PANDA HOTEL
悅 來 酒 店

Kowloon Panda Hotel Limited (referred to herein as "Hotel", "we", "us", or "our")

Privacy Policy ("Policy")

This Policy serves to inform you of the policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of personal data adopted by the Hotel in accordance with the Personal Data (Privacy) Ordinance Cap. 486 of the laws of Hong Kong ("Ordinance") and applicable data protection laws. This includes personal data collected offline at our Hotel, and online through our websites, applications (including mobile Apps) and third-party platforms (together referred to as "Sites").

We are committed to respecting your privacy and safeguarding your personally identifiable information. Providing your personal data to us is voluntary, however, if you choose not to provide mandatory information, we may not be able to provide you with the services, products or information you have requested.

Collection of Data

1. We collect technical information such as IP addresses, browser type, domain name and access times for security, operation and usage analysis. Where this information identifies, or can practicably be linked to, an individual, we treat it as personal data.

   We collect personal data from the following categories of sources:

   - **Directly from you:** Much of the personal data we process is information that you or someone acting on your behalf directly provides to us. For example, you may provide us with Contact and Identification Information, Demographic Information, and Health-related Information, when you create accounts, make reservations, complete surveys, participate in contests or promotional offers, contact customer service, use our Wi-Fi, or contact us via email, Apps, text, or chat, over the phone, in person, or through third parties.
   - **From your devices and our networks:** We use cookies and related technologies to collect personal data from and across devices when you interact with us through our Website, Application, emails, Apps or other online content or when your devices connect to, or are detected by, the wireless networks at our properties.
   - **From other businesses or individuals:** We work with business and marketing partners and social media platforms that give us personal data of customers from whom they have collected either directly or indirectly. We also receive your personal data from your friends and family, for example when a family member or friend makes a reservation or checks in on your behalf.
   - **From social media:** If you post to one of our pages on a social media site, we may receive your Contact and Identification Information (ID), and any other personal data contained in your social media posts or profile.

2. From time to time, it is necessary for you to supply us with personal data in connection with the provision of goods and/or services. You must provide us with the personal data marked with an asterisk or otherwise indicated as mandatory, otherwise we may not be able to process your requests or comply with our legal obligations. Failure to supply such data may result in us not being able to provide the goods and/or services.

Cookies and Tracking Technologies

3. We use cookies, pixel tags, web beacons, and similar technologies (collectively, "Cookies") to record visits, enable core site functionality (such as secure log-in and reservation progress), analyse site traffic, and deliver interest-based advertisements. You can manage or delete cookies through browser settings; however, disabling certain cookies may impact website functionality.

Use and Purpose of Data

4. By accessing or using this website, you acknowledge that you have read and understood this Policy. You may also be asked to confirm this acknowledgement when making reservations or submitting personal data through this website. Such acknowledgement does not constitute consent to direct marketing or replace any separate consent required by applicable law.

   With your consent or indication of no objection, we may use your name, contact details, and demographic information to send marketing communications by email, SMS/MMS, telephone, push notification, post, or social media (such as WeChat, Instagram, and Facebook). These communications may include information about our hotels, dining, products and services, membership programme, satisfaction surveys, events, offers and promotions.

   You may decline to receive marketing communications or opt out at any time, free of charge, by following the unsubscribe instructions in the relevant communications or contacting us at <info@pandahotel.com.hk >. Opting out will not affect necessary operational and transactional communications, such as reservation confirmations, check-in details and essential membership account notices.

5. We use your personal data for the purposes notified at collection or for directly related purposes. Unless an applicable legal exemption applies, we will obtain your express and voluntary consent before using your personal data for a new purpose. The use or provision of personal data for direct marketing is subject to the separate consent requirements described in this Policy.

   If you have become a member of our loyalty programme (if any), you may still receive service notices or non-direct marketing communications about the programme despite having opted out of receiving direct marketing communications from us without detriment to your loyalty benefits.

   Where we process your personal data that requires your consent or indication of no objection, we will ask for your consent or indication explicitly and only for the particular purpose.

   Where you provide personal data of third parties (e.g. names and contact details of family members or friends for reservation purposes), you acknowledge and confirm that the relevant third parties' consent to provide their personal data to us has been obtained.

6. Depending on the services requested and your interactions with us, we may collect the following categories of personal data, to the extent necessary for the purposes described in this Policy:

   - **Contact and Identification Information:** Names, contact details (such as telephone numbers, postal addresses and email addresses), professional titles, employers or professional affiliations, passport and visa information, and other government-issued identification information.
   - **Reservation and Stay Information:** Reservation details, arrival and departure dates, room and service preferences, details of accompanying guests, and records of services used.
   - **Payment and Transaction Information:** Information necessary to process payments, deposits, refunds and billing.
   - **Communications and Special Requests:** Enquiries, feedback, correspondence and special requests, including dietary or accessibility information voluntarily provided to help us arrange the requested services.
   - **CCTV Records:** Images and video recordings captured by CCTV systems in designated areas of our premises for security and safety purposes.
   - **Wi-Fi and Technical Information:** Information about your interactions with our Sites and networks, including Wi-Fi connection and usage logs, IP addresses, device identifiers and connection times.
   - **Authentication:** Login identifiers, relevant contact details, device information and authentication records associated with the methods used to verify your identity and secure access to our services, such as passwords, one-time verification codes sent by SMS or email, and device-based authentication.
   - **Loyalty Programme Information:** Membership details, account activity, points earned and redeemed, benefits used, preferences, and participation in membership offers and promotions.

7. You acknowledge and agree that your personal data is provided to and retained by us for the following purposes and for other purposes as shall be agreed between you and us or required by law from time to time:

   - the provision of any goods and/or services to you (including hotel accommodation and/or restaurant reservations and arrangements, membership-related services and responding to enquiries and requests for information or services);
   - the analysis, verification and/or checking of your credit, credit history and payment;
   - the ensuring of your ongoing creditworthiness;
   - the processing of any payment instructions, direct debit facilities and/or credit facilities requested by you;
   - the determination of the amount of debt owed to or by you and/or the processing and/or collection of amounts outstanding from you and those providing security for your obligations;
   - the performance, preparation and enforcement of any agreement between you and us;

- in connection with a proposed or completed merger, acquisition, financing or transfer of all or part of our business, subject to confidentiality and appropriate personal data protection safeguards;
- the meeting of the requirements to make disclosures under the requirements of any law; and
- any purposes directly related to the above.

8. Our websites do not sell products or services for purchase by children and we do not knowingly solicit or collect personal data from children. The Sites should be used only by individuals who are at least eighteen (18) years of age and can form legally binding contracts under applicable law. The Sites are not intended for and should not be used by minors.

Transfers of Personal Data

9. You agree that any personal data with respect to you or any other party which has been provided by you to us ("personal data") may be disclosed and transferred to the following locations or persons who shall hold, use, process, retain or transfer such personal data for the purposes described under Use and Purpose of Data and on a need-to-know basis:

    - our corporate office in Hong Kong and our hotel properties where you have booked, stayed at, or visited;
    - any agent, contractor, sub-contractor, credit provider, financial institution, service provider or professional adviser of ours or any other person under a duty of confidentiality to us;
    - booking engine and reservation platform providers, hosting and IT service providers, payment processors and guest communication providers engaged to process personal data on our behalf for reservations, payments and related hotel services;
    - any of our holding companies, their subsidiaries and any hotel in which the same has a direct interest;
    - any actual or proposed assignee or transferee of ours;
    - the group of the Hotel for the purpose of conducting research and/or analysis; and
    - any other party at your consent or instruction.

    We do not sell, rent, or transfer your personal data to external third parties for their own independent marketing purposes without your prior explicit written consent.

    Where we engage service providers to process personal data on our behalf, we adopt contractual or other means to require them to process the data only for the purposes for which it is entrusted to them, protect it against unauthorised or accidental access, processing, erasure, loss or use, and prevent its retention for longer than necessary. We also require appropriate safeguards to apply to any authorised sub-processors.

    Personal data may be transferred to, stored in or processed by recipients outside Hong Kong for the purposes described in this Policy. Where this occurs, we adopt appropriate contractual or other safeguards to protect the personal data in accordance with applicable legal requirements.

Your Rights

10. Under the Ordinance, you may request access to and correction of your personal data and information about our personal data policies and practices:

    - check whether we hold any personal data with respect to you;
    - access such of the personal data which we hold with respect to you;
    - require us to correct any personal data which is inaccurate;
    - ascertain our policies and practices (from time to time) in relation to the personal data and to be informed of the kinds of personal data held by us.

    Where another applicable data protection law provides additional rights, you may also have the following rights, subject to the conditions and exceptions under that law:

    - withdraw consent to the processing of your personal data;
    - erasure of your personal data;
    - restrict data processing;
    - object against profiling;
    - data portability; and
    - lodge a complaint with a supervisory authority (where applicable).

11. In accordance with the Ordinance, we have the right to charge a reasonable fee for the processing of any data access request.

    Any request for access to the personal data, correction of the personal data or information regarding policies and practices and kinds of personal data held by us or any request in relation to the rights described under Your Rights above should be in writing and addressed as follows:

    Kowloon Panda Hotel Limited
    3 Tsuen Wah Street
    Tsuen Wan
    Hong Kong
    Attn: Personal Data Administrator
    Email: info@pandahotel.com.hk

    You can also send written requests regarding access to the personal data or correction of the personal data addressed to the Hotel.

Security and Retention of Personal Data

12. We will retain the personal data only for so long as necessary to fulfil the purposes for which it was collected and for the purposes of satisfying our legal, accounting or compliance-related requirements.

    When we no longer need to use your personal data, we will delete it from our systems/records or take steps to anonymise such information so that you can no longer be identified from it (unless we need to keep your personal data for a longer period to comply with legal or regulatory obligations to which we are subject).

We adopt contractual or other means to prevent service providers processing personal data on our behalf from retaining it for longer than necessary. When a provider is replaced or its services end, we arrange for the secure return or deletion of personal data no longer required, subject to necessary transition arrangements and applicable legal requirements.

13. We maintain appropriate technical and organisational measures to protect the personal data you provide to us against accidental or unlawful destruction, loss, alteration, disclosure of, or access to your personal data.

    We assess suspected personal data breaches and take appropriate steps to contain the incident and mitigate potential harm. We notify affected individuals and relevant authorities as required by applicable law or otherwise where appropriate in light of the risks.

14. We may update this Policy from time to time. The latest version and its effective date will be published on our website. Where appropriate, we will notify affected customers of material changes. We will obtain separate consent where required by applicable law before implementing the relevant change.

15. This Policy has been translated into different languages. If there is any inconsistency or ambiguity between the English version and the other versions, the English version shall prevail.

Last updated: 13th November, 2026