal Data. On the other hand, Personal Data in electronic forms will be retained in our computer systems, secured with usernames and passwords where access is limited to authorized employees only.

4.2. We will keep your Personal Data for **three (3) years** from the date of your transaction with us or for as long as the purpose for which it was collected, and such other purposes that you may have consented to from time to time, remains in effect and until such time as it is no longer required nor necessary to keep your information for any other legal, regulatory or business purposes.

Further, we will retain your Personal Data for as long as any unsettled fees still exist.

4.3. ***After the retention period, the Waterfront Group shall no longer be responsible for keeping and providing you with your Personal Data/documents. As authorized, our designated custodian will purge your Personal Data through shredding of paper files and/or deletion of electronic files in our computer system, or in any other manner which would prevent further processing of your Personal Data.***



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WHAT ARE YOUR RIGHTS AS A DATA SUBJECT?

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The Waterfront Group acknowledges your rights as a Data Subject. Thus, customers are entitled to perform any of the following:

- Request for a copy of your Personal Data or access to your Personal Data. The Waterfront Group will provide your request in a commonly portable format (e.g., printed copy of any soft copy files you have requested, photocopy of the document you have requested) within **one (1) month** from the date that the prescribed processing fee is paid. However, the Waterfront Group shall not be required to undertake endless and disproportionate searches for information in order to respond to a request and the Waterfront Group may, in its discretion, refuse to act on your request in the following instances:
 - (i) The relevant Personal Data is not in the Waterfront Group's possession or control;
 - (ii) The request is identical or very similar to the one you previously requested;
 - (iii) The request is obviously unfounded or frivolous; or
 - (iv) Harm would arise or may likely arise from disclosure (e.g., if disclosure would likely prejudice a criminal investigation or prejudice someone's commercial interests).

In case your request is declined, we will provide you with a formal notification indicating the grounds for declining your request.

- Request for the correction/rectification or deletion of your Personal Data, provided that the Personal Data are necessary neither for compliance with a regulatory obligation nor to establish, exercise, or defend legal claims.
- Object to or restrict the processing of your Personal Data, provided that Personal Data requested for restriction are necessary neither for compliance with a regulatory obligation nor to establish, exercise, or defend legal claims. This right may be exercised upon discovery and substantial proof that Personal Data was obtained or processed unlawfully.
- File a complaint with the NPC if any of the DPA provisions regarding security of your Personal Data, including your rights as Data Subjects, are violated.

For a detailed discussion on your rights as Data Subjects and how can you exercise them, you may visit the NPC's official website at <https://privacy.gov.ph/>.



WHAT HAPPENS IN CASES OF PERSONAL DATA BREACH?

In the event your Personal Data is breached, we are prepared to follow the applicable data breach notification procedure provided for under the DPA and its IRR, which requires, among others, the immediate reporting of a data breach to the NPC and affected Data Subjects and the documentation of security incidents and Personal Data Breaches through written reports (including those not covered by the notification requirements).

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WHAT IS THE EFFECT OF AMENDMENTS MADE TO THIS STATEMENT?

We may amend and vary this Statement from time to time, which shall have the effect of superseding the same. Upon notification of an amended Statement, the contents thereof shall similarly amend, vary, and supplement such terms and conditions, agreements and/or arrangements aforesaid with effect from the date specified in such amended Statement, and without prejudice to the foregoing, your use or continued use of any of the Waterfront Group's services after such change shall also be deemed as your acceptance and agreement to the same. We will inform you of any changes in our privacy policy through e-mail.



WHERE DO I GO FOR FURTHER INFORMATION?

If you have questions regarding our data privacy policies or for more information on the above Statement, you may address them to our Data Protection Team as follows:

ATTN: **Mr. Jason Lim**
Data Protection Officer
j.lim@waterfronthotels.net

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