

Privacy Notice SSP APAC

1. Introduction

SSP cares about your privacy and data protection. This Privacy Notice explains how SSP APAC collects and processes your personal data/ personal information (“Personal Data”) when you visit our websites or other digital experiences (regardless of where you visit it from), when you purchase products and/or utilise our services via any of our points of sales (POS) at Travel Hubs, when you apply for a job at SSP APAC or when you otherwise interact with or are displayed content about SSP APAC, as required by the data protection laws in the territories in which we do business :

Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By visiting this website or our POS, you are accepting and consenting to the practices described in this policy.

Local-specific amendments referred to below also apply to consumers in those territories and may in some cases set out different standards due to applicable local laws, rules and regulations. If so, the local-specific amendment will govern in the event of a conflict.

2. Who is responsible for the processing of your Personal Data?

Select Service Partner Asia Pacific Limited and its affiliates and subsidiaries (collective as “SSP APAC”) is a group of company affiliates and subsidiaries of SSP Group plc. in Asia Pacific with presence in Hong Kong, Singapore, Philippines, Thailand, Indonesia, Australia, New Zealand and Malaysia (“we”, “our” or “us”). The data processing is carried out by or on behalf of the respective SSP entity in Asia Pacific which collects, stores and processes your Personal Data, as set out in Section 14 below. Such SSP entity may further share information with the whole SSP Group in accordance with the safeguard foreseen in this policy.

If you want to contact SSP APAC or the local country Data Protection Officer (if any), please see Section 14 for contact details.

3. The data we collect about you

The categories of Personal Data we may collect, use, store, and transfer about you depend on your activity and interaction with us, in which we have categorised as follows:

Categories of Personal Data	Personal Data Collected
Identity Data	first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and , gender
Contact Data	billing address, delivery address, email address and telephone numbers
Financial Data	credit card number, bank account and any other payment card details

Transaction Data	date, time , location and amount of transaction and other details of products and services you have purchased from us.
Technical Data	internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website, information about how you use the website.
Profile Data	your username and password created on our Career site, your interests, preferences, and feedback and survey responses
Marketing and Communications Data	(i) your preferences in receiving marketing from us and (ii) your communication preferences
CCTV Data	images and/or videos that may show your physical appearance
Job Application Data	When you apply for a job with SSP, we will collect information regarding your employment as well as your education information on top of Identity Data, Profile Data and Contact Data as part of the vetting process.

4. How is your personal data collected?

We use different methods to collect personal data from and about you including through:

- **Direct interactions** - you may give us your Identity Data, Contact Data ,Financial Data and CCTV Data by corresponding with us (by post, by phone or by email) or interacting with us (such as creating an account on our Career Site, requesting marketing communication to be sent to you, filling in feedback/ questionnaires, using our facilities and/or services at our POS).
- **Access to our website**- as you access to our website, we may automatically collect Technical Data about your browsing actions and patterns. We collect your Technical Data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources** - we may receive personal data about you from various third parties and public sources as set out below:
 - Technical Data from the following parties:
 - analytics providers such as Google based outside your country;
 - advertising networks based inside **OR** outside your country; and
 - search information providers based inside **OR** outside your country.
 - contact, financial and transaction data from providers of technical, payment and delivery services based inside **OR** outside your country.

- identity and contact data from publicly available sources

5. Why do we collect and process your personal data?

The purposes of processing your personal data electronically or manually are set out below. The following is our legal basis for processing your personal data, depending on the purpose:

- **Consent:** when you give us your consent, we will process your personal data for the specific purpose you have consented to.
- **Performance of Contract:** when making products and/ or services available to you, we will process your personal data necessary for fulfilment of a contract (such as sales of food at our POS) with you and to fulfil any obligations derived from that contract; where we need to perform a contract; or where we are about to enter into or have entered into with you.
- **Legitimate interest:** we may process your personal data when it is necessary for our legitimate interests such as for security purposes and fraud and loss prevention. Our legitimate interests do not outweigh your interests and fundamental rights as granted by the data protection laws.
- **Legal obligation:** whenever it is necessary for us to comply with a legal or regulatory obligation of the country of operation.

We may process your personal data on more than one lawful ground depending on the specific purpose for which we are using your personal data:

Purpose / Activity	Type of data	Legal basis for Processing
Signing up to SSP's mailing list	(a) Identity Data (b) Contact Data	Consent
Promotional and Marketing related purposes	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	(a) Consent; (b) Legitimate Interest

When you register an account on our Career Site and/or when you apply for a job at SSP via our Career Site	(a) Identity Data (b) Contact Data (c) Profile Data (d) Job Application Data	(a) Consent (b) Legitimate Interest
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Purchase/ Service-related Purposes such as processing payments, fees and charges.	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data	(a) Performance of Contract (b) Legitimate Interests
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To manage our relationship and communication with you	(a) Identity Data (b) Contact Data (c) (c) Marketing and Communications Data	(a) Consent (b) Legitimate Interests
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Service/ Product Improvement-related purposes such as collection of your opinion via surveys	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data (d) Technical Data	(a) Consent (b) Legitimate Interests
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Regulatory and legal obligations related purposes	(a) Identity Data (b) Contact Data (c) CCTV Data (d) Employment Data (e) Technical Data (f) Financial Data (g) Transaction Data	(a) Consent (b) Legal Obligation (c) Legitimate Interests
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CCTV surveillance related purposes such as loss prevention, crime detection and prevention, for the personal safety of guests, employees and other members of the public, etc.	(a) CCTV Data	Legitimate interests:
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Wi-Fi at our POS/ Lounge	(a) Technical Data	Consent
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6. To whom could we disclose your Personal Data ?

We may disclose your personal data with the third parties set out below for the purposes set out in paragraph 5.1 above:

(a) **Within the SSP Group:**

- to the extent permitted by law and taking into account the protection of your rights and freedom in respect of the processing of your Personal Data, and the consent you have given (if any), your Personal Data will only be accessible by a limited and defined number of recipients within the APAC network of SSP companies ("SSP APAC"). The full list is further detailed in Section 14 below. Such data access will strictly take place on a "need-to-know" basis in order for the recipients to fulfil the processing purposes in their capacity as data controllers (except for CCTV Purposes which are handled locally). We may transfer your Personal Data to another legal entity for the purposes of a collaboration, joint venture, corporate reorganisation, change of legal form or other similar event, and/or to provide you with the best possible service. In case of a merger or sale, your Personal Data will be permanently transferred to the successor company.
- If you are an existing or prospective customer of SSP or otherwise interact with SSP via digital services (except by way of a job application), only the SSP employees within SSP APAC that are working within the teams that need to have your information (e.g. customer relationship management, commercial management, legal, compliance, IT, client customer care, etc.) will have access to your personal data.

(b) Service providers (within and outside SSP APAC):

- Your personal data will generally not be disclosed to recipients outside the SSP Group. In some cases, however, SSP APAC makes use of external service providers acting on behalf of SSP APAC on the basis of contractual arrangements which will include strict data protection obligations.
- We will in particular provide your Personal Data to service providers or suppliers (this may include other SSP companies) as part of our normal business operations e.g. to carry out IT-related tasks, conducting our business, servicing you or protecting the security and integrity of our business.
- These include but not limited to IT maintenance, security and support service provider, hosting provider, payment provider, logistics provider, marketing and advertising partners, data analytics companies, event providers, digital service tools providers, mailing or emailing services or customer care center.

(c) Government, Court, Regulators, Public Agencies, etc.:

- We may, in limited cases, transfer to Personal Data pursuant to applicable laws and regulations to law enforcement agencies, government or public agencies or officials, regulators, courts and any other person or entity that has the appropriate legal authority where we are legally required or permitted to do so, to respond to claims, or to protect our rights, interests, privacy, property or safety.

(d) Other Digital Platforms

- There may be other third parties which may process your Personal Data for their own purposes (e.g. social media platforms such as Facebook, TikTok and Instagram), to the extent permitted by this policy. The processing by these entities is governed by their own privacy policies. You may check their privacy policies to understand how they manage your personal data. For avoidance of doubt, we do not disclose your personal data to these platforms unless you have consented so or if we have a legitimate interest to do so.

7. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We will develop and implement the following personal data control mechanisms:

7.1 Promotional offers

- We may use your identity, contact details, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).
- You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have opted in for receiving that marketing.

7.2 Third-party marketing

We will get your express consent before we share your personal data with any company outside the SSP group of companies for marketing purposes.

7.3 Opting out using unsubscribe links

You can ask to stop sending you marketing messages at any time by clicking the unsubscribe link sent in any email correspondence to you. However, opt out of receiving these marketing messages does not apply to the personal data provided to us as a result of a product/service purchase, registration, product or service experience or other transactions.

8. Cookies Technologies

Cookies are pieces of information that any website or other platforms may transfer your browser that are then stored in your computer/ device system. When you visit a website, that site's computer asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites.

Our website uses cookies and web server logs to collect information about how our website is used and your interactions with our website. Information that we gathered through cookies and web server logs includes the date and time of visits, the pages viewed, time spent at our website and the websites visited just before and just after our website.

Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our website and which parts of the website are most popular. This helps us gather feedback so that we can improve our website and better serve our customers.

You can switch off all non-essential cookies through the banner at the top of our website.

Please be aware that restricting cookies may impact your user experience and may prevent you from using parts of our website or Career Site.

9. Camera Surveillance (CCTV)

9.1 General Provisions regarding CCTV

In our POS, we may use CCTV surveillance as a vital security measure to protect customers, employees, visitors and our business. As such, we process images and videos which may capture your personal data through our CCTV surveillance systems. Such personal data may be used to protect individuals, facilities and equipment and all information contained therein from incidents, accidents, and malicious/ criminal attacks.

9.2 To whom could we disclose your CCTV Data?

Whilst all CCTV data are stored and processed locally in your country, we may share your personal data within the SSP Group and/or third parties (such as law enforcement agency) due to our legitimate interest and legal obligations.

Access may be granted to the third-party security companies providing installation and maintenance support services, as well as companies that provide loss prevention analysis services to SSP.

Any employees using CCTV will be given training to ensure that they understand and observe the legal requirements relating to the processing of any CCTV Data gathered.

9.3 For how long do we keep you CCTV Data?

The images/ videos shall be kept for 30 days after they were captured, unless they must be kept longer for international investigation and for evidencing the perpetration of acts against the safety of persons, assets or facilities, and in the latter case they are extracted from the systems and be kept for the duration of the investigation and/or the proceedings.

We will ensure that CCTV Data gathered is stored in a way that maintains integrity and security which may include encrypting the CCTV Data where it is possible to do so.

10. Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you to obtain your separate consent for doing so.

11. International transfers

As mentioned in Section 6 above, we may share and/or transfer your Personal Data outside of your country to another jurisdiction. Such jurisdiction may not provide the same level of data protection as your country.

In any event, such data transfers shall only take place on the basis of adequacy decision, the adoption of Standard Contractual Clauses (SCCs) and/or ASEAN Model Contractual Clauses (ASEAN MCCs), Binding Corporate Rule (BCRs), Certification and appropriate contractual clauses such as data processing agreement/ data transfer agreement.

Currently, we only transfer your Personal Data outside of your country based on the below mechanisms:

- Data transfers within SSP Group: SSP's Intragroup Data Transfer Agreement
- Data transfer to third-party service providers: adequacy decision, and the adoption of data processing agreement, SCCs, and/or ASEAN MCCs
- A transfer may take place based on your consent.

12. Data retention

12.1 How long will we keep your personal data

We will only retain your personal data for as long as it is necessary to fulfil the purpose(s) we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements as determined by applicable laws.

The criteria used to determine the period of storage of Personal Data is the respective statutory retention period as well as the purposes of which we process your Personal Data and whether we can achieve those purposes through other means. After expiration of the retention period, the corresponding Personal Data is routinely deleted, as long as it is no longer necessary for the fulfilment of the contract or legal obligations as permitted under applicable laws and our legitimate interest.

For CCTV Data, please refer to section 9.3 above.

12.2 Routine erasure and blocking of personal data

If the storage or purpose is no longer applicable, or if a storage period prescribed under the applicable data protection laws or another competent body expires, the Personal Data is routinely blocked or erased in accordance with prescribed legal requirements and our company's policy.

13. Your Data Subject Rights

You may have the following rights to the extent and as provided by the data protection law applicable to you which you can exercise through the contact details provided in Section 14 below:

13.1 What right do you have under data protection law?

Subject to the local data protection law, the data subject rights granted to you may vary. In the table below, we have included information as to which data subject right you may be able to exercise where SSP APAC operates.

Data Subject Rights	What does this mean?
Right to Confirm	You have the right to obtain confirmation from us as to whether or not your personal data is being processed by us.
Right to be Informed	Under the data protection law, you have the right to be informed in a concise, transparent, intelligible and easily accessible form of the Personal Data we hold and the way in which your Personal Data is processed.
Right to Access	You have the right to access your personal data stored by us, at any time and to obtain information about the purposes, categories of Personal Data, the recipients/ categories of recipients to whom the Personal Data have been disclosed to, etc. to the extent as permitted by data protection laws.
Right to Rectification	You have the right to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
Right to Withdraw Consent	If you have consented to any Personal Data processing activities, you can withdraw your consent at any time for future processing. Such withdrawal will not affect the lawfulness of the processing prior to the consent being withdrawn.
Right to Erasure (Right to be Forgotten)	In some cases, you have the right to erase your personal data without undue delay upon request where one of the following grounds applies. However, this is not an absolute right and SSP APAC may have legal or legitimate ground for keeping such Personal Data: - the personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed; - you withdraw consent and where there is no other legal ground for the processing;

	• you object to the processing and there are no overriding legitimate grounds for the processing; • the personal data having been unlawfully processed;
Right to Restrict Processing	Where such right is granted by the local data protection law, you have the right to restrict the processing of personal data, where one of the following applies: • if the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data; • if the processing is unlawful, and you oppose the erasure of the personal data and request the restriction of the third parties' use instead; • if we no longer need the Personal Data for the purposes of the processing but may be required in compliance with the applicable laws, for the establishment, exercise or defence of legal claims. • If you have objected to the processing pending the verification thereof, whether legitimate grounds are applicable to us, to override your objections.
Right to Data Portability	Where such right is granted by local data protection law, you have the right to receive Personal Data concerning you, which was provided to us in a structured commonly used machine-readable format. You also have the right to transmit your Personal Data to another controller without undue hindrance from us. This right only applies when the processing of your Personal Data is based on your consent or on a contract and that such processing is carried out by automated means.
Right to Object Processing	You have the right to object to processing of your Personal Data when such processing is based on the legitimate interest of SSP APAC. SSP APAC may, however, invoke compelling legitimate grounds for continue processing. If you object to the processing of Personal Data for direct marketing purposes (if any), we will no longer process the Personal Data for those purposes.
Right to Object to Automated Decision-Making	As a general practice, SSP APAC do not use automatic decision-making or profiling. Nevertheless, where granted by the applicable data protection law, you have the right not to be subject to a decision based solely on

	automated processing without human intervention, which produces legal effects concerning you, or similarly significantly affects you. If the decision is (a) necessary for entering into, or the performance of, a contract between you and us, or (b) based on your explicit consent, we shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, such as the right to obtain human intervention on our part, to express your point of view and contest the decision.
Right to File Complaint	You also have the right to lodge a complaint with your local supervisory authority.

13.2 How to exercise your data subject right?

To exercise your data subject rights, you can raise a data subject request (DSR) by contacting us via the methods specified in section 14 below.

When you send us a data subject request, we may need to request specific information from you such as your name, surname, e-mail and any other information necessary to help us confirm your identity in order for us to process the request. This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it.

13.3 How long does it take to process your data subject request?

We would respond to your DSR within the timeframe as prescribed by the local data protection law.

Country	Time Frame	Country	Time Frame
Australia	1 week	New Zealand	20 working days
Hong Kong SAR	40 calendar days	Philippines	30 working days
Indonesia	72 hours (for request to access, rectification or restriction)	Singapore	30 days
Malaysia	21 days	Thailand	30 days

Occasionally it may take us longer than the prescribed timeframe if your request is particularly complex or you have made a number of requests. In this case, we will notify you and let you know why it takes longer to process your data subject request.

14. How to Contact SSP APAC/ Local Data Protection Officer for Privacy Queries

For any questions or comments relating to this Privacy Notice or the manner in which SSP APAC collects and uses your Personal Data, you may also contact us at privacynotice@ssp.com.hk.

SSP APAC currently operates in Australia, Hong Kong, Indonesia, Malaysia, New Zealand, the Philippines, Singapore, and Thailand. As each SSP entity in the country is responsible for its personal data processing, below is a list of entity that you can contact in your country regarding your data protection right:

Country	Name of Data Controller & Address	Data Protection Officer Contact
Australia	SSP Australia Airport Concessions Pty Ltd. WA Airport Hospitality Pty Ltd. SSP Australia Catering Pty Ltd. SSP Australia Airport F&B Pty Ltd. Grimco Pty Limited Airport Retail Enterprises Pty Ltd. Address: Unit 405, 83 York Street, Sydney NSW 2000	By email: dataprotection@ssp-au.com
Hong Kong	Select Service Partner Asia Pacific Limited Select Service Partner Hong Kong Limited SSP AD Lounges HK Limited Address: Suites 1201-02 & 12112-1214, 12/F., North Tower, World Finance Centre, Harbour City, Tsim Sha Tsui, Kowloon, Hong Kong.	By email: privacynotice@ssp.com.hk
Indonesia	PT SSP Taurus Gamilang Indonesia Address: Jl. Raya Uluwatu Nomor 24X, Lingkungan Kelan Abian, Desa/Kelurahan Tuban, Kec. Kuta, Kab. Badung, Provinsi Bali, 80361	By email: dataprotection@sspindonesia.com
Malaysia	Select Service Partner Malaysia Sdn. Bhd SSP Services (Malaysia) Sdn. Bhd. SSPMY Serai Sdn. Bhd. Address: Unit A-3-6, TTDI Plaza, Jalan Wan Kadir 3, Taman Tun Dr Ismail, 60000 Kuala Lumpur	By email: dataprotection@ssp-my.com

New Zealand	Select Service Partner New Zealand Limited Address: Level 2, International Terminal, 30 Durey Road, Christchurch Airport, Christchurch, 8053, New Zealand	By email: dataprotection@ssp-nz.com
Philippines	Select Service Partner Philippines Corporation Address: JME Building No. 35 Calbayog St. Highway Hills, Mandaluyong City, Metro Manila, 1550 Philippines SSP-Mactan Cebu Corporation Address: Mactan Cebu International Airport, Airport Road, Barangay Ibo, Lapu Lapu City, Cebu, 6016 Philippines	By email: dataprotection@ssp.com.ph
Singapore	Select Service Partner Singapore Pte. Ltd. Address: 133 Cecil Street , #14-01 Keck Seng Tower, Singapore 069535	By email: dataprotection@ssp.com.sg
Thailand	Select Service Partner Limited Address: 88 The Parq Building 11 th Floor, Ratchadaphisek Road Klongtoey, Bangkok, Thailand 10110	By email: dataprotection@sspthailand.com