

TARU VILLAS PRIVACY POLICY

Taru Villas (Pvt) Ltd ("**Taru Villas**", "**we**", "**us**", "**our**") respects your privacy, and is committed to protecting the privacy, confidentiality and security of the personal data you provide to us or that we collect about you when you use our website (www.taruvillas.com), when you contact guest services, or when you otherwise interact with us. We are aware of our responsibilities to protect your personal data, to keep it secure and comply with applicable privacy and data protection laws. For the purposes of this Privacy Policy, "personal data" shall have the meaning as given to it by applicable privacy or data protection laws.

This Privacy Policy explains our personal data practices and the choices you can make about the way your personal data is used. This Privacy Policy gives effect to our commitment to protect your personal data and serves as the guidelines to be observed by all of the hotels, villas and properties managed and/or operated by Taru Villas or its affiliates and subsidiaries.

You will be asked to consent to the terms of this Privacy Policy when making a reservation, joining our loyalty program or mailing list, registering for events or promotions or otherwise corresponding with us via the Site or otherwise where required under applicable law. Subject to the requirements of applicable law, your continued use of the Site will constitute your deemed consent to the terms of this Privacy Policy.

Taru Villas (Pvt) Ltd (dataprotection@taruvillas.com), 65B Dharmapala Mawatha Colombo 3 Sri Lanka is responsible for using your personal data

TYPES OF PERSONAL DATA WE COLLECT

Information you provide to us: we collect personal data (including where applicable sensitive personal data) you provide directly to us. This includes:

- your full name and contact information, passport and visa information;
- guest stay information, including the hotels where you have stayed, date of arrival and departure, goods and services purchased, special requests made, your service preferences, telephone numbers dialled and email, faxes, telephone and other messages received;
- your credit card, mobile payment and other payment details;
- frequent flyer or other travel partner affiliation, employer details for partner programs and offers;
- any information necessary to fulfill special requests (for example, leisure, dining, travel and guest preferences);
- your reviews, feedback and opinions about our Hotels, Villas, programmes, events and services;
- information collected through the use of closed circuit television systems and other security systems; and
- any other personal data you choose to provide to us.

Information We Collect Automatically When You Use the Site:

when you access or use the Site, we automatically collect personal data about you, including:

- **Log Information:** we may collect system log information about your use of the Site, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Site.
- **Device Information:** we may collect information about the computer or mobile device you use to access our Site, including the hardware model, operating system and version, unique device identifiers (such as, IP address, IMEI number, the address of the device's wireless network interface, or mobile phone number used by the device) and mobile network information.
- **Location Information:** we may collect information about the location of your device each time you access or use one of our mobile applications or otherwise consent to the collection of this information. You can turn off location services for a device at any time, but this may turn off some useful features.
- **Information Collected by Cookies and Other Tracking Technologies:** we and our service providers use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Site and your experience, see which areas and features of our Site are popular and count visits. Web beacons are electronic images that may be used in our services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see our Cookies Policy below.

Information We Collect From Other Sources: we may also obtain personal data from our hotels / villas and from our third party service providers (such as information relating to the credit of guests) and from public sources and combine that with information we collect through our Site where we believe that it is necessary to help manage our relationship with you.

Where you provide personal data of third parties (for example, names and contact details of your family members in connection with bookings or family memberships), you confirm that you have their consent to provide their personal data to us. We recommend you show them this Privacy Policy.

Sensitive data

Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Services or otherwise to us, any Sensitive Personal Data (e.g., social security numbers, national identification number, data related to racial or ethnic origin, political opinions, religion, ideological or other beliefs, health, biometrics or genetic characteristics, criminal background, trade union membership, or administrative or criminal proceedings and sanctions). In the event that you do provide this information to us, we will only retain the sensitive information for the period required to carry out the Service for you (or to continue providing you with the requested Services). In

such a case that sensitive information is held by us, it will be done in a secure and safe manner with limited access.

HOW WE COLLECT, USE AND DISCLOSE YOUR PERSONAL DATA

Subject to the requirements of applicable law, we may collect, use and disclose your personal data for the purposes set out below.

For the performance of our agreement with you, in order to:

- process, confirm, provide and charge for hotel arrangements and restaurant reservations and our goods and services, and administer check in and check out;
- fulfill contractual obligations to you, anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers and your employer) and vendors (e.g. credit card companies, airline operators and other loyalty programmes);
- provide you with access to the content on our Site, and respond to your enquiries and requests for information and services; and
- administer, and disclose the winner of, contests and lucky draw competitions conducted by us or on our behalf.

For our legitimate commercial interests, in order to:

- understand how our products and services impact you, provide you with a better, more personalised level of service, and further develop our products and services, including linking or combining with information we get from others to do so;
- provide privileges, benefits and services to you, process applications for and administer membership programmes, verify and validate your ability to access and use certain products, services, facilities and information (such as member-only information), and administer loyalty programs, including as relevant regards points and rewards redemption;
- monitor your use of our Site and your bookings, and conduct analysis of the use of our Site in order to operate, evaluate and improve our Site and our services, understand your preferences, display customised content to you on our Site which may be of interest to you and troubleshoot any problems;
- conduct market analysis, market research, customer satisfaction and quality assurance surveys to improve our hotels, resorts and services; and
- managing and providing for the safety and security of guests, premises and services (including but not limited to carrying out CCTV surveillance and conducting security clearances).

To comply with legal obligations to which we are subject:

- meet legal and regulatory requirements and administer general record keeping.
- preventing, detecting and investigating crime and analysing and managing commercial risks; and
- conducting investigations.

Use of information based on your consent:

- facilitate direct marketing, promotional and customer management purposes, including sending you promotional communications (including without limitation emails and (where you opt in to receive) SMS's) or special offers if you have consented to receive the same. Please see section "**Direct Marketing**" below;
- we may use special categories of data (e.g. health data). But we will only do so if we have received your consent thereto; and
- for any other purposes for which we have obtained your consent, in accordance with the requirements of applicable law.

In addition, we collect, use, and disclose your personal data for the following purposes depending on the nature of our relationship:

- If you are a guest at our hotel(s), or a guest to events organised at our hotel(s):
 - (i) providing customer service and support;
 - (ii) creating and maintaining guest profiles in our system database;
 - (iii) administering debt recovery and debt management; and/or
 - (iv) any other purposes relating to any of the above;
- If you are a customer or guest at our spa, restaurants or bars;
 - (i) indemnifying our hotel(s) from liability related to your use of the spa or consumption of restaurant or bar food and drinks outside the restaurant or bar; and/or
 - (ii) any other purposes relating to any of the above.;
- If you are an employee, officer or owner of an external service provider or vendor outsourced or prospected by Taru Villas:
 - (i) managing project tenders and quotations, processing orders or managing the supply of goods and services;
 - (ii) processing payment of vendor invoices and bills;
 - (iii) maintaining internal communications; and/or
 - (iv) any other purposes relating to any of the above.

In order to register with our mobile application, make an online hotel reservation, enrol with a loyalty programmes or if you make an enquiry, you must provide us with the personal data marked with an asterisk or otherwise indicated as mandatory, otherwise we may not be able to process your request or comply with our legal obligations.

Disclosures of Your Personal Data

Subject to the provisions of any applicable law, we may share your personal data to the following entities and parties, for the purposes listed above (where applicable):

- between and among Taru Villas and a limited number of our affiliates as are relevant for the above purposes and to facilitate the operation of our business, but we shall only do so on a need to know basis;
- with the General Manager of the hotel or the hub of hotels which you book, stay or visit for the above purposes;
- with third-party payment processors, payment service providers, external banks, credit card companies, IT and marketing support service providers and other consultants, vendors and service providers who need access to such information to carry out work or provide services on our behalf or who help us to provide the Site to you;
- vendors or third party service providers in connection with marketing promotions and services offered by Taru Villas (please also see the section below on "Direct Marketing");
- with anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers ,your employer, our partners, foreign embassies) in order to fulfill contractual obligations;
- with any law enforcement, courts, Government or regulatory bodies (in whatever jurisdiction), or otherwise in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, court order or legal process;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of Taru Villas, our affiliates or others;
- any business partner, investor, assignee, or transferee (actual or prospective) in connection with, or during negotiations of, or to facilitate any business asset transactions (which may extend to any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company, or any change of management of a hotel);
- with our advisors, which includes our accountants, auditors, lawyers, other professional advisors and business contacts for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;
- with any other party at your consent or at your direction or whom you authorise us to disclose your personal data to; and
- otherwise as permitted or required by applicable laws and regulations.

We may also disclose aggregate or de-identified data that is not personally identifiable with third parties, including our commercial and strategic partners.

Overseas Transfers of Your Personal Data

Your personal data will be transferred to, and stored in the cloud, with back up locations in Australia and Singapore. It will also be accessed and processed by our personnel and the personnel of our partners, affiliates and third party service providers, who operate outside of Australia and Singapore. Your personal data will only be transferred to locations outside of Australia and Singapore where we are satisfied that adequate or comparable levels of protection are in place to protect personal data held in that jurisdiction, and (where we are required to do so) with your consent.

When personal data is transferred from the EU to outside the EU, we use Model Clauses, so ensuring that such data transfers are compliant with applicable privacy legislation.

Direct Marketing

From time to time, we would like to use your name, email address, mobile phone number, and other relevant contact information to send you either via emails, SMS messages, telephone calls, push notifications, post, or social media (e.g. Facebook) information that we think may be of interest to you, including about our hotels, products and services, news about our membership programmes (if you become a member of a Taru Villas loyalty program), satisfaction surveys, events, offers and promotions, but we can only do so with your consent.

We would also like to share (for gain) such data with selected third party entities, so that they may send you information, news updates, special events, offers and promotions as regards their products and services, including travel, transportation, retail, food and beverage, hotel accommodation, credit cards, financial and investment services, real estate, entertainment, publications, fashion and jewellery, leisure and sports, health and wellness, non-profit and charitable activities, telecommunications, social networking, media and public relations, but we will not share your personal data with such third parties or use your personal data for direct marketing without your consent.

You may, in accordance with applicable law, choose not to receive marketing communications or opt-out from receiving marketing communications at any time, free of charge, by following the unsubscribe instructions contained in the marketing communications or contacting Taru Villas in accordance with the section "**Your Rights and Contact Us**" below. If you opt out of these communications, we may still send you non-promotional communications, such as those about your reservation, unless we are prohibited from doing so by applicable laws.

Retention of Personal Data

To the extent required by law, we take reasonable steps to destroy, or de-identify or redact, personal data in a secure manner when we no longer need it for the purposes for which it was

collected (as set out in this Privacy Policy) and retention is no longer necessary for legal or business purposes. In any event, we do not retain your personal data for longer than six (6) years, subject to local laws and regulations.

Our Commitment to Data Security

Electronic copies of personal information are recorded on the Taru Villas computer system, which is backed up off-site by IT support contractors. Electronic records of personal financial details where provided, are stored on the Taru Villas database. Taru Villas have installed computer and network security systems, including password protection processes. Only staff authorised by the General Manager have access to hard copies and electronic copies of personal information. We have in place reasonable technical and organisational measures to prevent unauthorised or accidental access, processing, erasure, loss or use of your personal data and to keep your personal data confidential. These measures are subject to ongoing review and monitoring. To protect your personal data, we also require our third party service providers to take reasonable precautions to keep your personal data confidential and to prevent unauthorised or accidental access, processing, erasure, loss or use of personal data, and to act at all times in compliance with applicable data protection laws.

Hard copies of personal information are stored in locked offices or secure off-site storage areas until no longer required, after which they are securely destroyed. Hard copies of personal financial details where collected, are retained for information purposes only, not for re-use.

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. We also cannot guarantee that our Site will function faultless and without any interruptions. We shall not be liable for damages that may result from the use of electronic means of communication, including, but not limited to, damages resulting from the failure or delay in delivery of electronic communications, interception or manipulation of electronic communications by third parties or by computer programs used for electronic communications and transmission of viruses. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section, below.

Children and Minors

Except where required by local laws, we do not knowingly collect personal data from minors. If you are a minor, you may only use our Site and services with the permission of your parent or guardian.

If you are in the EU, our online services are not directed at children under the age of 13. If you believe we have collected information about a child under the age of 13, please contact us so that we may take appropriate steps to delete such information. If you are at least 13 but under

the age of 16, please get the consent of your parent or legal guardian before giving us any personal data about yourself.

Third Party Sites

The Site may contain links to other websites, apps, content, services or resources on the internet which are operated by third parties. If you access other websites, apps, content, services or resources using the links provided, please be aware they may have their own privacy policy, and we do not accept any responsibility or liability for these policies or for any personal data which may be collected through these sites. Please check these policies before you submit any personal information to these sites.

Your Rights and Contact Us

You are entitled to the following rights: right of access to the personal data we hold about you, right of rectification, right to erasure, right to restrict data processing, right to object against profiling and your personal right to data portability. Whenever reasonably possible and required, we will strive to grant these rights within one (1) month. You may also withdraw your consent to receiving direct marketing communications, or more generally to our processing of your personal data, at any time, and you may in certain circumstances ask us to delete your personal data. However, we may not be able to continue providing services to you if you entirely withdraw your consent or ask us to delete your personal data entirely, and this may also result in the termination of any agreements with Taru Villas.

If you would like us to update the data we maintain about you and your preferences, or if you wish to withdraw your consent to receiving direct marketing communications from us, please contact us by email at unsubscribe@taruvillas.com

For any other requests, or if you have any questions or complaints about how we handle your personal data, please contact our data protection officer by email at dataprotection@taruvillas.com or by post at 65B Dharmapala Mawatha Colombo 3 Sri Lanka

Changes to the Privacy Policy

We may modify this Privacy Policy from time to time. Any changes to this Privacy Policy will be posted to the Site so that you are always informed of the way we collect and use your personal data, and we encourage you to review this Privacy Policy whenever you access the Site or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. Updated versions of this Privacy Policy will include the date of the revision at the end of this Privacy Policy so that you are able to check when the Privacy Policy was last amended. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy on the Site. Use of the Site following such changes constitutes your acceptance of the revised Privacy Policy then in effect but, to the extent such changes have a

material effect on your rights or obligations as regards our handling of your personal data, such changes will only apply to personal data after the changes are applied.

Miscellaneous

This Privacy Policy is governed by and shall be construed in accordance with the laws of Sri Lanka

This Privacy Policy is written in the English language and may be translated into other languages.

In the event of any inconsistency between the English version and the translated version of this Privacy Policy, the English version shall prevail.

Last Updated: 5th August 2018

COOKIES POLICY

This policy ("**Cookies Policy**") is issued by Taru Villas (Pvt) Ltd (referred to as "**we**", "**us**", "**our**"). This Cookies Policy applies to our use of cookies in connection with our website www.taruvillas.com ("**Site**").

By continuing to use our Site, you are agreeing to our use of cookies in the manner set out in this Cookies Policy.

If you not wish to accept cookies in respect of your use of this Site, you should stop using the Site, or turn off your cookies (see paragraph 4), but this may affect the functionality of the Site.

1. WHAT THIS COOKIES POLICY COVERS

This Cookies Policy sets out:

- what a cookie is and why we use it (*point 2*);
- what you can do if you do not agree to the use of the cookies (*point 3*); and
- further information about cookies in general (*point 4*).

2. WHAT IS A COOKIE AND COOKIES ON THIS SITE?

After you enter the Site, the Site will make use of "cookies". Cookies are small text files containing small amounts of information which are downloaded and may be stored on any of your internet enabled devices e.g. your computer, smartphone or tablet - like a memory for a web page. This Cookies Policy provides you with information about why we use cookies. Our Privacy Policy sets out full details of the other information we may collect and how we may use your personal data. If you do not wish to accept cookies in connection with your use of this Site, you should stop

using it or turn off your cookies (see paragraph 4 below for how to do this) but this may affect the functionality of the Site.

Cookies are set for a number of reasons – to help you make online bookings, to help us analyse our site so we can make improvements and to help third parties conducting services for us on the site to function.

When someone visits taruvillas.com, we collect standard internet log information and user behaviour details to help us determine the number of people visiting various parts of the site. This data does not personally identify any site users.

Cookies are also set when you use any of the social media sharing buttons on our site (to post on Facebook, for example); Taru Villas has no control over the cookie policies of third-party social media sites.

We use Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes, and to help improve the overall experience on our Site. Google Analytics is a third-party web analysis service provided by Google Inc, which uses "performance cookies" and "targeting cookies" to analyse how you use the Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States. However, this website uses Google Analytics with the expansion '_anonymizeIp()' which means that Google will truncate/anonymise the last octet of the IP address for Member States of the European Union.

On behalf of us, Google will use the information collected for the purpose of evaluating your use of our Site, compiling reports on Site activity and providing other services relating to Site activity and internet usage to us. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser as described below. Furthermore you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout?hl=en-GB>. You may disable the use of Google Analytics by using the link [disable Google Analytics](#). This link creates an opt-out cookie which prevents the further processing of your data. For more information about Google Analytics cookies, please see Google's [help pages](#) and [privacy policy](#).

If you do not accept the use of these cookies, we cannot guarantee how our Site will perform for you.

3. CONTROL YOUR COOKIE SETTINGS

We shall store a cookie on your computer or device to remember this for next time. You can change your browser settings so that you receive a warning before certain cookies are stored. You can also adjust your settings so that your browser refuses most of our cookies or only certain

cookies from third parties. If you wish to withdraw your agreement at any time, you will need to delete our cookies using your internet browser settings. You should do this through the browser settings for each browser you use. Please be aware that some of our services will not function if your browser does not accept cookies. However, you can allow cookies from specific websites by making them "trusted websites" in your internet browser. The following links may assist you in managing your cookies settings, or you can use the 'Help' option in your internet browser for more details.

- Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>
- GoogleChrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>
- Safari: <http://support.apple.com/kb/PH5042>
- Opera: <http://www.opera.com/help/tutorials/security/privacy/>
- Adobe (flash cookies): <https://www.adobe.com/support/flash/downloads.html>

To block Google Analytics cookies specifically, you can install the "Google Analytics Opt-out Browser Add-on" provided by Google. If you share the use of a computer, accepting or rejecting the use of cookies may affect all users of that computer.

The above instructions on browser settings are relevant when you use or access our website www.taruvillas.com

4. OTHER INFORMATION

A guide to online privacy has been produced by the internet advertising industry which can be found at:

- <http://www.youronlinechoices.eu>
- <http://www.aboutads.info>

We may change this Cookies Policy from time to time by posting the updated version of the policy on our Site. Please check this Site periodically to be informed of any changes.

- Facebook (facebook.com) sets cookies to display personalised user marketing on other websites and track transactions made by you on www.taruvillas.com. For more information on how Facebook uses your data, please refer to <https://en-gb.facebook.com/policies/cookies/>

5. CONTACT US

If you have any questions about the cookies used on our website, please contact us at dataprotection@taruvillas.com

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