

# Corporate Privacy Policy

**CHROMA HOSPITALITY, INC.** is committed to ensuring the protection and security of the personal information and sensitive personal information (collectively referred to herein as “personal information”) provided to us by our guests and clients. As part of our commitment, we are dedicated in promoting the culture of privacy consistent with the Republic Act No. 10173 or the Data Privacy Act of 2012, its implementing rules and regulations, related administrative issuance and other applicable laws. We at **CHROMA HOSPITALITY, INC.** collect and process your personal information only in strict adherence to the principles of transparency, legitimate purpose and proportionality.

## Data Collection

**CHROMA HOSPITALITY, INC.** collects your personal information from various channels. By voluntarily providing your personal information, you confirm your understanding of and agreement with the collection and processing of your personal information in accordance with this Privacy Policy Statement.

From our online bookings and reservations channels, to our sales representatives, to our registration forms all of which are designed to collect only the necessary information we need for us to provide the best and most personalized products and services for our guests and clients.

The personal information we collect, includes but are not limited to:

1. Full name;
2. Email address;
3. Valid government-issued ID (i.e., passport, driver’s license);
4. Special Requests or Preferences (i.e., dietary requirements);
5. Country of origin;
6. Complete residential and/or mailing address;

7. Contact information (e.g. mobile number and telephone number);
8. Information relating to minor companion / child details (for CRIMZONE members);
9. Special occasion being celebrated (e.g. birthday, anniversary, etc.)
10. Other information you might find helpful or necessary for us to provide you personalized services (remarks/notes); and
11. Payment Information (Credit Cards, Debit Cards, Bank Transfers).
12. Other information necessary to provide you personalized products and services

Aside from the general purpose for the collection of personal information mentioned above, your personal information is likewise collected and processed for the following related purposes:

1. Process your bookings, payments and transactions with us.
2. To identify you and your party during the duration of your stay with us.
3. To ensure your safety and security during the duration of your stay with us.

## Sharing and Disclosure

**CHROMA HOSPITALITY, INC.** shall hold your personal information in strict confidence. However, **CHROMA HOSPITALITY, INC.** may disclose and share your personal information as may be reasonably necessary and only for the purposes set out in this Policy to the following third-party partners:

1. Subsidiaries and/or affiliates of **CHROMA HOSPITALITY, INC.** within the Filinvest Group;
2. Other hotels operated under the Chroma Hospitality portfolio;
3. Third party service providers such as but not limited to:
  1. Manpower services/agencies
  2. Information Systems providers
  3. Security Agencies; and
4. Contractors and Sub-contractors.

To further protect and secure all personal information, **CHROMA HOSPITALITY, INC.** only shares and discloses personal information to entities that observe a high standard of confidentiality and data privacy protection, in compliance with the Data Privacy Act of 2012 and such other applicable laws.

## Retention

**CHROMA HOSPITALITY, INC.** shall keep a copy of your personal information for a maximum of two (2) years after completion of our transaction with our guests and clients, unless we believe that further retention of such personal information is necessary to any ongoing or prospective legal proceedings or as may be required to do so by law or any government agency.

## Use of Cookies

Our website uses “Cookies” to identify the areas of our website that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We use Cookies to personalize the content that you see on our website. Most web browsers can be set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access the full functionality of our website.

## Protection and Security Measures

**CHROMA HOSPITALITY, INC.** is fully committed in protecting your personal information and sensitive personal information. As such, we have taken all the necessary technical, organizational and physical measures to protect the confidentiality and security of your

personal information and sensitive personal information against accidental loss or destruction, and human dangers such as misuse, unlawful access, fraudulent misuse, unlawful destruction, alteration and contamination. Towards this end, we have put in place the following safeguards:

1. Storing physical documents containing your personal information, in a secure storage facility equipped with security tools;
2. Storing and processing your personal and sensitive personal information in secure operating environments that are not accessible to the public and is only accessible by authorized personnel;
3. Disposing documents containing personal and sensitive personal information through shredding or other similar methods of disposal that would ensure the impossibility of further processing, unauthorized access or disclosure of your personal information.

## **Additional Measures Added to Ensure the Safety and Security of Our Guests and Staff:**

As of March 2020, Chroma Hospitality Inc. has implemented additional measures to ensure the health and safety of our staff and guests. A part of these additional measures is having our guests sign a "HEALTH AND TRAVEL DECLARATION SURVEILLANCE FORM". This form requires our guests to provide us the necessary information that allows us to ensure the health and safety of our guests and staff. The information are but not limited to:

1. Travel history with inclusive dates, such as country of origin and arrival dates here in the PHILIPPINES
2. Contact or interaction with people from their originating country/ies.
3. Arrival date/time here in the PHILIPPINES (with supporting document/s)

4. Contact or interaction with people who were PULs, PUMs and/or confirmed COVID-19 cases.
  - a. IF YES, contact tracing information is also mandatory.
5. Pre-existing medical conditions, signs and/or symptoms relating to COVID-19
6. Medication/s taken for those declared above.

All information collected through these forms will only be for the use of ensuring the health and safety of our guests and staff. The information will only be shared to those government agencies identified by the DEPARTMENT OF HEALTH to handle any COVID-19 related incidents.

You may also refer to the joint memorandum circular (DOH and NPC) for the guidelines for the processing and disclosure of COVID-19 related data:

To exercise your rights as a data subject to access, modify, erase and object to processing of your personal information, you may withdraw consent hereto; and send your request for the correction or deletion of your personal information to:

## **Data Privacy Manager**

CHROMA HOSPITALITY INC.,  
[DPO@CHROMAHOSPITALITY.COM](mailto:DPO@CHROMAHOSPITALITY.COM)

## **Requests for Correction and Deletion of Your Personal Information:**

FILINVEST GROUP  
[DPO.ALABANGOCRIMSONHOTEL.COM](mailto:DPO.ALABANGOCRIMSONHOTEL.COM)

