We, Hotel Shilla Co., Ltd. (also hereinafter referred to as the "Company"), use our best efforts to protect your privacy and personal information, and to that end the Company is committed to complying with the Promotion of the Use of Information and Communication Networks and Protection of Information Act (the "Information and Communication Networks Act"), the Privacy Protection Act and all other relevant laws and regulations. This Privacy Policy is posted for public access on the Company's website(http://www.shillahotels.com)so you can be well informed of what we do to protect your personal information.

This Privacy Policy may be revised or updated from time to time according to changes to pertinent laws, government policies or the Company's internal regulations and we will immediately notify you of such revisions or updates in order that you can be readily aware thereof.

The Company's Privacy Policy contains the following:

Date implemented: 1998-04-25 Last updated date: 2018-01-12

- 1. Collection of Personal Information; Purposes of Collection; Items to Be Collected; and Methods of Collection
- 2. Disclosure and Sharing of Collected Personal Information
- 3. Outsourcing the Handling of Personal Information
- 4. Collection of Personal Information by the Use of Cookies
- 5. Retention and Destruction of Personal Information
- 6. Rights and Obligations of Users and Exercise of Rights
- 7. Measures for Security of Personal Information
- 8. Gathering of Opinions and Handling of Complaints
- 9. Privacy Officer
- 10. Privacy Protection for Children under the Age of 14
- 11. Transmission of Advertising Messages
- 12. Linked Sites
- 13. Postss
- 14. Changes to the Privacy Policy

1. Collection of Personal Information; Purposes of Collection; Items to Be Collected; and Methods of Collection

A. When you attempt to sign up for a Hotel Shilla membership, we collect your personal information as may be required to identify you and provide e-commerce services. The personal information to be collected by the Company is as follows:

Collection of Personal Information; Purposes of Collection; Items to Be Collected; and Methods of Collection

Item	Purpose	Period
Full name, username, password, date of birth, e- mail address, contact number, mailing address and billing information	To confirm your identity, provide membership services, take reservations and deliver the hotel's gifts.	Until withdrawal from membership or delivery; or for five (5) years after room stay

B. When you sign up for a Hotel Shilla membership, we selectively collect the following personal information from you:

Collection of Personal Information; Purposes of Collection; Items to Be Collected; and Methods of
Collection

Item	Purpose	Period
Full name, e-mail address,	To provide benefits for anniversaries,	Until withdrawal from
contact number and	promote products and services; and	membership or for five (5)
anniversaries	investigate customer satisfaction.	years after room stay

C. When you are using online membership services, we may collect such information as your IP address, service-use history and billing information (i.e., credit card number, bank account number, gift card number, mobile-service payment authorization code, etc.), only for the purposes of making such services available and/or verifying your financial transactions.

D. We collect your personal information from your application for membership on our website and by means of written notices, facsimile or phone communications, online message boards, promotional events and/or other approaches for collection of created information.

2. Disclosure and Sharing of Collected Personal Information

A. We will not use or disclose to any third party any of your personal information, without your consent or except as required by law, for purposes other than those intended hereunder and specified herein.

B. If any business relations are formed through the services we provide, relevant information will be disclosed to the parties in question to the extent necessary for the conduct of transactions, subject to members' consent.

Disclosed to (Name of Recipient)	Purpose of Use by Recipient	Items of Information for Disclosure	Period of Retention/Use
Shilla Stay Co., Ltd.	To provide integrated reservation services and related convenience.	Name, date of birth, email address, phone number, length of stay (arrival and departure dates), payment method, passport number, and preferences	5 years after last stay
Korean Air Lines Co., Ltd.	To handle and/or identify flight	Name, contact number, email address, credit card information	Untile the purpose of use
Asiana Airlines Inc.	reservations.	(card number, expiration date, firsttwo digits of the password)% Card information is collected anddisclosed upon ticketing request.	is achieved
Jeju Rent Car	To handle and/or identify car rental reservations.	Name and contact number	5 years after contract date

C. In the event that the rights and obligations of a service provider is fully assigned or transferred as a result of sale, merger or acquisition, we will ensure that we inform you in advance of details of the reasons and procedures for such assignment or transfer and that you have the right to withdraw your consent to the use of your personal information.

D. Where your personal information is to be disclosed or shared, we will seek your consent in advance by notifying you by email or otherwise in writing of what items of such information will be disclosed or shared, whom the information will be disclosed to or shared with, why it should be disclosed or shared, and how and how long it will be protected and managed. The same procedures will apply in case the information recipient is changed.

E. Your personal information may be disclosed without your consent in accordance with applicable provisions of relevant laws:

- when needed to perform a contract relating to the provision of services;

- when duly and reasonably requested by an investigation authority for investigation purposes; or

- when made available in unidentifiable form for the compilation of statistics or for academic or market research purposes.

3. Outsourcing the Handling of Personal Information

The Company, for the provision of its services, has outsourced the handling of personal information on a contract basis as follows:

outsourcing the running of refsolut mornation		
Contractor (Outsourced to)	Outsourced Service	
Samsung SDS	Operation and maintenance of the computer system	
S-Tec	Operation of CCTV systems	
Hana DM	Product promotion and publicity; and direct mailing	
Living Room	Delivery of flower products	
LK GLS	Services related to the delivery of orders	
Yesong	Counseling to Shilla S members	
Shilla Stay Hotels (Dongtan, Jeju, Mapo and Gwanghwamun)	Integrated reservation services and other activities for registration/unregistration of Shilla Rewards members, awarding and redemption of Shilla Rewards points and customer response	

Outsourcing the Handling of Personal Information

4. Collection of personal information using cookies

A. Use of Cookies

We use cookies for the convenience of users. The information we collect through cookies includes your username and IP address and is used to keep you logged in and display personalized advertising messages.

B. Installation and Use of Cookies; and Refusal of Use

You have the option to accept or decline the installation of cookies and may set your web browser to accept all cookies, alert you whenever a cookie is stored, or disable or block the storage of cookies. Disabling or blocking the storage of cookies may limit your access to services requiring you to log in.

5. Retention and Destruction of Personal Information

A. The Company will retain your personal information until the purposes of collection or disclosure of such information are accomplished and will destroy your personal information immediately when such purposes are accomplished or upon the expiration of a retention period permitted by your consent. The times when we are required to destroy your personal information are as follows:

- Your membership information is destroyed when you withdraw or are dismissed from Hotel Shilla membership.

- Your delivery information is destroyed when a product or service has been delivered or provided.

- Your information collected for a survey or promotional event is destroyed upon when such survey or event is over.

- The information used to identify you is destroyed when your identity has been verified.

Notwithstanding the foregoing, when any of your personal information needs to be retained under relevant laws or internal regulations, we may retain such information (i) for a period of five (5) years if it pertains to the revocation of contracts or subscriptions; (ii) for a period of five (5) years if it relates to the supply of goods or services and payments therefor; or for a period of three (3) years if it pertains to the handling or resolution of complaints or disputes.

B. Your personal information will be destroyed by the following procedures and methods:Paper-printed information is destroyed with a paper shredder or through a shredding service provider.

- Electronically stored information is permanently deleted in a technically irretrievable manner.

6. Rights and Obligations of Users and Exercise of Rights

A. You have the right at any time to view, correct or delete your registered personal information, have it corrected or deleted, have its processing suspended or withdraw your consent to the use and disclosure thereof, directly on the Membership Information page of our website or by contacting our Privacy Officer in writing, by telephone (at 02-2233-3131) or by email, in which case we will respond forthwith after identity verification.

B. If you request that we correct an error in your registered personal information, such information will not be employed or disclosed until such correction is made accordingly. Where

any incorrect part of your personal information has been disclosed to any third party, we will have it corrected by giving immediate notice to such third party.

7. Measures for Security of Personal Information

A. In handling your personal information, we use our best efforts to prevent such information from being lost, stolen, leaked, falsified or damaged by taking the following technical, administrative and physical measures for security assurance:

- Minimum number of information workers and training

Personal information is made accessible to the smallest possible number of people and regular training is provided to such people.

- Regular in-house audits

In-house internal audits are conducted on a regular basis for the security of personal information.

- Internal management plan

An internal management plan is developed and implemented for safe handling of personal information.

- Encryption of personal information

Your personal information is password-protected and stored and managed in encrypted form. All data is encrypted for transmission and other important data is protected by separate security features.

- Technical measures against hacking

Personal information is protected by security software for the prevention of leakage, damage or tampering due to hacking or computer virus infection, and the software is periodically updated and tested. All systems are installed in access-controlled areas and technically and physically monitor and block access from outside.

- Limited access to personal information

We take necessary measures to control access to personal information by means of granting, modifying or canceling access to database systems that handle personal information, and a firewall system is employed to control unauthorized access from outside.

- Storage of access logs and prevention of data forging or tampering

We store and maintain a history of your access to our personal information processing system and use security features for your access log data not to be forged, tampered with, damaged, stolen or lost.

- Use of locks for document security

Documents and auxiliary storage media containing personal data are kept in safe, locked places.

- Prevention of unauthorized access

We have set up a separate physical location where personal information is stored and have established and implemented procedures for the control of access to the storage location.

8. Gathering of Opinions and Handling of Complaints

A. We value your opinion and feedback, and you are always entitled to have your questions answered in a serious fashion. We have set up a customer service hotline to effectively communicate with our customers.

[Customer Service Center] Contact number: 82-2-2230-3131

B. The customer service hotline is available from 09:00 a.m. to 06:00 p.m. All inquires by email, fax or mail will receive courteous responses within 24 hours after receipt thereof. However, if received after normal office hours or during weekends and holidays, such inquires will be answered on the following business day.

C. If you want to report a breach of your privacy or seek advice thereon, please contact:

- The Privacy Complaint Center (via privacy.kisa.or.kr or at 118);

- The Supreme Prosecutors' Office High-tech and Financial Crimes Investigation Division (via www.spo.go.kr or at 1301); or

- The National Police Agency Cyber Bureau (via www.ctrc.go.kr or at 182)

9. Privacy Officer

The Company has appointed the following departments and persons to be responsible for protecting its customers' privacy and personal information and for gathering their opinions and handling their complaints:

Privacy Officer		
Appointed as:	Privacy Officer	Privacy Contact Person
Name	Chun, Kyung-ki	Lee, Ho-jun
Department	Personnel Support	Hotel HR

Title/Position	Vice President	Manager
Phone Number	02-2230-3131	02-2230-3131
Email Address	mysungho.song@samsung.com	hj777.lee@samsung.com

10. Privacy Protection for Children under the Age of 14

The Company does not collect any personal information of our member customers' children under the age of 14 in compliance with the Juvenile Protection Act. If we need to collect personal information of the minors under the age of 14 with respect to our hotel business, we will get consent from their legal representatives or guardians.

11. Transmission of Advertising Messages

A. We do not send you any advertising messages for commercial purposes so long as your unsubscription request is expressly given.

B. If we send any advertising message by email or otherwise for online marketing purposes such as presenting product information, we will ensure that in a plain and legible manner:

- 'The email's subject line communicates what the email is about, although it may not indicate "Advertisement"; and

- The body text contains the sender's name, email address, phone number and mailing address, as well as instructions on how to unsubscribe, so that the recipient can readily unsubscribe from further advertisements.

C. Likewise, if we send you an advertising message for commercial purposes by fax or mobile text message or via non-email means, we will ensure that the sender's name is indicated in such message, even if you have agreed to the receipt of advertising messages.

12. Linked Sites

A. We may provide you with links to websites or materials of other companies, in which case we assume no responsibility for and make no guarantee as to the usefulness of such websites and materials over which we have no control.

B. If you move to another website by clicking a link appearing on the Company's website, we recommend that you carefully read the privacy policy of such website, as it is beyond the control of Hotel Shilla.

13. Posts

A. We value the comments, suggestions, opinions, statements and other content posted by our customers (collectively "posts") and use our best efforts to protect such posts from being tampered with, damaged or deleted. Notwithstanding, this does not apply to the following:

- Spam-like messages (e.g., chain letters and advertisements);

- Posts that defame others by disseminating false information to slander them maliciously; and

- Posts that reveal the identity of other users without their consent, infringe on third parties' copyrights or other rights or are irrelevant to the themes of the bulletin board.

- If a post is found to reveal the identity of other users, the Company may delete or correct part of such post in order to maintain and promote a healthy online community culture.

- If the content of a post is deemed movable to another section, the Company will provide a path in such posts to avoid misunderstanding or confusion.

- The Company may delete other posts deemed malicious or improper after giving express or individual warnings.

B.Essentially, you have rights to your posts and are responsible for them. It is difficult to protect information you disclose voluntarily via a post, so we recommend that you give careful consideration before such disclosure.

14. Changes to the Privacy Policy

If any change is made to this Privacy Policy by addition, deletion or correction due to a modification or revision in relevant laws, government policies or the Company's internal regulations, or a change of security technology, the Company will post such change immediately on its website.

Privacy Policy version: v5.0
Enforcement Date: 25 April, 1998
Amended date: 27 July 2007 [View previous version]
Amended date: 20 February 2012 [View previous version]
Amended date: 1 August 2013 [View previous version]
Amended date: 12 January 2018

This Privacy Policy shall come into full force and effect on the 12nd day of January 2018.