



Welcome to our Privacy Policy

1 Introduction

We use your personal information in order to fulfil our commitment to providing an unparalleled guest experience in connection with all of your interactions with our site (the “Purpose”). As part of that undertaking, we are committed to safeguarding the privacy of the personal information that we gather.

As one of our guests or someone else with whom we do business, we collect, use and disclose your personal information in accordance with this Privacy Policy for Guests (this “Policy”).

2 The Application of this Policy

This Policy applies to personal information regarding guests and the other individuals from the European Union, United Kingdom and Switzerland with whom we do business and to the use of that personal information in any form, whether oral, electronic and/or written.

This Policy gives effect to our commitment to protect your personal information. While this Policy is intended to describe the broadest range of our personal information processing activities globally, those processing activities may be more limited in some jurisdictions based on the restrictions of their laws. For example, the laws of a particular country/region may limit the types of personal information we can collect or the manner in which we process that personal information. In those instances, we adjust our internal policies and/or practices to reflect the requirements of local law.

3 Types of Personal Information We Collect

The term “personal information” in this Policy refers to information that identifies or is capable of identifying you as an individual. The types of personal information that we process (which may vary by jurisdiction based on applicable law) include:

your name, gender, personal and work contact details, business title, date and place of birth, nationality, and passport.
guest stay information dates of arrival and departure, goods and services utilised, special requests made, observations about your service preferences (including room and vacation preferences).
your credit card details, payment method details;
any information necessary to fulfil special requests (e.g., health conditions that require specific accommodation or services);;
information collected whilst at our hotel Location through the use internet systems (including wired or wireless networks that collect data about your computer, smart or mobile device, or your location),



Much of the personal information we process is information that you or someone acting on your behalf knowingly provides to us. However, in other instances, we process personal information that we are able to infer about you based on other information you provide to us or during our interactions with you, or personal information about you that we receive from a third party (such as your travel agent, This Policy also applies to the personal information about you that we receive from a third party, unless specifically covered by such third party's privacy policy.

There may be instances in which the personal information that you provide to us or that we collect is considered Sensitive Personal Information under the privacy laws of some countries or regions. Those laws define "Sensitive Personal Information" to mean personal information from which we can determine or infer an individual's racial or ethnic origin, political opinions, religious beliefs or other beliefs of a similar nature, membership in a trade union or professional association, physical or mental health or condition, medical treatment, genetic data, biometric information, and information about an individual's sexual life or sexual orientation. In some very rare instances, financial records may constitute Sensitive Personal Information where you are located. If we rely on consent to process your Sensitive Personal Information, you have the right to withdraw that consent at any time. We only process Sensitive Personal Information in your jurisdiction if and to the extent permitted or required by applicable law.

Save to the extent required by law, you are not obliged to provide us with any of your Sensitive Personal Information, and should you choose not to, this will not prevent you from purchasing any products or services from us.

4 How We Use Personal Information

Subject to applicable laws, we may collect, use and disclose portions of your personal information in order to:

- provide and charge for hotel accommodation and other goods and services;
- provide you with a better or more personalized level of service, including information and services from a third party (such as additional guest services at our resorts local attractions and transportation options);
- facilitate services on your behalf, including restaurant and transportation transactions;
- fulfil contractual obligations to you, anyone involved in the process of making your travel arrangements (e.g., travel agents)

We use and retains your personal information for as long as is necessary to fulfil the purpose for which it is being processed, and in line with our legal and regulatory obligations and risk



management guidelines. For example, reservation records are retained for a period of five (5) years following the year in which the reservation was made, and sales contracts are retained for a period of Statute of Limitations plus ten (10) years. Personal information in records may be maintained for longer periods if subject to a legal hold or specific country/region requirement.

5 Disclosures of your Personal Information

From time to time, we may disclose your personal information. We would always make that disclosure in accordance with applicable law.

Circumstances where we might make such disclosure (in addition to those described in Section 4 above) include:

5.1 Legal Requirements

We reserve the right to disclose any personal information we have concerning you if we are compelled to do so by a court of law or lawfully requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain personal information collected and to process such personal information to comply with accounting and tax rules and regulations and any specific record retention laws.

5 Information We Collect When You Visit Us Online

If you access our website, you may wish to know the following:

6.1 You Can Browse Without Revealing Who You Are

You can always visit our websites without logging in or otherwise revealing who you are.

6.2 Usage Information

When you visit our websites, we collect information about how you use those websites. Examples of such information include the Internet Protocol address automatically assigned to your computer each time you browse the Internet, the date and time of your visit, the pages you access and the amount of time you spend on each page, the type of Internet browser you use, your device's operating system and the URL of any websites that you visited before and after visiting our website. That information is not linked to you as an individual unless you create a user profile, but we may keep records of the type of device being used.

6.3 Social Media

Our websites may also contain plug-ins and other features that integrate third party social media platforms into our websites. You will be able to activate them manually. If you do so, the third



parties who operate these platforms may be able to identify you, they may be able to determine how you use this website and they may link and store this information with your social media profile. Please consult the data protection policies of these social media platforms to understand what they will be doing with your personal data. If you activate these plug-ins and other features, you will be doing so at your own risk.

6.4 Links to Other Websites

If you visit our website and decide, for example, Travel Agents or Facebook, you may be seamlessly linked to websites maintained by third parties with whom we have contracted to provide those services. If you click on a link found on our websites or on any other website, you should always look at the location bar within your browser to determine whether you have been linked to a different website. This Policy, and our responsibility, is limited to our own information collection practices. We are not responsible for, and cannot always ensure, the information collection practices or privacy policies of other websites maintained by third parties or our service providers where you submit your personal information directly to such websites. In addition, we cannot ensure the content of the websites maintained by these third parties or our service providers, even if accessible using a link from our websites. We urge you to read the privacy and security policies of any external websites before providing any personal information while accessing those websites.

7 Minor Children

Our websites do not sell products or services for purchase by children and we do not knowingly solicit or collect personal information from children. If you are under the age of 18 (or a minor in the jurisdiction in which you are accessing our websites), you may only use our websites with the involvement of a parent or guardian.

8 Choice

You may always choose what personal information (if any) you wish to provide to us. However, if you choose not to provide certain details, some of your experiences with us may be affected (for example, we cannot take a reservation without a name).

If you provide us with your contact details (e.g., postal address, email address, telephone number or fax number), we may contact you to let you know about the products, services, promotions and events offered that we think you may be interested in. You can always choose whether or not to receive any or all of these communications by contacting us **9 Updating or Accessing Your Personal Information**

Under data protection law in Europe, you have various rights in relation to the personal information about you that we process.



With some limited exceptions, you have rights to access and update personal information held about you. If you want to inquire about any personal information we may have about you, you can do so by sending us a written request by letter or email to the addresses set out on our contact us page. Please be sure to include your full name, address and telephone number and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information we may require to make that determination. Where you make more than one request in quick succession, we may respond to your subsequent request by referring to our earlier response and only identifying any items that have changed materially.

You may request that we correct, delete, and/or stop or restrict processing or using personal information that we hold about you by sending a letter or email to the addresses set out in contact us page. If we agree that the personal information is incorrect, or that the processing should be stopped, we will delete or correct the personal information. If we do not agree that the personal information is incorrect we will tell you that we do not agree, explain our refusal to you and record the fact that you consider that personal information to be incorrect in the relevant file(s).

You may also seek to exercise your right to data portability by sending a letter or email to the addresses on our contact us page.

Finally, you may in some circumstances have the ability to object to the processing of your personal information on the grounds of your particular situation. You may do so by sending us a written request by letter or email to the addresses set out on our contact us page. If we agree that you are entitled to so object, we will cease to process your personal information.