



## THE SINGULAR HOTELS PRIVACY POLICY

### 1. INTRODUCTION

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This document establishes the rules and procedures by which The Singular Hotels (“**The Singular**” or the “**Company**”) collects, uses, protects and discloses (when appropriate) the personal information of its guests (“**Privacy Policy**” or the “**Policy**”). The main objective of this instrument is the protection of our guests’ privacy, as well as the safe and confidential use of their personal data, from before their arrival at our hotels, until after their departure.

The Policy is directed to our guests, suppliers, agents or intermediaries, collaborators, providers of external services, and their dependents. The obligations and procedures contained in this instrument, govern both hotels, The Singular Santiago and The Singular Patagonia.

This Policy has been prepared in compliance with the current legislation, and extends to all personal information collected by the Company, either through itself, or through third parties.

### 2. PERSONAL INFORMATION

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For purposes of this Policy, “Personal Information” is all information about an identified or identifiable person. The personal information that The Singular collects or may receive from its guests, and which it undertakes to safeguard, includes:

- **Basic information:** Name, gender, nationality, date and place of birth, racial origin, religion, important personal dates such as anniversaries and others, national identity card and passport number, visa information or other migratory background;
- **Contact information:** E-mail, cell phone, landline and office, address of personal and office address, zip code of residence and others;
- **Financial and labor information:** Debit, credit and other cards, list of expenses, consumption, transaction history, data of the employer or company related to the guest;
- **Personal information:** Image and image patterns that may identify guests, CCTV recordings, photographs, biometric information, voice identity, facial recognition, health status, preferred language, clubs, associations and other organizations of which the guest is a member or partner, information from social networks and others;

- **Accommodation information:** Hotels and other places where the guest has stayed, dates of arrival and departure, goods and services used, routes chosen for visits or tours, special requests made, observations about their service preferences (which includes preferences of room, holiday, food and others), telephone numbers dialed and fax and telephone messages received, safe service request, information about partner programs, discounts and others;

- **Preference information:** Comments, contents and others provided by the guest regarding their marketing preferences, in surveys, sweepstakes, contests, promotional offers or others, made by The Singular or by third parties, to which The Singular has had in any way access, among others;

- **Collected information:** Whether in the Company’s premises or in dependent or nearby premises, using closed circuit television systems, Internet systems (including wired or wireless networks that collect data about a computer, smart or mobile device or its location), key card and other security and technology systems, including patterns of behavior and conduct, routines, preferences, among others;



▪ **Third party information:** Contact details and other relevant information related to employees of corporate accounts, suppliers and other individuals with whom The Singular maintains business relationships (travel agents, intermediaries, meeting and event organizers, security services, special services, among others), information delivered by agents, suppliers and service providers, among others.

This Policy applies to all personal information obtained by the Company, either directly or through third parties, which cannot be classified as public information. In case of information obtained by third parties, section 4. A) of this Policy will apply.

In the event that, according to Chilean law, such information is considered as personal data, or another term or similar concept subject to regulation and protection by law, The Singular remains

fully subject to such regulation, and will only process such information in as allowed by current law. In case of process, investigation or litigation, whether judicial or administrative, such information will be protected with the corresponding diligence and will only be provided to the Authority in compliance with the applicable law in force and in accordance with the provisions of section 4. E) of this Policy.

When the guest, supplier or worker of The Singular accepts this Policy, it will be, up to the required degree according to the Chilean legislation, granting its express and written consent for the processing of any personal information provided to The Singular that is considered as personal data, financial information or other applicable. Except as required by law or the respective contracts, the guest, supplier or worker is not obligated to provide The Singular with any personal information.

### 3. USE OF PERSONAL INFORMATION BY THE COMPANY

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In accordance with current laws, the Company may collect, use, store and transmit portions of the Personal Information received for the following purposes:

- To book and bill the lodging in the hotels, and for the provision of other goods and services;
- To provide the guest with a special or personalized level of service by including information and/or third-party services (additional hotel services, among others);
- To organize services on behalf of the guests, including special tourism programs, expeditions, tours, restaurants, transportation services, among others;
- To manage special programs of the Company for guests who require them;
- To comply with contractual obligations with the client, with those involved in the process of organizing the trip of the client (for example, travel agents, intermediaries, group travel organizers or their employer) and with suppliers;

- To conduct market surveys, guest satisfaction and quality control surveys, and direct marketing and sales promotions inside and outside the Company's facilities;
- To cover the needs of security and protection of personnel, guests or other visitors;
- To manage the general management of documents;
- To comply with legal and regulatory requirements;
- To test and evaluate new products and services; and
- To process credit requests.



#### 4. DISCLOSURE OF THE CLIENT'S PERSONAL INFORMATION

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Only in the qualified cases indicated in this section may The Singular disclose the personal information of the guest, maintaining respect and strict adherence to current legislation and the privacy of its customers.

When the law requires it, the Company must request the authorization of the guest and/or the provider, agent or service provider that holds the information, for the purpose of transmitting it to third parties.

The Singular, when requested by the Authority, may transmit certain stored personal information, seeking to mitigate, to the maximum, the impact of such disclosure, and proceeding with the greatest possible discretion.

By accepting this Policy, guests, workers of The Singular and its suppliers, agents, intermediaries and service providers accept the transfer of personal information they possess, when the law so requires or authorizes.

The cases in which personal information may be transmitted are restricted to the following:

**A) Agents, operators, intermediaries, service providers and suppliers:** For the provision of certain services, processing of functions or data, the Company may disclose personal information of guests to third parties related to such services. In turn, the third party will be obliged to respect this Policy in all its procedures related to the services provided to guests or the Company.

**B) Personal information of the guest in possession of the Company:** In the constant search of the Company to improve and grant an excellence service to its guests, it may share personal information with service providers, external advisory or consultancy, in order to develop studies of customer experience, quality controls, satisfaction surveys, among other equivalents, always looking after of the privacy of such information.

**C) Authorization of credit:** When the guest or its associated companies request a credit, the personal information will be used and disclosed to appropriate third parties, in accordance with the laws in force, in order to determine the credit capacity of the applicant.

**D) Legal requirements:** The Company reserves the right to disclose any personal information it has about its guests if a competent national or foreign court or authority, whose request has been duly processed, compels it to do so, or, if the Company deems it necessary or convenient to comply with the law or to protect or defend his/her rights or property, in accordance with the laws in force. Likewise, the Company reserves the right to keep the personal information collected and to process such information in order to comply with accounting and tax regulations and with any specific law in the matter.

#### 5. INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

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In case personal information of the guests must be transferred internationally, either to a private or public entity, individuals or legal entities, or others, such transfer must be subject to the current legislation of the destination State of the information.

If the data protection standards of the destination State are lower than those of Chile and this Policy, The Singular will make sure that the appropriate protections are applied and will oblige the

third party receiving the information to protect the personal information of the guest in accordance with the terms and conditions of this Policy, with the appropriate security measures.





## 6. INFORMATION COLLECTED BY VISITS ON THE INTERNET

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If the visitor accesses websites or other applications of The Singular, he declares the following:

**A) Navigation:** The visitor can always access the websites and other applications of the Company without revealing its identity.

**B) Information of use:** By visiting the referred websites, the acceptor user authorizes The Singular to collect information on how the visitor uses the sites, such as the IP address, the date and time of the visit, the pages accessed and the amount of time spent on each page, the type of Internet browser used, the operating system of his/hers device, among other related subjects. That information is not related to the visitor as an individual, but records of the type of device being used may be retained.

**C) Cookies:** The Singular uses the technology of cookies on its websites to evaluate and improve the functionality of the sites. Cookies by themselves will not be used to reveal his/her identity. They identify the visitor's browser or device to their servers when they visit the websites, but not the visitor itself. If the visitor does not want to accept cookies, he/she can block them by adjusting the settings of the Internet browser. However, if the visitor blocks them, he/she may not be able to use all the features of The Singular's websites. The same will apply for cookies from third party service providers on The Singular's websites.

**D) Subscription to the newsletter of the Company:** The Company will keep the information provided by the subscriber in private, and will only be used for the sending of the respective newsletter, development of statistics, and other functions of the application.

**E) Social networks:** If the visitor enters the social networks of The Singular, is subject to the information protection policies that these social networks have established. If the visitor communicates with a contact of The Singular through these networks, their identity will also be kept private.

**F) Underage:** If the visitor is under 18 years of age (or is underage in the jurisdiction in which they access The Singular's websites), they can only use the tools available on the Company's website, if they would have with the authorizations required by the respective jurisdiction so that minors can contract goods and services.

**G) Personalized ads:** When permitted by law, the Company may work with other companies to share advertisements or promotions that it deems to be relevant and useful for the visitor. This may include ads that appear on websites or applications, communications sent by the Company, or advertisements that appear on the websites of other companies. The advertisements that the visitor sees can be based on information collected by the Company or by third parties or based on their activities on such websites or third party sites.

## 7. APPLICATIONS AND USER CREATION

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At the date of enactment of this policy, the Company does not have web systems that allow guests to create accounts or personalized users for the purposes of handling reservations, contracting special services, loyalty programs or other equivalent purpose. However, in the event that the Company in the future

incorporates such systems, this Policy must be modified in order to adequately protect the Personal Information that users store in those accounts or users.



## 8. OPTION TO DELIVER INFORMATION TO THE COMPANY

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The guest or his intermediaries may always, for qualified reasons that will be evaluated case by case by the Company, partially deny the information required by it, when it is considered that the disclosure of such information could be harmful to the guest.

## 9. ACCESS TO PERSONAL INFORMATION AND UPDATE OF SUCH INFORMATION

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With some limited exceptions, the guest has the right to access the personal information that the Company keeps about his person and to update it. If the guest wishes to consult about any personal information that the Company may have about the guest, he/she may do so by sending a written request, by letter or email, to the addresses indicated in Section N ° 13 of this Policy.

The guest must include his/her full name, address and telephone number and a copy of a document that certifies his/her identity (such as an identification card or passport), for its record, and verify whether the Company actually has personal information about the guest, or if it may need to contact the guest to obtain any additional information required to make that determination.

The guest may request the amendment, deletion, abandonment of use, the process or restriction of process of his/her personal information that the Company retains about them by letter or email to the address indicated in Section N ° 13 of this Policy. If the company considers that the personal information is incorrect or that the processing should be interrupted as requested by the guest, the respective personal information will be eliminated or corrected.

If the guest is not satisfied with how their request was handled, they can raise their concern to the Management of the Company, sending an email to [infosantiago@thesingular.com](mailto:infosantiago@thesingular.com).

## 10. OBLIGATIONS OF SUPPLIERS, TOUR OPERATORS, INTERMEDIARIES, AGENTS AND SERVICE PROVIDERS

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When contracting with the Company, suppliers, tour operators, intermediaries, agents and external service providers, or any other third party that provides services to the Company and/or its guests, directly or indirectly, expressly accept the entire contents of this Policy, and accept, in addition, the following obligations:

- All personal information of guests that is of knowledge of suppliers, tour operators, intermediaries, agents and external service providers, or any other third party that provides services to the Company and/or its guests, directly or indirectly, shall be maintained absolutely reserved, without being able to share it with any third party, except those expressly authorized by The Singular to have access to such information.
- All guest information of The Singular that the third parties referred to in this section receive from the Company, must be

deleted and/or destroyed by them within 12 months following the provision of services for which they have been contracted, unless expressly authorized by the guest or the Company.

- When the personnel of the entities referred to above enter the computer systems, servers, physical facilities or premises of the Company, they will be subject to the same confidentiality and reservation obligations as those established for the Company's employees, as applicable.
- The contracts that the Company subscribes with the aforementioned third parties from this date onwards, will include express mention to this Policy, which will be considered as an integral part of such instruments.



## 11. OBLIGATIONS OF THE WORKERS OF THE SINGULAR

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All workers of the Company, whether they work under labor contract, or provision of services or other contract modality, whether temporarily, part-time, full-time and indefinite, or any other modality, must strictly comply with this Policy and especially, to the following obligations:

- All personal information of guests that comes to their knowledge must be kept absolutely reserved, and may only be shared with other personnel authorized by the Company.
- All personal information to which the staff has accidentally accessed will be considered personal information, and will have a strict treatment, not being able, in that case, to be shared with any other hotel worker, nor will it be registered.
- The staff will not be authorized to obtain or request from the hotel guests photographs, autographs, video recordings or other actions that are usual with people of public connotation.
- To maintain the privacy of customers, any request for information made via email or telephone will be answered maintaining maximum confidentiality, avoiding including more people than those that are strictly necessary in the email chains or telephone calls.
- In case of doubt about whether or not it is personal information, the worker should immediately consult his superior .
- Regarding personal information to which the personnel have had access, which may constitute or report a crime or offence, or which could seriously compromise the reputation, prestige or safety of the Company, the facilities or its personnel, guests or third parties, should immediately communicate it to the Management of the Company.
- All new personnel, including interns, clerks, part-times and others, should be given an induction of the Company's privacy policy when commencing their duties, and it will be the duty of the new worker to read this Policy in its entirety.
- Employees of the Company, whom because of their particular functions within the Company, have access to financial information of guests, such as credit cards, debit cards, checks, bank accounts, and/or participate in procedures such as payment processing, billing, booking management, among others, will incorporate in their respective work contracts, additional obligations of confidentiality and probity, and in the case of breach of such obligations, the most severe sanctions available in accordance with the law.

## 12. CHANGES IN THIS POLICY

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This instrument may be modified unilaterally by the Company, which will inform the general public on its website, and individually to its employees, suppliers, tour operators, intermediaries, agents and external service providers, or any other third party that provide services to the Company and/or its guests, whether directly or indirectly.





### 13. REQUEST FOR ACCESS TO PERSONAL INFORMATION, QUESTIONS OR COMPLAINTS

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If the guest or a third party has questions about this Policy, about the processing of their data or any concerns or complaints regarding the administration of the Policy, or if they wish to submit an application (as described above in Section N ° 9) to exercise their rights in relation to the personal information that The Singular keeps, he/she can communicate with it through the following means:

Phone: **+56 22 3068817**

Email: [infopatagonia@thesingular.com](mailto:infopatagonia@thesingular.com).

If the interested party does not receive a satisfactory answer, he/she can raise the concern to the hotel management by sending an email to [infosantiago@thesingular.com](mailto:infosantiago@thesingular.com).

All requests for access to personal information must be submitted in writing, by letter or email. This request will be answered by letter, email, telephone or other suitable method.

### 14. APPLICABLE LAW, VALIDITY AND LANGUAGE

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The Policy is governed by the law of the Republic of Chile, and in case of inconsistency between the Spanish version and the English version, the Spanish version will prevail.

