



THE GRAND MAYAN®

INTEGRAL PRIVACY NOTICE

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Vidanta Entertainment, S.A. de C.V., (Hereinafter referred as VE) is a mercantile company constituted in accordance with Mexican law, it is the company that operates and manages The Grand Mayan Hotel; located at the Vidanta Resort Los Cabos in San José del Cabos, Baja California Sur, México. Our company is committed to protecting your privacy in accordance with the Federal Law on the Protection of Personal Data held by Individuals (LFPDPPP), its Regulations and other applicable legal provisions (as a whole, Legislation). In addition to the provisions of the corresponding Mexican Legislation in this matter, we follow the best international practices in management and administration of Personal Data. In any case, we will handle your Personal Data with high standards of ethics, responsibility and professionalism. We put at your disposal this Privacy Notice in order to clearly and specifically inform you about the Personal Data we collect, the means by which they are collected, as well as the processing we give to them, always mediating our commitment to protect your privacy, under the highest standards of ethics, responsibility and professionalism.

A. IDENTITY AND ADDRESS OF THE DATA CONTROLLER:

Vidanta Entertainment, S.A. de C.V.

Blvd. San José s/n, Lote 12, Col. Campo de Golf, San José del Cabo, Baja California Sur, México, C.P. 23406.

B. CONTACT DATA OF PRIVACY OFFICER:

Email: datospersonales@grupovidanta.com

Phone: 52 322 226 4000 ext. 64713.

C. PERSONAL DATA COLLECTED:

For the purposes set forth in this Privacy Notice, VE may collect your Personal Data, which we collect through physical or electronic formats when you visit our Consumer Centers through our website: vidanta.com or by means other than those indicated always in accordance with the Legislation. The Data collected through the indicated means are:

1. IF YOU ARE A CLIENT, WE PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- 1.1. Identification Data.
- 1.2. Contact Data.
- 1.3. Financial Data.
- 1.4. Fiscal Data.
- 1.5. Biometrics Data.
- 1.6. Image Data in photograph and/or video.
- 1.7. Health Data in case of emergency or if you visit any of our facilities that justifies it.
- 1.8. Family information to notify in case of emergency.
- 1.9. Companions Data (registered persons) in the room or suite.
- 1.10. Identification Data of vehicle (license plates), if registered in the Resort.

As noted above, in case of being required or necessary we will treat health Data. When you request a service in our Consumer Centers, we will collect sensitive Personal Data, like health Data, to help us provide you a better service. If you do not want to provide us your health information, for your own safety, we will not be able to provide related services that require it. If you provide us your health information, you will state your express consent to your treatment, in accordance with this Privacy Notice.

2. IF YOU ARE A SUPPLIER, WE PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- 2.1. Identification Data.
- 2.2. Contact Data.
- 2.3. Fiscal Data.
- 2.4. Financial Data.
- 2.5. Biometrics Data.
- 2.6. Image Data in photograph and/or video.

3. IF YOU ARE A VISITOR, WE PROCESS THE FOLLOWING CATEGORIES OF PERSONAL DATA:

- 3.1. Identification Data.
- 3.2. Contact Data.
- 3.3. Image Data in photography and/or video.

Under oath, you declare that the Data you provide to VE and Consumer Centers is true, complete and accurate. Any false, incomplete or inaccurate information will be your sole responsibility.

D. PRIMARY PURPOSES OF PROCESSING PERSONAL DATA ARE THE FOLLOWING AND GIVE RISE TO LEGAL RELATIONS NECESSARY FOR THE PROVISION OF SERVICES BY VE:

1. IF YOU ARE A CLIENT:

- 1.1. For the fulfillment of contractual obligations, to identify you and verify the accommodation services provided.
- 1.2. For the provision of tourist services, such as: accommodation, concierge, room service, banquets, events and conventions, restaurants, Kids Club or spa, in case you request them.
- 1.3. For your security during your stay in VE, we establish security measures and surveillance of the facilities, including monitoring, video cameras, control and surveillance of physical and logical access.
- 1.4. For your attention in case of health or safety incidents.
- 1.5. To identify you in any type of legal or business relationship with VE or its subsidiaries.

- 1.6. To facilitate the provision of ground transportation services, from the airport to VE.
- 1.7. For the provision of golf course, academy and sports club services.
- 1.8. To inform you about changes in our products and / or services.
- 1.9. For the purchase of prepaid cards.
- 1.10. To make the collection and billing in your case, with respect to the services and / or products that you acquire.
- 1.11. For refund processes if applicable.

2. IF YOU ARE A SUPPLIER FOR VE:

- 2.1. Fulfillment of contractual obligations.
- 2.2. Billing of goods and services purchased.
- 2.3. Payment, reception and / or return of goods and services purchased.
- 2.4. Identification, verification and contact.
- 2.5. Security and controlling access to our premises.
- 2.6. Video surveillance.

3. IF YOU ARE A VE VISITOR:

- 3.1. Identification and contact.
- 3.2. Security and controlling access to our premises.
- 3.3. Video surveillance.

In addition, we use your personal information for the following secondary purposes that are not necessary for the requested services, but those purposes allow us to provide you a better service:

- To prepare studies and programs for marketing, advertising purposes of VE.
- For the maintenance of records oriented to the provision of services in the future.
- To send information on products and services, current or future that might interest you.
- To send advertising, promotions and newsletters that might interest you.
- For quality surveys of our products and / or services.
- To provide medical assistance if required or in your case to be attentive to the risks that could arise from the provision of some of our services.

In case you do not want your Personal Data to be used for any or all the secondary purposes, mark with an "x" inside the check box. If a box(es) is(are) not marked, you express your consent to treat your Data for the secondary purposes mentioned above. Refusing to use your Personal Data for these secondary purposes cannot be a reason for us to deny you services and products that you request or contract with us.

If you are reading this Privacy Notice on our website or have it available through any other means of electronic communication and you object to the processing of "Secondary Purposes" above mentioned, please contact our Privacy Officer to request it through the authorized formats, which you can find in the following link: <https://avisos.vidanta.com/formatosARCO/en/loscabos/SDA-SJD-VE.pdf>

E. PERIOD OF CONSERVATION OF YOUR PERSONAL DATA:

VE will keep your Personal Data during the contractual relationship with you; according to the terms established in the Fiscal Code of the Federation and applicable laws or until you ask us to eliminate them.

F. OPTIONS AND MEANS THAT THE RESPONSIBLE PERSON OFFERS THE HOLDER TO LIMIT THE USE OR DISCLOSURE OF PERSONAL DATA:

If you wish to express your refusal to receive promotions or commercial communications from us, you may request your registration in our Exclusion List by sending your request by certified mail addressed to the Privacy Officer to our offices located in Av. Paseo de las Moras, s/n, Fracc. Náutico Turístico Nuevo Vallarta, Bahía de Banderas, Nayarit, México, C.P. 63735. In the envelope containing your application, you must write or include in large and visible letters the inscription "URGENT: REQUEST TO LIMIT THE USE OR DISCLOSURE OF MY PERSONAL DATA".

G. MEANS OF EXERCISING RIGHTS OF ACCESS, RECTIFICATION, CANCELLATION, OPPOSITION, REVOCATION OF CONSENT TO THE PROCESSING OF YOUR PERSONAL DATA, DATA PORTABILITY AND THE RIGHT TO BE FORGOTTEN:

In order of law you can access, rectify, cancel or opposite to use and / or process your personal information, revoke the consent for processing of your Personal Data, request the right of portability of your Personal Data, as well as request the right to be forgotten as follows:

1. Access: If you want to know which Personal Data we have in our Database, for what we use them, and how we processing your personal information.
2. Rectification: If you want to request the rectification in one or more of your Personal Data in case they are wrong, need change or are incomplete.
3. Cancellation: If you want us to delete from our records and / or Database your Personal Data.
4. Opposition: If you want to object us the use of your Personal Data.
5. Data Portability: The holder / interested party may request their Personal Data granted to the responsible and / or request to responsible to transmit them to another responsible without his / her being prevented from doing so.
6. Right to be forgotten: To request the deletion of Data in the general internet search engines without delay, provided that they are no longer necessary according to their purpose, the consent is withdrawn or they are treated unlawfully.
7. Revocation of consent to the processing of your Personal Data: Request that your Data no longer be processed by VE.

To exercise any of the aforementioned rights, you must send your request in writing and by certified mail addressed to the Privacy Officer to our office located in Av. Paseo de las Moras s/n, Fracc. Náutico Turístico Nuevo Vallarta, Bahía de Banderas, Nayarit, México, C.P. 63735. In the envelope containing your application, you must write or include in large and visible letters the inscription "URGENT: ARCO RIGHTS REQUEST". For the purposes of the foregoing you or your legal representative may download the "ARCO Rights Exercise Format" that we make available through the following link <https://avisos.vidanta.com/formatosARCO/en/loscabos/SDA-SJD-VE.pdf> the request must be sent by certified mail and must be accompanied by the documentation that is indicated in the format, with the purpose that the "Privacy Officer" can authenticate your identity and / or that of your legal representative.

The "Privacy Officer", will communicate the answer to you or your legal representative within a maximum period of 20 (twenty) business days from the date on which the notification of your request takes effect. If your request is appropriate, it will be effective within 15 (fifteen) business days following the date on which you were notified of the response.

However, it is important to take into consideration that we will not be able to satisfy your request for ARCO rights in all cases, as it is possible that for some legal obligation, we will continue treating your Personal Data. If this is the case, we will let you know the corresponding obligations and proceed, if necessary, to block them for their conservation according to the period of time the law requires until their definitive disposal.

If you exercise your right of access to your Personal Data, we will offer you the following options (please indicate in your request which of the two options you want):

1. Send you by e-mail (or the address indicated in your request) your Personal Data in a declarative way. In that statement we will provide you with a complete list of all your Personal Data we have in our Database. When VE considers appropriate according to you, may mark different means to reproduce the information, always in accordance to the law.

1.1. If you wish to see the systems, covers, physical documents or Databases that contain your Personal Data, we will offer you the "right of access to website" through an appointment agreed with our "Personal Data Manager" at Av. Paseo de las Moras s/n, Fracc. Náutico Turístico Nuevo Vallarta, Bahía de Banderas, Nayarit, México, C.P. 63735. Such access will be available for no longer than 15 days from the date we respond to your request.

During your visit:

1.1.1. You will be allowed to see only your Personal Data. We reserve the right to block any confidential information, owner information, industrial secret, bank secrecy, technical secrecy, trade secret, professional secrecy or Personal Data of third parties.

2. The mechanisms and procedures so that, where appropriate, the Holder may REVOKE his consent to the processing of his Personal Data. In certain circumstances, the revocation of your consent, will imply (i) that the Data Controller can't continue providing the services you requested, or (ii) the conclusion of your business relationship with us:

2.1. By means of a separate sheet, you may request the revocation of your consent for processing your Personal Data by sending your request by certified mail addressed to the Personal Data Manager to our offices located at Av. Paseo de las Moras s/n, Fracc. Náutico Turístico Nuevo Vallarta, Bahía de Banderas, Nayarit, México, C.P. 63735. In the envelope containing your application, you must write or include in large and visible the inscription "URGENT: RIGHT OF REVOCATION".

For questions or more information regarding the procedure or means to (a) limit the use or disclosure of Personal Data, (b) exercise ARCO rights (access, rectification, cancellation and opposition), or (c) exercise the right to revoke consent, we provide the following contact details:

E-mail: datospersonales@grupovidanta.com or contact the "Privacy Officer" at the following telephone number: 52 322 226 4000 Extension 64713.

H. TRANSFER OF DATA:

VE will transfer your Personal Data and their purpose, are transferred to the following third parties:

ADDRESSEE OF PERSONAL DATA	PURPOSE	REQUIRES CONSENT
<input type="checkbox"/> Hakkasan Group	To send promotion and advertising.	Yes
<input type="checkbox"/> Subsidiary companies and specialized third parties	Satisfaction Assessment and Service Quality. Promotion and advertising delivery. Sending promotions and advertising related to hosting services.	No
<input type="checkbox"/> Hospital o medical services in the locality	For medical treatment or health services management, if necessary.	Yes
<input type="checkbox"/> Cape Travel, S.A. de C.V.	To provide transportation services if require.	Yes
<input type="checkbox"/> Banks	Process of payments and / or refunds if applicable.	No

In case you do not want your Personal Data to be transferred for some (or all) of these purposes, indicate it by marking with an "x" the checkbox at the left of each option. If the box (es) is (are) not marked, you state your consent to transfer your Data for such purposes and to those recipients.

If you are reading this Privacy Policy on our website or have it available through any other remote means of electronic communication and you do not want your Personal Data to be transferred for some (or all) of these purposes above mentioned, please contact our Personal Data Officer to request it.

I. MECHANISMS FOR THE PROTECTION OF YOUR INFORMATION:

1. Personal Data Security Management System.
2. Standards based on ISO 27001.
3. Security procedures for our staff.
4. Limited access to our facilities.

J. ELECTRONIC MEDIA, COOKIES OR WEB BEACONS:

We inform you that on our website we use cookies and other technologies through which it is possible to monitor your browsing behavior based on IP and the places where it comes from. The Personal Data we collect through forms are the name and email.

You can disable all cookies, avoid accepting new cookies, make your browser notify you when you receive a new cookie through the "help" button found in the toolbar and exist in most browsers.

K. MEANS OF COMMUNICATION FOR CHANGES AND / OR MODIFICATIONS TO THE PRIVACY NOTICE:

VE reserves the right to change this Privacy Notice at any time. If there is a change in this Privacy Notice, VE will communicate it posting a notice on our website <https://avisos.vidanta.com/en/cabve.pdf> for your safety and peace of mind, check at any time the content of this integral Privacy Notice on our web site to be informed about updates, changes or modifications.

L. DISPUTE SETTLEMENT:

In the event of a dispute arising from this Privacy Notice, the parties will first try to resolve it through negotiations in good faith and may be assisted by a professional mediator. If, after a maximum of 30 days of negotiation, the parties have not reached an agreement, the provisions of the Federal Law for the Protection of Personal Data in the possession of Private Individuals shall be complied with the National Institute of Transparency, Access to Information and Protection of Personal Data.

M. JURISDICTION:

By accepting this Privacy Notice, you waive any other jurisdiction and law that may apply. This Privacy Notice is ruled by Mexican laws, and any dispute will be resolved by the competent Mexican authorities.

N. LEGAL BASIS OF THE PRIVACY NOTICE:

- The LFPDPPP (Federal Law for the Protection of Personal Data Held by Individuals) which is the law that is responsible for protecting Personal Data held by individual in México.
- The RGPD (Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016) on the protection of natural persons, with regard to the processing and transfer of Personal Data, which is the new European Union regulation for the regulation of the treatment of Personal Data.

O. AUTHORITY:

If you believe that your right to the protection of your Personal Data has been damaged by any conduct or omission on the part of VE, or presumes any violation of the provisions of the Federal Law on Protection of Personal Data Held by Individuals, its Regulation and other applicable ordinances, may file their disagreement with the National Institute of Transparency, Access to Information and Protection of Personal Data (INAI).

P. VALIDITY:

This is the most current version of our Privacy Notice, which became effective as of February 14, 2018.
Last update august 06, 2019.



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