

## INTEGRAL PRIVACY NOTICE

**Vidanta Entertainment, S.A. de C.V.**, (Hereinafter referred as **VE**) is a mercantile company constituted in accordance with the Mexican law, it is the company that operates and manages the OMNIA Dayclub, Herringbone, Casa Calavera and SHOREbar (Hereinafter referred as Consumer Centers), located at the Resort Vidanta Los Cabos in San José del Cabo, Baja California Sur, México. VE company is committed in protecting your privacy according to the Federal Law for the Protection of Personal Data held by Individuals (LFPDPPP), their Regulations, and other applicable legal provisions (jointly, Legislation). In addition to the provisions of the corresponding Mexican Legislation in this matter, we follow the best international practices regarding management and administration of personal data, we put at your disposal this Privacy Notice in order to inform you in a clear and specific way, what type of personal data we collect, the means by which we collect them, and the treatment we give to them; always mediating our commitment to protect your Privacy, under the most high standards of ethics, responsibility and professionalism.

In accordance with the applicable law, you agree, that the processing of your personal data shall be carried according to the following **Integral Privacy Notice**:

### A. IDENTITY AND ADDRESS OF THE RESPONSIBLE ENTITY:

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

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

### B. PERSONAL DATA COLLECTED:

For the purposes set forth in this Privacy Notice, VE may collect your personal data, which we offer through physical or electronic formats when you visit our Consumer Centers through our websites: [www.vidanta.com](http://www.vidanta.com) / [www.VE.mycard.net](http://www.VE.mycard.net), 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 **CUSTOMER OR TOURIST**, WE COLLECT THE FOLLOWING CATEGORIES OF PERSONAL DATA:
  - 1.1. Identification data;
  - 1.2. Contact data;
  - 1.3. Biometric data;
  - 1.4. Property data;
  - 1.5. Image photography and/or video;
  - 1.6. Fiscal data;
  - 1.7. Sensitive personal data.

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 a sensitive personal data, like a health data, to help us to give 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.

2. IF YOU ARE AN **EMPLOYEE OR CANDIDATE TO OBTAIN A JOB WITH VE**, WE TREAT THE FOLLOWING CATEGORIES OF PERSONAL DATA:
  - 2.1. Identification data;
  - 2.2. Contact data;
  - 2.3. Academic data;
  - 2.4. Property data;
  - 2.5. Ideological data;
  - 2.6. Health data;
  - 2.7. Biometric data;
  - 2.8. Image photography and / or video.

3. IF YOU ARE A **SUPPLIER**, WE TREAT THE FOLLOWING CATEGORIES OF PERSONAL DATA:
  - 3.1. Identification data;
  - 3.2. Contact data;
  - 3.3. Property data;
  - 3.4. Biometric data;
  - 3.5. Image 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.

### C. 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 **CUSTOMER OR TOURIST**:
  - 1.1. Identification, verification and contact;
  - 1.2. Changes in products or services;
  - 1.3. To provide a prepaid card;
  - 1.4. Billing services and products you buy;
  - 1.5. Collecting payment for services and products you buy from us;
  - 1.6. For your safety during your stay in **VE** we establish security measures and facilities surveillance, including monitoring, video cameras, control and surveillance of physical and logical access.
2. PERSONAL DATA WE COLLECT FROM YOU, AS AN **EMPLOYEE OR CANDIDATE TO OBTAIN A JOB WITH VE**:
  - 2.1. Identification, verification, contact and fulfillment of employment contract;
  - 2.2. Evaluation and service quality control;

- 2.3. Promotion and / or hiring processes;
- 2.4. Socio-economic and psychometric studies;
- 2.5. To provide a employment benefits;
- 2.6. Security and control of access to facilities;
- 2.7. Surveillance using video camera;
- 2.8. Health and safety care if necessary.

3. IF YOU ARE A **SUPPLIER FOR VE:**

- 3.1. Fulfillment of contractual obligations;
- 3.2. Payment, reception and / or return of goods and services purchased;
- 3.3. Identification, verification and contact;
- 3.4. Security and control of access to facilities;
- 3.5. Surveillance using video cameras.

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:

1.  Send information on products and services, current or future that might interest you;
2.  Send advertising, promotions and newsletters that might interest you;
3.  For quality surveys of our products and / or services.

In case you do not want your personal data to be used for any or all of 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 can not be a reason for us to deny you services and products that you request or contract with us.

If you are reading this Privacy Policy 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 Data Administrator to request it.

**D. 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".

**E. MEANS OF EXERCISING ARCO RIGHTS (ACCESS, RECTIFICATION, CANCELLATION AND / OR OPPOSITION) OR THE RIGHT TO WITHDRAW CONSENT:**

In order of law you can access, rectify, cancel or opposite to use and / or treat your personal information we collect of you, and revoke your consent to use the information, according to the following means:

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.

You may exercise your ARCO rights by sending your request by 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".

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 accordanceto 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, proprietary 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 owner may revoke his consent to the processing of his personal data. In certain circumstances, the revocation of your consent, will imply (a) that the Responsible can't continue providing the services you requested, or (b) 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](mailto:datospersonales@grupovidanta.com) or contact the Privacy Officer at the following telephone number: 52 01 322 226 4000 Extension 62586 and 64713.

**F. TRANSFER OF PERSONAL DATA:**

**VE will transfer your personal data and their purpose**, are transferred to the following third parties:

Recipient 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; Work transfers.	Yes
<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.	Yes

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.

**G. ELECTRONIC MEDIA, COOKIES OR WEB BEACONS:**

**VE** does not use cookies to collect Personal Data. We do not authorize our IT service suppliers to use tracking technologies to collect personal data automatically and simultaneously at the time the holder makes contact with them.

**H. PROCEDURES AND MEANS THROUGH WHICH THE RESPONSIBLE PERSON WILL NOTIFY THE HOLDERS THE PRIVACY NOTICE CHANGES:**

**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 <http://www.vidanta.com> or [www.VE.myicard.net](http://www.VE.myicard.net). For your safety and peace of mind, check at any time the content of this integral Privacy Notice on our website.

**I. 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.

**J. 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.

**K. Validity:**

This is the most current version of our privacy notice, which became effective as of February 14, 2018.