

June 2018

## Privacy Policy

Vogue 99 Ltd seeks to deliver excellent service and satisfaction to all of our guests, as well as respect their privacy. To ensure that your personal information is protected and handled appropriately, we have prepared this privacy policy to inform you of our method to manage your personal information, which we obtain through the registration card and the online booking process. This privacy policy is part of Vogue 99 Ltd, the parent company of The Sands at Chale Island, whose terms and conditions govern our services. Please take a moment to thoroughly read the sections below.

### PERSONAL INFORMATION

#### 1. Type of personal information collected

Personal information is the information related to guest details that we request from all guests when making a hotel reservation either online or by telephone and when completing a guest registration card, for example name, nationality, booking periods, email address, payment details,

2. passport number, date of birth, telephone number and contact details. This personal guest information will be collected, processed and stored within the Vogue 99 Ltd guest database in accordance with this privacy policy.

#### 2. Purpose of collection

We collect personal information to communicate our news, events and promotions, including our products and services which we think may be of interest to our guests. We may also use such information for market research and quality control, as well as for statistical and analytical purposes, in order to deliver particular services or products which are in response to our guests' needs. Personal information will not be used for communication outside recognised business relationship guidelines.

#### 3. Customer's consent

By providing personal information on the registration card or through the online booking process, you are considered to have provided us express consent to obtain, own, use and share your personal information within Vogue 99 Ltd in accordance with this privacy policy. This consent is given voluntarily and may be revoked at any time by sending an email to [info@thesandsatchaleisland.com](mailto:info@thesandsatchaleisland.com)

#### 4. Ownership of the customer's personal information

Your personal information will become the property of Vogue 99 Ltd.

#### 5. Transfer of personal information across international borders

As an international hotel operator, we are committed to respecting your privacy and adhering to the principles of applicable data protection and privacy laws throughout the world. Please note that in order to meet changes in the relevant laws and regulations, guest satisfaction or business demand, Vogue 99 Ltd may from time to time amend this privacy policy. The



June 2018

updated version will be provided on our website to ensure our customers are aware of our most current policy.

#### PROTECTED INFORMATION

The term "protected information" refers to information that can be used to identify our guests individually. Protected Information includes but is not limited to guests' names, addresses, age, gender, method of payment information and passport/ID card number (whether in physical, electronic or other format).

How you may provide us with your protected information:

1. By making a reservation or by using any of Vogue 99 Ltd or its sister companies products or/and services
2. By providing it to us in communications regarding services such as comment cards
3. By providing the information to us by participating in marketing initiatives
4. By visiting our website

Purpose of collection:

We collect protected information for three primary purposes:

1. To enhance our ability to provide first-class customer service to our guests
2. To keep our guests informed of promotions and offers and
3. For marketing and research purposes

#### SECURE TRANSACTIONS

Vogue 99 Ltd directs all online transactions through a secure payment gateway (via 3G direct pay) for security of transactions and complete confidentiality.

#### DURING YOUR STAY

During your stay, we record your itemised spending to accurately assemble your folio, which sets out your room rate and other expenses billed to your room. We also record this information to comply with financial reporting requirements, including those imposed by our auditors and government regulators. Information particular to your stay may also be stored (i.e. health issues, payment difficulties). This stay-specific information is stored at the particular hotel where you stayed and is combined with information from previous visits that you have made to our hotels. We may also collect certain information as required by local laws (e.g. passport number). In addition, we may retain the content of any document (including comment cards, electronic documents such as emails and other similar forms of communication) that you send us before, during, or following your stay. This information may be shared within Vogue 99 Ltd but will not be shared with any third party.

#### GUEST'S CONSENT

By providing protected information on the registration card or through the online booking process or by other methods as mentioned above, you are considered to have provided Vogue 99 Ltd express consent to obtain, own,



June 2018

use and share your protected information within Vogue 99 Ltd and its subsidiaries in accordance with this privacy policy. This consent is given voluntarily and may be revoked at any time by sending an email to [info@thesandsatchaleisland.com](mailto:info@thesandsatchaleisland.com)

#### STORAGE OF PROTECTED INFORMATION

Vogue 99 Ltd takes steps to ensure that protected information is kept in a secure location, to which only authorised individuals have access. It is important to note that no email communication is fully secure. We recommend that you do not include any confidential information when using email. For your protection, our email responses to you will not include any confidential information.

#### PROTECTED INFORMATION PROVIDED TO THIRD PARTIES

We will only share protected information about you outside Vogue 99 Ltd without your consent where: (a) it is required or authorised by law; (b) it is required to provide you with services you have requested in which case you will be deemed to have given your consent; (c) if your stay has been paid for by a third party we will provide billing information to the paying party; or (d) if you have failed to pay amounts owed to a property.

#### GUEST ACCESS TO PROTECTED INFORMATION

We are happy to provide our guests, upon written signed request, with details of the protected information that we hold about them. We require that proof of identity be provided together with any such requests, typically in the form of a passport copy, together with contact information for the purposes of verification. Inquiries about protected information should be addressed to:

If at any point we decide to use protected information in a manner different from that stated in this privacy policy, we will notify you by letter or email correspondence sent to your last known address.