



Complying with the Personal Data Protection Act has helped York Hotel to build trust and credibility with customers.

## **🔒 CHALLENGES**

Personal data protection is not new to York Hotel. However, further measures were needed to comply with the PDPA as practices were inconsistent between the various departments of the hotel.

## **📈 STEPS TAKEN**

- Attended training and workshops at PDPC
- Hired law firm to review data protection related terms used across customer touch points
- Reviewed business processes
- Developed SOP document, which includes complaints-handling processes

## **👍 Benefits**

- Builds trust and credibility with customers
- Customers more receptive to sharing personal data
- Reduces risk of sensitive personal information falling into the wrong hands

# Customers Rest Easy With Data Protection

***York Hotel has been obtaining consent from customers for its marketing efforts for the past three years.***

YORK Hotel is no stranger to safeguarding the personal data of its customers.

Since 2012, hotel customers who would like to receive information on marketing promotions and events are required to provide clear consent.

Take the hotel's annual Penang Hawkers' Fare lucky draw, for instance.

Each lucky draw form includes fields for customers to indicate if they would like to receive the hotel's marketing promotions via e-mail or telemarketing calls. Those who choose to do so have to sign on the forms, and provide their consent by ticking a checkbox.

Ms Audrey Liau, York Hotel's marketing communications manager, says: "The forms represent explicit consent and is a safeguard for us. We only contact customers who have provided such consent. We don't even contact those that indicated interest but did not sign off."

As an added measure, the forms filled by these customers would be shredded once the lucky draw is concluded to prevent unauthorised access to personal data.

Meanwhile, the signed forms of customers who have provided consent would be scanned and saved onto a password-protected PC, before being kept under lock and key.

The hotel had also implemented similar measures for guest comment cards, through which consent is sought for the purpose of contacting guests to learn more about their stay.

While personal data protection is not new to York Hotel, Ms Liau says further measures were needed in order to fully comply with the Personal Data Protection Act (PDPA).

The PDPA requires all organisations in Singapore to seek consent and notify individuals on the collection, use and disclosure of personal data for specific purposes. They must also safeguard all personal data under their care.

### **Acquiring Data Protection Know-How**

Ms Liao knows that training is key to getting buy-in from her co-workers in any compliance effort, but first, she needed to beef up her knowledge of the PDPA.

In early 2014, Ms Liao and the hotel's financial controller attended training workshops and briefings conducted by the Personal Data Protection Commission (PDPC) which were useful in providing an overview of the new data protection law.

They also took up a workshop on the fundamentals of the PDPA for non-legal personnel, a certified and subsidised course brought about by PDPC and the Workforce Development Agency (WDA).

The two-day course aims to help organisations deepen their understanding of the PDPA by going through key concepts under the PDPA, so that they are able to develop data protection policies and processes to meet their organisation's need.

Participants such as Ms Liao who have successfully completed the course and assessment will also be awarded with a Business Management Workforce Skills Qualifications (BM-WSQ) Statement of Attainment.

### **Ensuring Compliance**

With the newly acquired know-how, Ms Liao worked with a team of eight managers, including top executives, across the hotel to put together a SOP (standard operating procedures) document.

"Besides detailing the obligations of the PDPA – such as obtaining consent from customers – that we need to comply with, the SOP also includes business processes such as our internal processes for handling complaints," Ms Liao says.

"For example, if a guest says he has not given consent to be contacted but has received e-mails from us, we'll check the forms to see if that's indeed the case. We'll remove his personal information from our database if we find that consent was not given and apologise to the guest," she explains.

York Hotel also hired a law firm to review data protection related terms it had been using across customer touch points such as its website and lucky draw forms. "For example, they helped us to fine-tune the language that we should use to seek consent from customers," Ms Liao says.

A review of business processes by Ms Liao and her team also revealed that consent was not sought for contact information collected by the corporate sales department through lucky draw contests.

While the contact information could be business contact information, Ms Liao says some business customers provide their personal e-mail addresses in lucky draw forms. "We'd rather be safe and protect ourselves by seeking their consent upfront," she says.

With the SOP in place, Ms Liao and her team conducted training sessions to brief about 200 hotel employees on the new measures, and the need to comply with the law.

But the new rules took some getting used to by some employees. "We faced some resistance at first, as there was extra work for some staff," Ms Liao explains.

For one thing, the hotel's restaurant staff are now required to check the Do Not Call (DNC) Registry, before calling regular customers to market annual promotions such as Chinese New Year reunion dinners.

That said, the hotel's staff became more receptive to the new rules after they learned more about the PDPA through their training sessions and the benefits of compliance.

### **Building Trust and Credibility**

By taking on most of the training and policy development in-house, York Hotel spent just \$5,000 on training and legal fees to comply with the PDPA.

Ms Liao says the money was well-spent, as it has helped York Hotel to build trust and credibility with its customers.

"We are able to assure customers that their personal data will be sufficiently protected. Our customers are now more receptive to sharing their personal data," she says, adding that "compliance also reduces the risk of sensitive personal information falling into the wrong hands".