

HOTELES GRACE



INTRODUCTION

In compliance with Law 1581 of 2012 and Decree 1377 of 2013, HOTELES Grace has implemented a policy in which Habeas Data is implemented. This in order to be clear the procedures that are carried out for a management of information and other data collected, thus complying with article 15 and 20 enshrined in the political constitution.

Hoteles Grace welcomes Law 1581 of 2012 and Decree 1377 of 2013 and other rules that are generated, and makes this policy available to all our visitors, collaborators, suppliers, guests and other people linked to our hotels.



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GENERAL DATA GRACE HOTELS

Hotel Grace Chapinero

Nit: 79.602.776-8

Address: Carrera 9a N.61-13 Email:

gracechapinerohotel@gmail.com

Web page: www.hotelesgrace.com

Hotel Living 55

Nit: 79.602.776-8

Address: Calle 55 N.10-73

Email: reservasliving55@hotmail.com

Web page: www.hotelesgrace.com

Hotel Regina

Nit: 900.560.489-4

Address: Carrera 5 N.15-14

Email: admonregina@gmail.com

Web page: www.hotelesgrace.com

Hotel the Grace

Nit: 79.602.776-8

Address: Calle 66 N.6-18

Email: thegracehotel@hotmail.com

Web page: www.hotelesgrace.com



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"ARTICLE FIRST: OBJECTIVE

This document is intended to provide all our collaborators, guests, visitors and other internal and external personnel who have a relationship with the Hoteles Grace , the security and correct handling that will be given to their data in compliance with Law 1581 of 2012. In addition Establish a protocol so that people can file their complaints, complaints or others when it is considered that this law is not being fulfilled in its entirety.

ARTICLE SECOND: DEFINITIONS

- **DATABASE:** organized set of personal data that is subject to treatment. The "database" will have such a status regardless of the medium in which those are contained, it can be physical, electronic, manual, automated, computer tools, etc.
- **AUTHORIZATION:** prior, express and informed consent of the owner to carry out the processing of personal data.
- **MANUAL:** Document that explains the step by step of the realization and the structure of a process.
- **LAW:** It is a norm imposed by the legal branch which must be fulfilled in its totality, otherwise penalties will be generated.
- **DECREE:** Resolution that takes a judicial and juridical body that must be fulfilled in its totality.
- **INFORMATION MANAGEMENT:** Consent in which people authorize the handling of information within a company.**PRIVACY NOTICE:** verbal or written communication generated by the person responsible, addressed to the owner for the treatment of their personal data, by which is informed about the existence of the information treatment policies that will be applicable, the way of accessing them and the purposes of the treatment intended to be given to personal data.
- **DATA:** It is the information that is required to be stored in a database.
- **SENSITIVE DATA:** Sensitive data are those that affect the privacy of the



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owner or whose abuse may generate discrimination, such as those that racial or ethnic origin, political orientation, religious or philosophical beliefs, membership of trade unions, social organizations or human rights that promotes the interests of any political party or that guarantee the rights and opposition political parties, as well as data relating to health, sex life, and biometric data.

- **TRANSFER:** the data transfer takes place when the person responsible or in charge of the processing of personal data, located in Colombia, sends the information or personal data to a receiver, who in turn is responsible for the treatment and is inside or outside from the country.
- **EXTERNAL CONTRIBUTORS:** They are the people who do not work for the company, but who provide some kind of service, such as suppliers.
- **INTERNAL CONTRIBUTORS:** These are the people who work within the company.

ARTICLE THIRD: VALUES

- **VALUE OF PURPOSE:** the treatment must obey a legitimate purpose in accordance with the Constitution and Law, which must be informed to the holder.
- **VALUE OF FREEDOM:** treatment can only be exercised with the prior, express, and informed consent of the holder. Personal data may not be obtained or disclosed without prior authorization, or in the absence of a legal or judicial mandate that relieves the feelingly.
- **VALUE OF VERACITY OR QUALITY:** The information subject to treatment must be truthful, complete, accurate, updated, verifiable and understandable. The treatment of partial, incomplete or fractionated data is forbidden.
- **VALUE OF TRANSPARENCY:** the treatment must guarantee the right of the holder to obtain from the controller, at any time and without restrictions, information about the existence of data that may concern.
- **VALUE OF ACCESS AND RESTRICTED CIRCULATION:** the treatment is subject to the limits that derive from the nature of the personal data, the



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provisions of the law and the Constitution. In this sense, the treatment can only be done by persons authorized by the holder and / or by persons provided for by law. Personal data, except for public information, may not be available on the Internet or other means of mass communication or communication, unless access is technically controllable to provide restricted knowledge only to authorized owners or third parties.

- SAFETY VALUE: The information subject to treatment by HOTELS DANN shall be handled with the technical, human and administrative measures necessary to provide security for the records, avoiding their adulteration, loss, consultation, use or unauthorized or fraudulent access.
- PRINCIPLE OF CONFIDENTIALITY: HOTELS DANN is obliged to guarantee the reservation of the information, even after its relationship with any of the tasks included in the treatment, and may only supply or communicate personal data when it corresponds to the development of authorized activities In the law.

ARTICLE FOURTH: SPACE OF APPLICATION

Hoteles Grace applies the data protection policy to all our collaborators, guests, visitors and other internal and external personnel related to Hoteles Grace, who, under authorization, allow us to collect basic personal information from the holder described as follows: name, type and number Identity document, address, e-mail address, contact telephone number, among others. In addition, it manages data such as those entered by job seekers as resumes.

ARTICLE FIFTH: USE OF SENSITIVE DATA

- The use, manipulation and / or storage of sensitive data is prohibited unless it is authorized or the use is necessary for special cases in which the interests of the holder are affected, when the use of information is for activities or programs of The ONG, associations, foundations, or other non-profit entities, just as these must be authorized by the holder. In case of a disability, legal representatives must generate authorization



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- Cases in which problems arise or are part of a judicial process

ARTICLE SIXTH: RIGHTS OF CHILDREN AND ADOLESCENTS

In relation to the information that is handled of children and adolescents, in this case information of the children of the collaborators, The data are strictly confidential unless they are of public nature, as affiliations of health, programs subsidized by regulators of the Government, security.

Committed to the preservation of personal data, employees are informed about the risks and precautions that must be taken when making this data publicly available, so that they can inform their children about security measures when publishing their data.

ARTICLE SEVENTH: RIGHTS OF THE HOLDER

- To know, to update and to rectify their personal data in front of the Responsible of the Treatment or in charge of the Treatment. This right may be exercised, inter alia, against partial data, inaccurate, incomplete, fractioned, misleading, or those whose Treatment is expressly prohibited or has not been authorized;
- Request proof of the authorization granted to the Responsible for Treatment except when expressly excepted as a requirement for Treatment, in accordance with the provisions of article 10 of this law;
- Be informed by the Treatment Manager or the Treatment Manager, upon request, regarding the use that he has given to his personal data;
- Submit to the Superintendency of Industry and Commerce complaints for violations of the provisions of this law and other rules that modify, add or complement;
- Revoke the authorization and / or request the deletion of the data when in the Treatment the principles, rights and constitutional and legal guarantees are not respected. The revocation and / or suppression shall proceed when



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the Superintendency of Industry and Commerce has determined that in the Treatment the Person in Charge has engaged in conduct contrary to this law and the Constitutio

- Free access to your personal data that have been processed.

ARTICLE EIGHTH: AUTHORIZATION:

HOTELES GRACE, In its process of linking of personnel, to initiate commercial relations with suppliers and for the stay of our guests. The data management authorization signed by the holder was requested. Which will be stored by the company.

ARTICLE NINTH: DATA FOR WHICH THE AUTHORIZATION IS NOT NECESSARY

- Information required by a public or administrative entity in the exercise of its legal functions or by court order.
- Data of a public nature.
- Medical or health emergency cases
- Treatment of information authorized by law for historical, statistical or scientific purposes.
- Data related to the Civil Registry of Persons.
- Whoever accesses personal data without prior authorization must in any case comply with the provisions contained in this law.
- Reports ARL, EPS. Of accidents or labor incidents.

ARTICLE TENTH: PERSONS TO WHOM THE INFORMATION MAY BE PROVIDED.

- The information that meets the conditions established in this law may be supplied to the following persons:
- To the Holders, their successors in title or their legal representatives.
- To public or administrative entities in the exercise of their legal functions or by judicial order.
- To the third parties authorized by the Holder or by law.



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ARTICLE ELEVENTH: CONSULTATIONS

The Holders may consult their personal information contained in any database, whether public or private. The Treatment Manager must provide all the information contained in the individual registration or that is linked to the Identification of the Holder.

The mail query must be done by any of the following channels

- Written:
STREET 55 NO. 10 - 73 IN BOGOTÁ
E-MAIL: rhotelesliving@gmail.com
- Presential:
STREET 55 NO. 10 - 73 IN BOGOTÁ
Telephone:
3462949

This will be attended to within a maximum period of ten (10) working days from the date of receipt of the same.

ARTICLE TWELFTH: CLAIMS

- When the holder considers that there are erroneous data or his information is being manipulated incorrectly he will be able to make a claim under the following process.
- Identification of the holder of the data.
- Accurate description of the facts that give rise to the claim.
- Data of notification, physical and / or electronic address.
- Other documents that the holder considers important for the review
- The claim will be reviewed and once verified the data will be removed, then a new authorization will be made for the data management that the holder allows authorization.



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ARTICLE THIRTEENTH. REQUIREMENT OF PROCEDIBILITY.

The Holder may only file a complaint with the Superintendency of Industry and Commerce once the process of consultation or complaint has been exhausted before the person responsible for the treatment or in charge of the treatment.

ARTICLE FOURTEENTH. DUTIES HOTELES GRACE FOR THE PROTECTION OF DATA

- Ensure the Card Holder, at all times, the full and effective exercise of the right of habeas data;
- Request and keep, in the conditions foreseen in the present law, a copy of the respective authorization granted by the Holder;
- Duly inform the Holder about the purpose of the collection and the rights that assist him by virtue of the authorization granted;
- Keep the information under the necessary security conditions to prevent its adulteration, loss, consultation, use or unauthorized or fraudulent access;
- Ensure that the information provided to the Treatment Manager is truthful, complete, accurate, up-to-date, verifiable and comprehensible;
- Update the information, communicating in a timely manner to the Treatment Manager, all the new information regarding the data previously provided to him and take the other necessary measures so that the information provided to him is kept up to date;
- To rectify the information when it is incorrect and to communicate the pertinent thing to the Person in charge of the Treatment;
- To provide the Treatment Manager, as the case may be, with only data whose Treatment is previously authorized in accordance with the provisions of this law;
- Require the Treatment Manager at all times, the respect to the conditions of security and privacy of the information of the Holder;
- Process the consultations and claims formulated in the terms indicated in this law.
- Adopt an internal policy and procedures manual to ensure proper



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compliance with this law and, in particular, for the attention of inquiries and complaints;

- To inform the Data Protection Officer when certain information is under discussion by the Holder, once the complaint has been filed and the respective process has not been completed;
- Inform at the request of the Owner about the use given to their data.
- Inform the data protection authority when there are violations of the security codes and there are risks in the administration of the information of the Holders.
- Comply with the instructions and requirements issued by the Superintendency of Industry and Commerce.

ARTICLE FIFTEENTH. AREAS WHICH HAVE ACCESS TO THE INFORMATION

Hoteles Grace in compliance with Law 1581 of 2012, informs all its collaborators that the information provided by them will be confidential and will have transferred in areas of human management and accounting department. Regarding the handling of suppliers, this information will be handled only by the purchasing area, in all areas with authorization of the holder and exclusively for hiring processes, payments, affiliations Eps, Afp and Arp, training, purchase of EPP. In the case of suppliers use of services and purchase of inputs.

Note: If this information must be shared with third parties, it must be requested and authorized by the owner (signature authorization document).

ARTICLE SIXTEENTH. PRIVACY NOTICE

Living will inform all its employees about the existence of information manipulation policies, the notice can be given in a physical or electronic medium, specifying the type of information, the manipulation process, and the security measures that exist for the Data Protection.

ARTICLE SEVENTEENTH. CONTENT OF PRIVACY NOTICE



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- Name, company name and data of the controller
- The treatment to which the data and the purpose of the data will be submitted.
- The rights that assist the holder.
- The mechanisms arranged by the entity so that the holder knows the policy for the Processing of Personal Data and the substantial changes that occur in it or in the Notice of Privacy.
- Information on consultation and access to the Policy for the Processing of Personal Data.

ARTICLE EIGHTEENTH HANDLING OF INFORMATION

- The information provided by the owners will have the following management
- For administrative purposes of hotels
- Perform sociodemographic description of interest to the company and of requirement for the SG-SST
- Provide answers to questions, doubts, suggestions, requests, among others
- Consult information through databases
- Sending information of interest to employee
- Enrollment in training programs carried out by the company

The information provided here is for exclusive use by the administrative department in compliance with law 1582 of 2012, any other type of use that is given and violates the data protection rights must be informed in the privacy notice and may request the Consultation of the authorization signed by the holder. Always giving the correct handling and complying with all the legal norms that they demand it.

ARTICLE NINETEENTH: UPDATE AND RECTIFICATION OF DATA

HOTELS LIVING, will be rectifying and updating the information on a constant basis for further consultations. This information will be contained in the databases



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managed by the administrative area.

ARTICLE TWENTIETH: EFFECTIVENESS AND NOTICE OF POSSIBLE SUBSTANTIAL CHANGE IN TREATMENT POLICIES

The present Policy of the Treatment of Personal Data governs from the date of issue, will be divulged among all its collaborators by means of a training, this will be updated according to the laws, decrees, norms that are stipulated legally. And this will be supported by a new data authorization. "

Bibliografía

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