

# Standard Operating Procedure (SOP)

## Data Privacy and Guest Information Security Measures

**Purpose:** To outline data privacy and guest information security measures, ensuring the protection of personal information through proper protocols for collecting, storing, and handling guest data, securing records, managing access controls, compliance, audits, staff training, and breach response procedures.

### 1. Scope

This SOP applies to all employees, contractors, and systems handling guest personal information within the organization.

### 2. Definitions

- **Personal Data:** Any information relating to an identified or identifiable natural person.
- **Data Breach:** Unauthorized access, disclosure, or loss of personal data.
- **Access Controls:** Processes that restrict access to information based on roles and responsibilities.

### 3. Collection of Guest Information

- Collect only data necessary for guest services and legitimate business operations.
- Inform guests about data collection purposes and obtain consent where required.
- Record collection in accordance with applicable data protection laws (e.g., GDPR, CCPA).

### 4. Data Storage and Handling

- Store personal data in secure electronic systems with encryption, and/or locked physical files.
- Limit data retention to legally mandated periods and securely dispose of obsolete records.
- Ensure data backups are encrypted and regularly updated.

### 5. Securing Records

- Secure physical records in locked cabinets with restricted access.
- Implement strong passwords and two-factor authentication for electronic systems.
- Regularly update antivirus software and firewalls.

### 6. Access Controls

- Grant access to guest data only to authorized personnel based on job roles.
- Review access rights quarterly and revoke unnecessary permissions promptly.
- Log and monitor all access to sensitive data.

### 7. Compliance

- Comply with all applicable data protection regulations (GDPR, CCPA, etc.).
- Appoint a Data Protection Officer (DPO) or designated contact for privacy matters.
- Maintain up-to-date records of data processing activities.

### 8. Security Audits

- Conduct regular security audits of systems and processes handling guest data.
- Address audit findings and update procedures as needed.

### 9. Staff Training

- Provide mandatory privacy and security training for all staff upon onboarding and annually.
- Ensure staff understand procedures for identifying and reporting data privacy issues.

### 10. Data Breach Response

- Establish and communicate a data breach response plan.
- Immediately contain and assess any breach of guest information.
- Notify affected guests and regulatory authorities as required by law.
- Document incidents and corrective actions taken.

## **11. Review and Updates**

- Review this SOP annually, or when significant changes in regulations or operations occur.
- Update protocols and communicate changes to all relevant personnel.