

## **PRIVACY NOTICE**

### **IMPIANA KLCC HOTEL**

#### **PERSONAL DATA PROTECTION ACT 2010 (ACT 709)**

### **GUEST INFORMATION**

At Impiana KLCC Hotel we stress the importance of privacy and are committed to earning the trust of our guests by adopting high standards for the protection of personal information.

Our policy outlines the type of personal information we collect and receive, the circumstances in which we collect or receive personal information, the policies and procedures we have established outlining its use and storage, and for sharing certain types of personal information in certain limited circumstances, the procedures you should follow if you have any questions or requests in respect of your personal information or our policies and procedures and the person to whom such questions or requests should be directed, and the means by which to communicate with that person.

In this policy, personal information means information about you that is personally identifiable like your name, address, e-mail address or phone number, and that is not otherwise publicly available and is not part of your work identification.

It also includes information on guest preferences and usage, when such information is supplied to or recorded by Impiana KLCC Hotel in the course of transacting business with an individual.

### **HOW YOU MAY PROVIDE US YOUR PERSONAL INFORMATION**

- By making a reservation or by using Impiana KLCC Hotel services.
- By registering with Impiana KLCC Hotel's booker program, Impiana Golden Wave Club (iGWC) and any future loyalty programs.
- By providing it to us in communications regarding service delivery such as comment cards.
- By providing the information to us by participating in a marketing initiative.
- By visiting our website.

Below we will outline the type of information normally collected in each of these circumstances, the reasons for doing so, how we will use it and store it.

### **MAKING A RESERVATION**

When making a reservation or using Impiana KLCC Hotel services it is necessary for us to have your information in order to identify you, contact you and to process your purchase and requests. This information usually includes your name, age, gender, NRIC or Passport details, residential address, phone number, e-mail address, credit card number and expiration date, language preference etc. It may also include, if you choose to share that information with us, your preferences regarding the delivery of your service such as type of room, type of bed, and the like. You may wish to have your purchase of Impiana KLCC Hotel's services recognized in a third party's loyalty program with which Impiana KLCC Hotel has a relationship. To do so, we will require you to provide us with certain verification information such as your membership number

in the third party program. We also offer special discounts from time to time that may have qualifying criteria. Sometimes we offer special offers to, for example, seniors or for children. To assess your eligibility and process your reservation correctly, we need to record your date of birth at the time of booking. You may be required to provide personal identification with your date of birth in order to verify this upon check-in.

From time to time, we offer packages or other services that involve third parties. If you are partaking in such a package or service, your personal information will be shared with that third party to the extent necessary to provide that service and process the purchase or request.

Impiana KLCC Hotel may use the information you provide to send you offers and information about Impiana KLCC Hotel services and those of select third parties. Your information will not be given to these third parties but rather the offer of the third party will be provided to Impiana KLCC Hotel which will manage the distribution.

If you do not wish to receive such offers and information you may unsubscribe or opt-out by sending an email to [info.klcc@impiana.com](mailto:info.klcc@impiana.com), using the subject line "Unsubscribe", so indicating your request with sufficient personal identifiers so we can appropriately act on your request. All our marketing communication of this type will also contain instructions for unsubscribing.

#### **REGISTERING WITH IMPIANA KLCC HOTEL'S BOOKER PROGRAM, IMPIANA GOLDEN WAVE CLUB (iGWC)**

As a customer of Impiana KLCC Hotel you have the opportunity to belong to its booker program, iGWC. This program is designed to deliver a higher level of personalization and service, additional personal information will be required. Membership is voluntary and upon invitation. By choosing to enrol you have consented to the supply of and use of your personal information as more particularly outlined in these programs' Terms and Conditions. Please click [here](#) to view the Terms and Conditions.

#### **INFORMATION PROVIDED TO US IN COMMUNICATIONS REGARDING SERVICE DELIVERY SUCH AS COMMENT CARDS**

Information provided to us in such a fashion will be used solely for the purpose of recording your comments, communicating with you in respect of them, reviewing them with the subject hotel and hotel personnel, for the purposes of recognizing employees for excellence of service delivery and for developing improvements in service delivery.

#### **IMPIANA KLCC HOTEL OFFERS YOU THE ABILITY TO RECEIVE TARGETED, TIMELY NOTIFICATION OF TIME SENSITIVE OFFERS**

To sign up for this service we require you to provide us with your e-mail address, first name, last name, language preference, and country of residence. You may unsubscribe at any time using the link provided on every e-mail message and you will no longer receive e-mail offers and promotions for the specified subscription or website, as the case may be. You may at any time in the future opt-in to receive e-mail offers.

#### **BY VISITING OUR OFFICIAL WEBSITE**

We use "cookies" on our website. Cookies are pieces of information that an Internet site transfers to your hard drive for record-keeping purposes. The use of cookies is an industry standard – you'll find them almost everywhere on the Internet. Impiana KLCC Hotel uses cookies to recognize visitors when they return to our site.

We may also evaluate our content and services and tailor our websites, for visitors, based on other information we collect such as IP addresses, which are numbers assigned to your computer whenever you use the Internet, pixel tags (or clear gifs), and the type of Internet browser or operating system you are using. This information is collected in the aggregate, but we may tie it to your personal information through cookie use as described above.

Besides that, for your information data collection is the process of gathering and measuring information on variables of interest, in an established systematic fashion that enables one to answer stated research questions, test hypotheses, and evaluate outcomes. The data collection component of research is common to all fields of study including physical and social sciences, humanities, business, etc. While methods vary by discipline, the emphasis on ensuring accurate and honest collection remains the same: The importance of ensuring accurate and appropriate data collection. Regardless of the field of study or preference for defining data (quantitative, qualitative), accurate data collection is essential to maintaining the integrity of research. Both the selection of appropriate data collection instruments (existing, modified, or newly developed) and clearly delineated instructions for their correct use reduce the likelihood of errors occurring.

#### **WHY WE COLLECT PERSONAL INFORMATION**

- **To establish and maintain a responsible commercial relationship with you and to provide ongoing service.**
- **To understand your needs and preferences.** We maintain a record of the products and services you receive from us and we may ask for additional information so that we can serve you better. For example, we may record your preference for type of room.
- **To develop, enhance, market or provide products and services.** For example, we look at our guests' use of our services so that we can better understand how to improve our services.
- **To manage and develop our business and operations.** For example we analyse guest patterns of usage of our hotels and services to help us manage them efficiently and plan for future growth.
- **To meet legal and regulatory requirements.**

#### **WHEN DO WE DISCLOSE PERSONAL INFORMATION**

We disclose personal information only in these limited circumstances:

- We may disclose a guest's personal information to a person who, in the reasonable judgment of Impiana KLCC Hotel, is seeking the information as an agent of the guest – for example, a travel agent who is booking a reservation on behalf of the guest.
- Personal information will be shared with other Impiana hotels in Malaysia, Thailand and Indonesia for which your reservation has been made so that they may provide the services you have reserved.

- Personal information may be shared with other Impiana hotels in Malaysia, Thailand and Indonesia so that they may better provide services to you in the event you wish to travel to that property in the future.
- Personal information will be shared with a third party involved in supplying the guest with the services they have purchased to the extent necessary to effect the supply and the processing of the transaction.
- Personal information may be shared with a third party retained by Impiana KLCC Hotel to perform functions on its behalf such as reservations handling, data processing or storage, guest surveys or research.
- Personal information may be shared with an agent retained by Impiana KLCC Hotel to evaluate a customer's credit worthiness or in order to collect a customer's account.
- Personal information may be shared with a public authority or an agent of public authority if in the reasonable judgment of Impiana KLCC Hotel it appears that there is an imminent danger to life or property which could be avoided or minimized by disclosure of the information, or which disclosure is compelled by legal authority.

Any such disclosure of a guest's personal information by Impiana KLCC Hotel to a third party will be made only on a confidential basis conditioned upon the information being used only for the purpose for which it has been disclosed.

Further if you were to share with us your sensitive personal data (data relating to your physical or mental health, religious affiliation, the commission or alleged commission of offenses etc.) we will only collect, use or process your sensitive personal data to provide the service(s) you signed up for in accordance with your express consent. You have the choice, at any time, not to provide your sensitive personal data or to revoke your consent. However, failure to provide such sensitive personal data or revocation of your consent may result in us being unable to provide you with effective and continuous service.

#### **HOW DO WE PROTECT YOUR DATA?**

The security of your personal data is our priority. Impiana KLCC Hotel takes all physical, technical and organisational measures needed to ensure the security and confidentiality of personal data. If we disclose any of your personal data to our authorised agents or service providers, we will require them to appropriately safeguard the personal data provided to them.

#### **HOW LONG MAY WE RETAIN YOUR PERSONAL DATA?**

We will only retain your personal data for as long as necessary to fulfil the purpose(s) for which it was collected or to comply with legal, regulatory and internal requirements. Afterwards we will destruct or permanently delete your data.

#### **CHANGES TO THIS PRIVACY NOTICE**

Please note that we may update this Privacy Notice from time to time. If there are material changes to this Privacy Notice, we will notify you by posting a notice of such changes on our website or by sending you a notification directly. Do periodically review this Privacy Notice to

stay informed on how we are protecting your information. This Privacy Notice was last updated in **December 2016**.

#### **HOW CAN YOU ACCESS / CORRECT / UPDATE YOUR PERSONAL DATA?**

We are committed to ensure that the personal data we hold about you is accurate, complete, not misleading and up-to-date. If there are any changes to your personal data or if you believe that the personal data we have about you is inaccurate, incomplete, misleading or not up-to-date, please contact us so that we may take steps to update your personal data.

You have the right to access your personal data. If you would like to request access to your personal data, please contact us. Please note that depending on the information requested we may charge a small fee. We may also take steps to verify your identity before fulfilling your request for access to your personal data.

You may also withdraw your consent with respect to the use of your personal information for marketing purposes at any time, subject to legal or contractual restrictions and reasonable notice.

#### **HOW MAY YOU CONTACT US?**

If you need to contact us, you directly contact

**PDPA Officer**

**Executive Office, Level 3**

**Impiana KLCC Hotel**

**13 Jalan Pinang 50450 Kuala Lumpur, Malaysia**

**Tel : 03-2147 1111 ext. 3315**

**Email : [info.klcc@impiana.com](mailto:info.klcc@impiana.com)**

**Website : [www.impiana.com](http://www.impiana.com)**

We provide the Privacy Notice in both English and Bahasa Malaysia. In case of any inconsistencies between these two, the English version shall prevail.