

# PLAZA PREMIUM GROUP

Last Updated: July 2023

## 1. Important Notice

### **IMPORTANT:**

Plaza Premium Group manages and operates a wide range of airport hospitality and ancillary passenger services under various brands, including but not limited to “Plaza Premium Lounge”, “Plaza Premium First”, “Airport Dining”, “ALLWAYS”, “Aerotel” and all associated brands of Plaza Premium Group, are committed to protecting and respecting the privacy of our Customers. This privacy policy (“**Privacy Policy**”) sets out what information Plaza Premium Group collects and how we use it. For the purpose of this Privacy Policy, any reference to “we”, “us” or “our” shall mean Plaza Premium Group. In this Privacy Policy:

“**Aerotel**” refers to the group of airport transit hotels owned, managed and/or operated by any company of Plaza Premium Group under the brand “Aerotel” or other associated brands of Plaza Premium Group;

“**Affiliate**” or “**Affiliates**” means (a) in relation to a company, any subsidiary of that company, any holding company of that company, any other subsidiary of any such holding company and any company over which that company or any such holding company has Control; and (b) in relation to an individual, any company over which that individual has Control and any subsidiary of that company, any holding company of that company, any other subsidiary of any such holding company and any company over which that company or any such holding company has Control at the date of this Privacy Policy;

“**Airport Dining**” refers to the food and beverage outlets owned, managed and /or operated by Plaza Premium Group under the brand “Root 98”, “Flight Club”, “Lee Fa Yuen Express”, “Terrace Chinese Kitchen”, “TGM” or other associated brands of Plaza Premium Group as may be amended by Plaza Premium Group from time to time;

“**ALLWAYS**” refers to the airport meet and greet, porterage, any other arrival, transit and departure hospitality services and/or any airport passenger services, managed and/or operated by Plaza Premium Group under the brand “ALLWAYS” or other associated brands of Plaza Premium Group;

“**Control**” of a person means the power or authority, whether exercised or not, to direct the business, management and policies of such person, directly or indirectly, whether through the ownership of voting securities, by contract or otherwise, which power or authority shall conclusively be presumed to exist upon possession of beneficial ownership or power to direct the vote of more than 30% of the votes entitled to be cast at meetings of the members or shareholders of such person or power to control the composition of a majority

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of the board of directors of such person; the terms “Controlling” and “Controlled” shall be construed accordingly;

“**Customer**” means any person who uses the Services and shall include a passenger in a Location;

“**Data**” refers to any representation of information (including an expression of opinion) in any document, and includes a personal identifier;

“**Data Protection Laws**” means the EU General Data Protection Regulation 2016/679 as amended, replaced or superseded from time to time, together with any applicable data protection laws and regulations from time to time in force;

“**Location**” means a location where the Services are offered to Customers and includes an airport or such location where a lounge of Plaza Premium Group is located;

“**Order**” means your order for the Services to us as set out in our authorised an order form or booking form or such other booking method as determined by us from time to time;

“**Personal Data**” refers to data (a) which relates directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in forms which access to or processing of the data is practicable.

“**Plaza Premium Group**” means Plaza Premium Lounge Management Limited and/or any of its Affiliates and shall include its authorised personnel or representative;

“**Services**” means the services which are stated on any one of the Website supplied by us to you including without limitation Plaza Premium Lounge and Plaza Premium First services, ALWAYS meet & greet services, Aerotel services, Airport Dining services and any other airport passenger services in a Location which may be revised, updated, varied, modified or amended by us from time to time at our sole discretion;

“**Supplier**” refers to any individual, business entity or party engaged or appointed by Plaza Premium Group to provide relevant products and/or Services, to support the operation, legal, marketing, communication and other essential business functions of Plaza Premium Group in connection with the Services;

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“**Website**” refers to an online website(s) as may be adopted by Plaza Premium Group to provide the Services, including but not limited to the following subject to change from time to time:

- (a) [www.plazapremiumgroup.com](http://www.plazapremiumgroup.com);
- (b) [www.plazapremiumlounge.com](http://www.plazapremiumlounge.com);
- (c) [www.myaerotel.com](http://www.myaerotel.com);
- (d) [www.allwaysvip.com](http://www.allwaysvip.com);
- (e) [www.airport-dining.com](http://www.airport-dining.com);
- (f) [www.plazapremiumfirst.com](http://www.plazapremiumfirst.com); and
- (g) all associated websites, including microsites of Plaza Premium Group relating to a Location.

In this Privacy Policy, words denoting one gender shall include the other gender and the neuter and vice versa, and words denoting the singular number shall include the plural number and vice versa.

In this Privacy Policy, the headings and captions used herein are inserted for convenience of reference only and shall not affect its interpretation.

This Privacy Policy sets out the policies and practices of which any information including Personal Data collected, processed, used and retained by us for the purposes of the operation of our business, provision of Services to our Customers and offering other Services or products of Plaza Premium Group that may be of interest to the Customer. You should read the following carefully to understand our views and practices regarding Personal Data and how we will treat and protect it in accordance with the provisions of the Data Protection Laws.

All non-English versions of this Privacy Policy are translations of the original version in English for information purpose only. In the event of any discrepancy, the English version will prevail.

## 2. Collection of Information

2.1 We will request you to provide the following Data for our collection and process of the same, including but not limited to:

- a. Information and/or Personal Data collected from the booking processes for the purpose of completing the booking including but not limited to those collected from online booking, when you make booking for our Services, and any other Personal Data voluntarily provided by you for making a booking such as your name, address, telephone number, method of payment, credit card details and special requests;
- b. Information and/or Personal Data collected when you make any online enquiries such as your name, email address, phone number, company name and special remarks;
- c. Information and/or Personal Data collected when you make booking for our Services, from the booking confirmation for the purpose of reviewing your feedback on our Services;
- d. Information and/or Personal Data collected when you use our Services for the purpose of verifying your identities including but not limited to passport numbers, identity card numbers, and driver's license that may be required by local laws;
- e. Information and/or Data collected when you use our Services for the purpose of complying with our financial reporting requirements, survey and research information collected from you by online or offline channels and providing more comfortable Services to you in the future including but not limited to your food and beverage preferences, special requests, and your spending during your stay; and/or
- f. Information and/or Personal Data collected from you when you set up an account with us including but not limited to name, email address, your registration status with other service brands owned or managed by Plaza Premium Group, loyalty programme registration number, correspondence address, food and beverage preferences and service requests.

2.2 Supply of information or Personal Data to us is non-obligatory except that certain Personal Data is required to be provided by local laws and/or required by us in order to provide our products and/or Services to you. You may also want to be cautious about providing any information or Personal Data through WiFi or any other wireless Internet connection and you should understand and accept that the risk associated with such connection methods are out of our responsibility and no security system or system of transmitting information over the Internet is guaranteed to be secure.

**2.3 Special categories of Personal Data (Sensitive Data).** Where required or permitted by Data Protection Laws or where you have specifically given us your explicit consent, we may ask for special categories of Personal Data including information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data or biometric data for the purpose of uniquely identifying a natural person, data concerning health or a person's sexual orientation.

### **3. Cookies**

3.1 Cookies are used on all online tools available to you including, without limitation, the Website to distinguish you from other online users, to analyse how viewers navigate Website with a view to optimise its design, to establish and maintain your logged-in identity if you log into your account with us so that you can move around Website without being asked to login again.

3.2 You should understand that while cookies in general do not tell us your email address or other Personal Data, however, if you voluntarily provide such information or Personal Data to us by, for example, registering an account with us or subscribing for any of our Services, such information may be linked to the data in the cookie.

3.3 In addition to the information we collect through cookies, we also collect behavioural Data and store such Data for analytical purposes so as to conduct marketing research and improve the quality of our Website. Such Data includes information about your visit such as your server address, the date and time of your visit, the page you accessed, the information you downloaded and the type of Internet browser you used.

3.4 The use of any information we collected either through the use of cookies or otherwise shall be subject to this Privacy Policy.

3.5 Most web browsers are initially set up to accept cookies. You may choose to edit your browser options to block cookies in the future. If you block cookies, certain features on the Website may not work properly.

3.6 Please take note that cookies from third parties unaffiliated with Plaza Premium Group or our business partners may be set before, during or after browsing our Website. We do not and cannot control these cookies set by third parties and you should check with these third-party websites for more information about their cookies.

### **4. Retention and transfer of Personal Data**

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4.1 Data provided by you will be retained for such period as may be necessary for carrying out the purposes stated in this Privacy Policy and in any event, for as long as required by the Data Protection Laws and/or applicable local law. Unless otherwise agreed, any documents containing Personal Data that you have provided to us become our property and we will destroy any documents in possession in accordance with the Data Protection Laws and/or applicable local law.

4.2 Data collected by us in order to carry out the purposes or directly related purposes stated in this Privacy Policy will be stored in our databases. The databases owned and managed by Plaza Premium Group or Suppliers may include Personal Data such as guest name, address, email, and/or phone numbers.

4.3 The databases managed by us may also include guest passport number, driving licence number or credit card payment information if such is required by local laws or you voluntarily choose to save such information in your account with us for facilitating your future bookings.

4.4 All Personal Data stored in our databases are encrypted and treated as confidential information.

4.5 We may also store other information such as your special requests, food and beverage preferences and transaction history in our databases and this information may be shared and/or used by Plaza Premium Group and/or affiliated businesses units for marketing and/or analysis to enhance Customers' experience.

4.6 As we operate our business including the Services in various countries, the nature of our business requires us to transfer Personal Data to other companies within Plaza Premium Group, operation units or service providers that may be located outside of your own country for the purposes mentioned in this Privacy Policy. You agree to this transfer, storing or processing by submitting your Personal Data to us. We shall take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy. Where such a transfer is performed, it will be done in compliance with the requirements of the Data Protection Laws. Plaza Premium Group will take reasonable and exercise due diligence to ensure that Personal Data, after being transferred to recipients located in other countries will not be stored, processed, or used in any manner which, if it were in Hong Kong, would be a contravention of the Data Protection Laws.

## **5. Purposes for Collection and Use of Personal Data**

5.1 The purposes for which your Data may be and/or is used by us include, without limitation to, in the following ways:

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- a. To process and administer your booking application, online enquiries and/or requests;
- b. To fulfil and process enquiries and/or requests submitted by you for any Services offered by us;
- c. To provide and maintain Website or any of our other Services to you;
- d. To improve the Website and your account with us, including, without limitation, to address your queries and notify you of any proposed or actual changes to Website;
- e. To compile and provide anonymous statistics about users of the Website, and provide related usage information to reputable third parties, which will not in any event enable any third party to identify individuals;
- f. To provide and/or market the goods and/or Services provided by us and/or our affiliated business partners;
- g. To manage the relationship between you and Plaza Premium Group;
- h. To facilitate our business operations across our group of companies including the fulfilment of any legal requirements; and
- i. To evaluate, develop, offer and promote goods and/or Services provided by us and/or our affiliated business partners.

5.2 We will not use your Personal Data to conduct direct marketing via email, push message, direct mail, telephone, fax and or other form of communication, to provide you with information about goods and/or Services which are a part of Services offered to you by Plaza Premium Group unless you have agreed to receiving marketing materials in such manner when providing your Personal Data to us.

5.3 If you agree to the above direct marketing use, your Personal Data held by us may be shared within Plaza Premium Group. The intended kinds of Personal Data to be used are all kinds of your Personal Data which necessarily enable us to establish contact with you; and to market or promote a variety of our Services, facilities and related goods and/or Services offered by us and/or affiliated businesses. However, we shall not use or provide your Personal Data unless exempted by the Data Protection Laws or we have received your consent.

5.4 Your consent to the use of your Personal Data for the direct marketing use as indicated above can be given in the following ways:

- a. You may indicate your consent to the above by the following ways: ticking the box(es) indicating your consent when providing us with your Personal Data through our Website, or forms; indicating your consent to our Customer representative when providing us with your Personal Data through telephone; or ticking the box(es) indicating your consent

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when using our Services;

b. You may opt-out from receiving marketing communications at any time, free of charge, by the following ways: following the “opt-out” or “unsubscribe” instructions contained in the marketing communications; or by emailing to us at **compliance.dpo@plaza-network.com** with the subject “Unsubscribe”, or via mail to **"Data Protection Officer – Plaza Premium Group, 8/F Commercial Building, Airport Freight Forwarding Centre, 2 Chun Wan Road, Lantau, Hong Kong"**.

## **6. Disclosure of Personal Data**

6.1 If you have registered a member account with us, you hold the sole responsibility of safeguarding your own login and password information for your account with us and such should not be disclosed to any third parties. We shall not ask you for your password under any circumstances. The risks of the leakage of your Personal Data resulting from your loss of the login and password information lie solely with you.

6.2 You acknowledge and understand that the transmission of information via the Internet is not completely secure. Although we have taken practical steps to safeguard your Personal Data, to prevent unauthorised access, and have implemented high standard security measures to protect any information received, we do not guarantee the security of your Personal Data transmitted via Internet, and you acknowledge and accept that any transmission is at your own risk.

6.3 You authorise us to use and share Personal Data provided by you within Plaza Premium Group and its affiliated businesses, airport authorities and/or the Suppliers who provide Services to assist in fulfilling the purposes, or directly related purposes for which the Personal Data was collected, or as required under the relevant laws.

6.4 You agree to update your own Personal Data from time to time so that it remains accurate.

6.5 You authorise our Suppliers to disclose your Personal Data registered with such Suppliers to us, whether such Personal Data has been previously provided to us or not.

6.6 You understand that it is an inherent part of our business to provide you quality services and facilities owned, managed and/or operated by us or our affiliated businesses. As a result, this requires the sharing of your Personal Data to our affiliated businesses, and that you may opt out of such sharing by



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not subscribing our services or not registering account with us. You may withdraw your consent or authorisation to us at any time pursuant to section 7.

## **7. Consent**

7.1 By using Services provided by us and/or using the Website or by providing any Personal Data to us via registering an account with us and/or placing an order on the Website and/or providing your Personal Data to us via the Website, you consent to the collection and/or use of your Personal Data and/or other Data as stated in this Privacy Policy and as set out elsewhere in any legal notices. You should not provide us any Personal Data if you do not consent to such collection and/or use. For any withdrawal of consent and/or use of your Personal Data by you, please write to us at the address listed below under section 10 – “Contact”.

## **8. Access Rights**

8.1 You may request to access and to correct your Personal Data held by us. If you wish to obtain a copy of any of such Personal Data, or if you believe that such Personal Data is incorrect, or if you believe that such Personal Data was used beyond the scope of the purposes or directly related purposes as stated in this Privacy Policy or was acquired by fraudulent or unlawful means, please write to us at the address listed below under section 10 – “Contact”.

8.2 A request for access or correction to, or deletion of Personal Data, or to obtain a copy of the Privacy Policy must be in writing and sent to us at the address listed below under section 10 – “Contact”.

8.3 All Personal Data is handled in accordance with the Data Protection Laws. Should any provision of this Privacy Policy stipulated herein be found by any court or administrative body of competent jurisdiction to be invalid or unenforceable, the invalidity or unenforceability of such provision shall not affect the other provisions of this Privacy Policy. All provisions not affected by such invalidity or unenforceability shall remain in full force and effect.

## **9. Changes to Privacy Policy**

9.1 You accept and agree that we shall have the sole discretion to amend this Privacy Policy upon reasonable notice where it is possible and/or practical to give such notice. Any revised version of this Privacy Policy shall be effective as at the date of publication on Website.

## **10. Contact**

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10.1 You may contact us by emailing [compliance.dpo@plaza-network.com](mailto:compliance.dpo@plaza-network.com) or mail to: “Data Protection Officer – Plaza Premium Group, 8/F Commercial Building, Airport Freight Forwarding Centre, 2 Chun Wan Road, Lantau, Hong Kong” if you have any concerns or requests about this Privacy Policy or how we have been using your Personal Data.

**Important Notice**

This Privacy Policy only applies to this Website and not to the websites of other companies, individuals, or organisations to which we provide links or from which there are links.