



## The Scarlet Huntington Privacy Policy

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Welcome to the website (this "Site") of The Scarlet Huntington ("Scarlet", or "we", "our" and "us" hereinafter). By accessing and using this website (the "Site") of The Scarlet Huntington, you acknowledge that you have read, understood, and agreed, without limitation or qualification, to accept and abide by the **The Scarlet Huntington Privacy Policy (the "Policy")**, which shall take effect immediately on your first use of this Site.

**If you do not agree to be legally bound by the following Privacy Policy, please do not access and/or use the Site.**

The Scarlet Huntington respects the privacy of all its customers and partners, and treats personal information provided to us as confidential. We pledge to comply with the requirements of European Union's General Data Protection Regulation (GDPR), and use your personal data and information only for the reasons stated in the Privacy Policy.

### **Application**

This Privacy Policy (the "Policy") applies to personal data and information regarding guests and other individuals with whom we do business and to the management of that data and information in any form, whether electronic or written.

Additional terms and conditions applicable to specific areas or sections of this Site or to particular content or transactions may also be posted in such other areas or sections of this Site, and shall govern your access and usage of the Site and Services provided.

I understand and acknowledge that Scarlet may be unable to provide products or services to me if I withhold or withdraw my consent for Scarlet to collect, use or disclose my personal data for such purposes.



## **Collection**

The term "personal data" in this Policy refers to personal information which is capable of identifying you as an individual. You can visit our website without providing any personal data or information. The collection and processing of personal data may be obligatory for purposes of providing you with our services.

Personal data may be supplied by you or collected from you as part of: (i) fulfilling reservations or requests for information or services, (ii) accommodating your personal preferences, (iii) purchasing our products or services, (iv) registering for our program memberships, newsletter and (v) facilitating communications.

### **The types of personal data that we process include:**

- your personal details such as name, national identification number, age, sex, nationality, contact information, passport and visa information and other required information pursuant to local laws and regulations;
- guest stay information, including your previous stay history, date of arrival and departure, goods and services purchased, special requests made, observations about your service preferences, telephone numbers dialled, faxes and telephone messages received from third parties on behalf of guests/customers;
- your credit card details, company information, account details, profile or details and any frequent flyer or travel partner programme affiliation;
- any information necessary to fulfil special requests (for example, leisure, travel and guest preferences);
- your comments, reviews, feedback and/or opinions about our goods, services and/or staff;
- information such as videos and photographs collected through the use of closed circuit television systems, security systems; and event and activities photography and videography organised by Scarlet, within and/or outside of premise of Scarlet.

## **Use**

We may use and disclose relevant portions of your personal data and information in order to:

- process, confirm and/or charge for the room accommodations, amenities arrangements and other goods and services you purchase;
- process and administer customer relationship management programmes (e.g. in house printed circulars, notifications and updates for in-house goods and services, e-mailers to update you on latest Scarlet news and promotions);
- fulfil goods and service obligations to you, or anyone involved in the process of making your travel, accommodation and other service arrangements (e.g. travel agents, group travel organisers and your employer) and vendors (e.g. credit card companies, airline operators, laundry service providers, baby-sitting services, airport transfers, and other similar programmes);
- provide customer relationship management (e.g. sending you thank you emails after your stay)
- conduct market analysis, market research, customer satisfaction and quality assurance surveys;
- provide for the safety and security of guests and compliance with security standards;
- administer general record keeping and reporting;
- disclose the winner of contests and lucky draw competitions conducted by us or on our behalf;
- meet legal and regulatory requirements.



## **Disclosure**

From time to time, we may disclose and transfer your personal data and information (whether within or outside of United States) to our service partners, travel-related companies (for example, airline companies, car rental companies and excursion tour companies), and business partners and third party data processors who provide administrative, telecommunications, payment or other services to Scarlet to facilitate your requests or provide you with goods and services you require and for the purposes described under the section “Use”. The recipients of any such data are contractually prohibited from using personal data and information for any purpose other than for the purpose(s) Scarlet specifies.

We reserve the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting, tax rules and regulations and any specific record retention laws. We may share aggregated demographic information with business partners, affiliates or other entities. This aggregate information is not linked or traceable to any personally identifiable information about you.

Except as described herein, we do not permit the sale or transfer of personally identifiable information to third parties.

## **Access and Correction**

You are entitled to access and make changes to any personal data relating to your profile held in our database. You should update the personal data held by us whenever there is a change. If you have any questions about this Policy, or if you would like to submit a request for access to or change of the personal data and information that we maintain about you, please contact our Data Protection Officer via the information indicated under the “Contact Us” section.

We reserve the right to charge a fee for the processing of any such access request, depending on the extent of personal data required. As indicated above, all requests for access to your personal information must be submitted in email or writing, using the contact details indicated under the “Contact Us” section.

When communicating your request, please be sure to include your full name, email and telephone number, and specify clearly the type of enquiry, the original source of data collection and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information, we may require to make that determination.

## **Data Security & Retention**

To maintain the accuracy of your personal data, as well as preventing unauthorised access to and ensuring the correct use of your personal data, we have carried out appropriate physical, electronic and managerial measures to safeguard and secure the personal data we collect. These measures are subject to ongoing review and monitoring. Whilst we make every effort to protect your personal data, no security measures can guarantee that your personal data and information will not be subject to interference, misuse or hacking and we shall not be responsible for any loss, misuse or alteration arising as a result of such incidents.



Scarlet will take reasonable efforts to protect your personal data in our possession against unauthorised access, collection, use, disclosure, copying, modification and disposal. We will retain your information for a reasonable period, until you request otherwise, and/or as long as the law requires.

### **Contact Us**

If you have any questions about this Policy, or any concerns with regard to the administration of the Policy, or if you would like to submit a request for access to the personal information that we maintain about you, and or to withdraw your consent for receiving marketing related information on services and promotions from Scarlet, please contact us by any of the following means:

By email to: [conciierge@thescarlethotels.com](mailto:conciierge@thescarlethotels.com)

By mail to :

**The Scarlet Huntington**  
**1075 California Street San Francisco, CA 94108**  
**Attn: Data Protection Officer**

### **Email Marketing**

We intend to use your personal information (including your name and email address) to send you marketing communications via email, containing news, latest promotions and events to be offered by us or by our business partners in relation.

We will not use your personal information for email marketing without your consent. We will always ask for your consent before we use your personal information for email marketing. You may opt-out from receiving email marketing communications at any time, free of charge, by following the “opt-out” instructions contained in the communications or contacting Scarlet in accordance with the section “Access and Correction”.

### **Minors**

At Scarlet, we do not knowingly collect personal information nor solicit services or products to children or minors. As a parent or guardian, please do not allow your children (or any minor under your care) to submit any personal information to Scarlet.

### **Anonymous Browsing**

Visitors to our website [www.thescarlethotels.com](http://www.thescarlethotels.com) do so on an anonymous basis. We have not configured our website to collect any information from your computer without your input. This means that unless you voluntarily and knowingly provide us with information, we will not know your identity, your email address, or any other information identifiable to you.

### **Cookies**

To enhance your experience on our web site, some of our web pages may use "cookies." Cookies are text files that we place in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally-identifiable information unless you choose to provide this information to us by, for example, registering for one of our services. However, once you choose to furnish the site with your personally-identifiable information, this information may be linked to the data stored in the cookie. We use cookies mainly to understand site usage and to improve the content and offerings on our sites.



## **Choice**

You may always choose what personal data and information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected. We will abide by any request from you not to send you direct marketing materials. When such a request is received, your contact details will be “suppressed” rather than deleted. This will ensure that your request is recorded and retained unless you provide a later consent that overrides it.

## **Changes to the Policy**

We reserve the right in our sole and absolute discretion to modify, amend or vary the following Privacy Policy without giving any prior notice by posting the changes on this Site. Any modifications, amendments or variations shall be effective immediately upon posting to the Scarlet Site. Use of the website following such changes constitutes your acceptance of the revised Policy then in effect. Updated versions of our Policy will include the date of the revision at the end of this Policy so that you are able to check when the Policy was last amended.

Any changes to our Policy will become effective upon posting of the revised Privacy Policy on the website.

## **Links to Third Party Websites**

This site may contain links to other websites. Such links or third party websites are neither maintained nor controlled by Scarlet. If you use these links or access such websites, you will leave this Site. Such links do not constitute or imply an endorsement, sponsorship, or recommendation by us of the third party, the third party web site, or the information contained therein. You should note that any data that you provide to the third party sites are not subjected to The Scarlet Huntington Privacy Policy and Terms of Use, and we strongly recommend that you be aware of the privacy and security practices employed by these other websites.

## **Disclosure to Third Party**

Scarlet may engage third parties to assist in the provision of service by us to you and which may, as part of their role in delivering the service, process your personal data. As part of using service provided by Scarlet, you consent to us sharing your personal data with the following parties:-

- agents, other service providers and third party partners who process and store personal data and information;
- professional advisors;
- law enforcement agencies;

Scarlet maintains a list of all third parties that may process your personal data. All third parties are required to abide by the same obligations as Scarlet under this Privacy Policy. Unless otherwise described elsewhere in this Privacy Policy, we do not disclose, sell or trade any to any of your personal data and information to third parties.

In some cases, third parties may be directly collecting your personal data from you on our behalf. If third parties provide your personal data to Scarlet, Scarlet shall mention what personal data and information that third parties provide to Scarlet on the list that Scarlet keep of its third parties. We inform our third parties that they are not permitted to use your personal data they obtain from us other



than to provide the service for us. We are not responsible for any additional information you provide directly to these third parties.

From time to time, we may also share your personal data with third parties when you give us your explicit consent to do so. For example, we may enter into relationships with other parties to make specific services or offers available directly to you. If you opt-in to these third party services or marketing offers, we may share the personal data you provide at the time of sign-up or such other personal data, such as your name or other contact information, that we deem reasonably necessary or appropriate for our business partner to provide these services or offers or get in contact with you.

We may disclose your personal data in the good faith belief that we are lawfully authorized or required to do so, or that doing so is reasonably necessary or appropriate to comply with the law or with legal process or authorities, respond to any claims, or to protect the rights, property or safety of Scarlet, our users, our employees or the public, including without limitation to protect Scarlet or our users from fraudulent, abusive, inappropriate or unlawful use of our service. Scarlet will promptly notify you of any request of an executive or administrative agency or other governmental authority that it receives and which is related to your personal data and information, unless prohibited by applicable law. Scarlet will provide you with reasonable information in its possession that may be responsive to the request as stated above, and any assistance reasonably required for you to respond to the request in a timely manner. You acknowledge and agree that Scarlet has no responsibility to interact directly with the entity making the request.

Please note that nothing herein restricts the sharing of aggregate information, which may be shared with third parties without your consent.

### **Choice of Law and Jurisdiction**

This Policy shall be governed by and be construed in accordance with the laws of the Republic of Singapore. This Policy is written in the English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this Policy, the English version shall prevail.

Last update as of 25 May 2018.