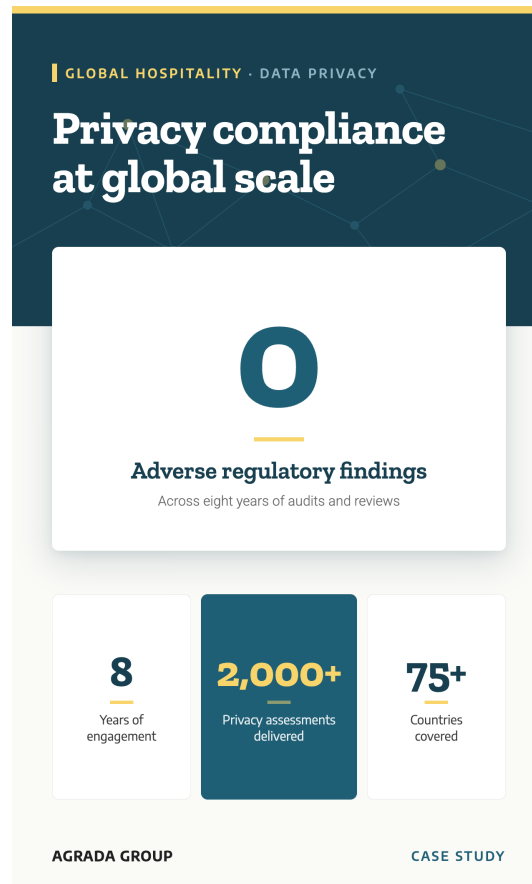


Privacy compliance at global scale: inside an eight-year hospitality engagement

Few data environments are as complex as global hospitality: millions of guests, loyalty members, and employees generate personal data around the clock, across dozens of jurisdictions and a portfolio that never stops growing. Here is how we keep one of the world's most recognized hospitality brands continuously compliant, and audit-ready, everywhere it operates.

AT A GLANCE

CLIENT	A leading global hospitality company
INDUSTRY	Hospitality
SERVICES	Data Privacy, Asset Inventory & Data Mapping (AIDM), Global Regulatory Compliance



Client Context

Our client is one of the world's most recognized hospitality brands, operating more than 1,300 properties across 75+ countries. With millions of guests, loyalty members, and employees generating personal data every day, from booking and check-in to dining and spa services, the organization's data landscape is vast, complex, and constantly in motion.

The Challenge

How do you protect guest data across a global brand that never stops growing?

As a high-profile multinational brand, the company is a natural target for regulatory scrutiny. The enforcement of the EU's General Data Protection Regulation and the emergence of China's Personal Information Protection Law created a compounding compliance challenge. Each regulation brought out distinct requirements for how personal data is collected, processed, stored, and transferred, and the organization needed to demonstrate compliance across both frameworks simultaneously, with new regional laws continuing to emerge.

The challenge was not simply legal. The company's portfolio grows through frequent acquisitions; five new brands were acquired during the course of this engagement alone, each introducing new systems, new data flows, new stakeholders, and new regional requirements. They needed a partner who could not only map what existed today but continuously adapt as the landscape shifted underneath them.

Our Approach

Large-scale discovery, relationship building, and a platform built to evolve

We began with a comprehensive asset identification and discovery effort spanning the client's global operations. Through extensive stakeholder interviews conducted across multiple departments, regions, time zones, and cultures, we identified processing activities at every level of the organization, from corporate headquarters to individual hotel properties.

Using OneTrust as the assessment platform, we developed custom templates designed to reflect the client's specific processing activities under GDPR and to adapt as requirements evolved. We then executed more than 2,000 assessments covering both legacy systems and newly acquired properties, ensuring that each of the five acquisitions during the engagement was onboarded into the compliance framework quickly and thoroughly.

What set this engagement apart was the depth of the relationship. Navigating cultural differences, language barriers, and time zone challenges across 75+ countries required more than a methodology; it required trust. We embedded ourselves within the client's teams, built rapport with stakeholders who had never engaged with privacy before, and became a seamless extension of their operations.

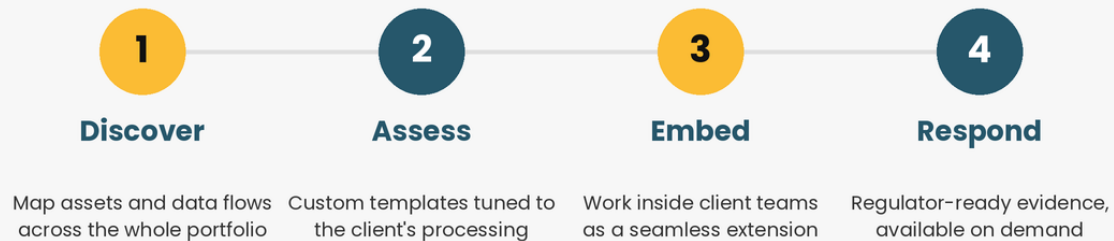
That trust was tested in late 2024 when a European data protection authority issued a legal inquiry into the company's data processing activities. Because the assessment infrastructure and documentation were already in place, we were able to directly assist the response effort, providing the evidence and analysis needed to address the inquiry efficiently and without escalation.

The engagement is now in its eighth year. The team, led by a senior manager and supported by managers and senior consultants, has flexed its composition throughout to match evolving needs. When new acquisitions bring new regions online, we rapidly identify new assets, build relationships with new stakeholders, and update the compliance framework, all without disrupting ongoing operations.

“We became a seamless extension of their operations.”

OUR OPERATING MODEL

How the engagement works, year after year



Results

Eight years, 2,000+ assessments, zero adverse findings

This engagement demonstrates that privacy compliance for a global brand is not a one-time project; it is an operating discipline. By combining deep regulatory expertise with cultural fluency and a platform built to scale, we have helped this leading hospitality company turn privacy from a liability into a competitive advantage: guests and regulators alike can trust that their data is handled with care, no matter where in the world they stay.

THE OUTCOMES

Five newly acquired brands onboarded into the compliance framework without disrupting operations

A European regulator's inquiry answered efficiently, with evidence already in hand, and closed without escalation

Custom OneTrust assessment templates that adapt as regulations evolve

Privacy turned from a liability into a competitive advantage for the brand

Ready to build a program like this? Visit agradagroup.com or contact our team.