

Grace Hotels

Human Resources Privacy Policy

Introduction

Reference to “Grace”, “Grace Hotels” “the Company,” “our,” “we,” “us,” “our,” and other similar terms may refer to Grace Hotels (UK) Ltd and/or one or more of their direct or indirect subsidiaries or affiliates and/or the Grace Country Manager (as defined below).

In Grace Hotels we take privacy seriously. We have developed our privacy policies which apply to our employees and/or candidates (the “HR Privacy Policy” or “Policy”). While this HR Privacy Policy is intended to describe the broadest range of our personal information processing activities globally, those processing activities may be more limited in some jurisdictions based on the restrictions of their laws.

Please see below our HR Privacy Policy.

1. Grace Hotels and Grace Country Manager

- 1.1. Grace Hotels provides its facilities and services through companies which form part of the same corporate group as Grace Hotels (UK) Ltd. Grace Hotels (UK) Ltd is a data controller in respect of personal data obtained about you in connection with the use of our facilities and services.
- 1.2. Depending on the facilities and services, the entity which either manages and/or provides directly the relevant facility or service (“Grace Country Manager”) may also be a data controller in respect of your personal data.
- 1.3. A list of such facilities and services and the respective Grace Country Manager can be provided upon request. Please contact info@gracehotels.com for details of the Country Manager of the relevant facility / service included on this list.
- 1.4. This Policy explains how Grace Hotels collect and use your personal information in connection with recruitment and employment.

2. Collecting Personal Information

When you apply for a position with Grace Hotels we may collect personal information directly from you. We ask for certain data, including educational and employment background, contact information and preferences, job qualifications, and jobs for which you would like to submit an application. This information is necessary for us to process your employment application. If you do not provide it we may not be able to process your application and may not be able to offer you a position. You may choose to provide to Grace Hotels additional information, such as your CV, employment references and related information, and requests regarding salary or benefits.

In addition, Grace Hotels may collect information from third parties, for example in connection with initial and ongoing background, employment and social media checks and/or employment references. This information may consist of historical employment information obtained from former employers (e.g. employer references, career history), and social media information from social media sites (e.g. posts, likes and other content).

3. Sensitive Personal Information

In this Policy, “sensitive personal information” means details of your racial or ethnic origin, political opinions or beliefs, religious beliefs, membership in a trade union, physical or mental health or

condition, sexual orientation, commission or alleged commission of a criminal offence and any related proceedings.

Grace Hotels does not normally request sensitive personal information in connection with recruitment. If you have a disability and would like Grace Hotels to consider any workplace arrangements connected with the disability, you may provide that information during the recruitment process. In some countries we ask for information such as race or ethnicity for the purpose of monitoring equality of opportunity, but this is kept strictly confidential and is not made available to those conducting the recruitment process.

If we ask that you undergo pre-employment screening, this may in some cases involve the processing of sensitive personal information. Please see the section below headed "Pre-employment screening" for more information about this.

4. Use of Your Personal Information

Your personal information may be used to manage Grace Hotels' recruitment processes, for compliance with corporate governance, and for legal and regulatory requirements. We process your personal information for these purposes to meet our legitimate interests in dealing with your application and finding the best candidate for a position. If you are employed by us, the information will be used in connection with your employment and for managing our organization. We use your information for these purposes in order to comply both with employment law and with our obligations under your employment contract. It is also in our legitimate interests to use your information in order to manage our business efficiently and keep our records accurate and up to date.

If you submit your CV through one of our websites, we will use your personal information to process and assess your job application. We may also use your personal information to send you announcements of future job opportunities or for administrative purposes.

5. Pre-employment screening

In accordance with Grace Hotels' policies, pre-employment screening checks may be required for individuals being considered for employment, and are also periodically conducted for our employees. These checks may relate to employment history, credit history, education, qualifications, residence, nationality and visa/work permit status, information available on social media and records regarding criminal offences or criminal proceedings.

By applying for a position with Grace Hotels you are confirming that the information you have provided is correct and that you give permission for Grace Hotels and its contractors to carry out all necessary employment checks, which may involve the processing of sensitive personal information. All personal information generated by the screening process will be used solely for the purposes for which you have given consent. If you are selected for a position and requested to complete a background or screening check, please review the information below.

Grace Hotels' screening check partner is HIRERIGHT, LLC. When Grace Hotels initiates the process, HIRERIGHT, LLC will e-mail you a link to its online application, along with unique login and password information. You should promptly use that information to login and complete (in its entirety) the online form.

Grace Hotels' Human Resources team will assess the results of the information that HIRERIGHT, LLC provides and will check for inconsistencies between the information you provided during the screening process and the information listed on the CV you supplied to Grace Hotels during the application process.

It is your responsibility to verify the accuracy of the information you submit to Grace Hotels and HIRERIGHT, LLC. Providing inaccurate information about your education and/or employment history which cannot be substantiated, either on your CV, the Grace Hotels job application, or the HIRERIGHT, LLC application, may disqualify you from further consideration for employment with Grace Hotels.

If you have any additional questions about this process, please send an e-mail to info@gracehotels.com.

6. Data Recipients and Sharing with Third Parties

Grace Hotels may share your personal information internally and with service providers and other third parties as necessary in connection with recruitment and employment. Grace Hotels requires its service providers to keep your personal information confidential and to use it only for the specific purposes for which it was disclosed. Grace Hotels and its service providers may also use your personal information in an anonymised format (i.e. in a form in which your identity cannot be determined) for other purposes not specified above, including in the development and testing of products and services.

7. Security and Confidentiality

Except as otherwise stated in this Policy or as required for legal or regulatory purposes, Grace Hotels will keep your personal information in confidence and will not disclose it to third parties without your consent. Grace Hotels maintains, and requires its service providers to maintain, appropriate administrative, physical, and technical controls designed to protect the confidentiality and security of your personal information. Grace Hotels' employees who may have access to personal information are required to keep that information confidential.

8. Retention and Deletion

Grace Hotels may retain your information throughout the course of your application for employment. If your application is unsuccessful, Grace Hotels may retain your personal information for a reasonable period after your application is closed, during which Grace Hotels may consider you for other job opportunities. To the extent permitted or required by law, Grace Hotels may delete data at any time and you should retain a copy of any information you submit to us.

9. Your Rights in relation to your Personal Information

You may access, correct and (where it is inaccurate or no longer needed) delete personal information you have submitted to us. In certain circumstances you may also have the right under data protection legislation to object to our use of your personal information, to restrict our use of your personal information, and to be given a copy of your personal information in a commonly-used format to be provided, at your discretion, to another company.

If our processing of your personal information is at any stage based solely on your consent then you can withdraw that consent at any time, but please bear in mind that in most cases we will be processing your personal information on another legal basis.

If you wish to exercise any of these rights, you may do so by sending an email to Group HR Director Tim.Williams@gracehotels.com keeping cc the General Counsel, Naya.Boltetsou@gracehotels.com or by writing to Grace Hotels, 13-14 Hobart Place, SW1W 0HH, London, UK for the attention of the Group HR Director cc General Counsel. If you have any concerns about our use of your personal information, please contact us at either of these addresses and we will endeavour to resolve your concerns. You have the right to complain to the Information Commissioner's Office using their website

www.ico.org.uk. If you are resident in another EU country you may also complain to your local data protection regulator.

10. Your Responsibilities

You are responsible for the information you provide to Grace Hotels, and you must ensure it is honest, truthful, accurate and not misleading in any way. If you provide any information concerning any other person, such as individuals you provide as references, you are responsible for providing any notices and obtaining any consents necessary for Grace Hotels to collect and use that information for the purposes described in this Policy.

11. International Transfers

Grace Hotels carries on business in many countries, and has developed global data practices designed to ensure that your personal information is appropriately protected. Personal information may be transferred, accessed and stored globally as may be necessary for the uses and disclosures described above. These operations may be subject to different data protection laws than those in your home country.

12. General

Grace Hotels may update this Policy from time to time. If you have any questions or concerns about this Policy or its application, or if you believe your personal information has been used in a way that is not consistent with this Policy, please contact us at Tim.Williams@gracehotels.com keeping cc Naya. Boltetsou@gracehotels.com.

May 2018