

PERU ANNEX
PERSONAL DATA PROTECTION AND PROCESSING POLICY - PERU

1. Applicable Regulations

It means: (i) the Political Constitution of Peru, which provides that computer services, computerized or not, public or private, must not provide information that affects the personal and family privacy of people, (ii) the Personal Data Protection Law – Law 29733 of 2011, and its regulations, approved by Supreme Decree 003-2013-JUS, (iii) the Information Security Directive administered by Personal Data Banks approved by Directorial Resolution No. 019-2013-JUS-DGPDP, (iv) the Peruvian Technical Standard NTP-ISO/IEC 27001 2014 on Security Techniques in Information Security Management Systems, (v) Directive No. 01-2020-JUS/DFTAIPD that regulates the processing of Personal Data through Video Surveillance Systems, and any other provision that modifies, complements, repeals or replaces the aforementioned.

2. Definitions

Personal Data Bank: Means the organized set of Personal Data, automated or not, regardless of the support found, whether physical, magnetic, digital, optical or others that are created, whatever the form or modality of its creation, formation, storage, organization. and access

Authorization for the Processing of Personal Data: It means any technical operation or procedure, automated or not, that allows the collection, registration, organization, storage, conservation, elaboration, modification, extraction, consultation, use, deletion, communication by transfer or dissemination or any other form of processing of the data. Personal information.

Processing of Personal Data of girls, boys and/or adolescents: For the Processing of Personal Data of a minor, the consent of the holders of parental authority or guardians, as appropriate, will be required.

3. Responsible (owner) of the Personal Data Bank

GHL Perú SAC

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- Address: Calle Pancho Fierro No. 194, District of San Isidro

Holding Hotelera GHL SAS

- NIT: 901580112 2
- Central Office: Calle 72 # 6-30, Bogotá – Colombia
- Telephone: +57 3139333

4. Responsibility of the owner of the Personal Data Bank:

- 5.1. Grant and maintain a sufficient level of protection to the Personal Data contained in the Personal Data Bank under its ownership.
- 5.2. Determine and fulfill the purpose and content of the Personal Data Bank under its ownership.
- 5.3. Process the Personal Data contained in the Personal Data Bank under its ownership.
- 5.4. To guarantee compliance with the rights of the Owner conferred in Law No. 29733, Personal Data Protection Law.

The Controller (owner) of the Personal Data Bank is responsible for the Processing of Personal Data that it stores in its Personal Data Bank.

5. Responsibility of the Person in Charge of the Personal Data Bank:

The Processor carries out the Treatment following the guidelines and using the means designated by the Controller (owner) of the Data Bank. Likewise, the Processor must assist the person responsible at his request, to ensure that all obligations regarding the protection of Personal Data are met.

6. Types of Personal Data Banks and Purposes of Treatment

The Personal Data Banks indicated above will be registered in the National Registry for the Protection of Personal Data administered by the National Authority for the Protection of Personal Data. The person responsible (owner) of the Personal Data Bank may determine the registration of other Personal Data Banks.

7. Transmission of Personal Data and Cross-border Flow of Personal Data

The transmission of Personal Data is carried out to the Person in Charge of Personal Data Processing, GHL PERÚ SAC, in its capacity as administrator and hotel operator. GHL PERÚ SAC is part of the GHL HOTELES group, which operates various hotels in Peruvian territory and in various countries worldwide.

As part of a business group that operates hotels worldwide, Personal Data may be transmitted outside the national territory, even in countries that may not offer an equivalent level of data protection. However, we will ensure that any transfer of Personal Data complies with the Applicable Regulations to guarantee the security and protection of the information, in accordance with the provisions of Law No. 29733 and applicable provisions.

To facilitate travel, it may be necessary to disclose and process Personal Data for immigration, border control, security and anti-terrorism purposes, or other purposes determined appropriate by government authorities at the points of departure and/or destination. Some countries require passenger details to be provided in advance to allow travel. In compliance with Applicable Regulations, if we are legally authorized, we may share the minimum necessary personal data with the competent authorities.

9. Detail of Obligations in relation to the Processing of Personal Data

GHL recognizes that Personal Data is the property of the people to whom it refers and that only they can decide about it. In this sense, you will use them only for those purposes for which you are duly authorized, and in all cases respecting the Applicable Regulations.

In accordance with the provisions of Article 28 of Law 29733, we undertake to permanently comply with the following obligations:

- (i) Carry out the Processing of Personal Data, only with prior informed, express and unequivocal consent of the owner of the personal data, except by authoritative law, with the exception of the cases set forth in article 14 of Law 29733.
- (ii) Do not collect Personal Data by fraudulent, unfair or illicit means.
- (iii) Collect Personal Data that is updated, necessary, relevant and appropriate, in relation to the specific, explicit and lawful purposes for which it was obtained.
- (iv) Do not use the Personal Data being processed for purposes other than those for which it was collected, unless an anonymization or dissociation procedure is involved.
- (v) Store Personal Data in a way that makes it possible to exercise the rights of its Owner.
- (vi) Delete and replace or, where appropriate, complete the Personal Data being processed when you become aware of its inaccurate or incomplete nature, without prejudice to the rights of the Owner in this regard.
- (vii) Delete the Personal Data subject to processing when they are no longer necessary or relevant to the purpose for which they were collected or the period for their processing has expired, unless an anonymization or dissociation procedure is involved.
- (viii) Provide the National Authority for the Protection of Personal Data with the information related to the Processing of Personal Data that it requires and allow it access to the Personal Data Banks that it manages, for the exercise of its functions, within the framework of an administrative procedure in course requested by the affected party.
- (ix) The others established in the Applicable Regulations.

10. Validity and changes

This Annex to the personal data processing policy is approved on May 22, 2024, the date from which it is applicable.

This Policy may be modified by GHL when required without prior notice, provided that they are non-substantial modifications. Otherwise, they will be previously communicated to the Owners.