



Privacy Policy and Data Notice on Processing of Personal Data

Last updated: 21 Oct 2019

East Africa Camps, together with our holding company(ies), affiliates, subsidiaries and the hotels, vehicles or other properties that we own, operate or, respect the privacy of every individual who visits our Properties and/or uses any of our websites.

This Privacy Policy applies to personal data that:

Is provided to us when you stay or travel with us (or make enquiries to stay or travel with us) either by you or by a third party through whom you have made an enquiry or booking; and we collect from you when you visit any of **East Africa Camps** websites or which we obtain from any communications with you.

The following sections of this Privacy Policy describe the types of personal data we collect, how and for what purposes we use that personal data, with whom we share it, and the choices and rights available to you regarding our use of your personal data. We also describe the measures we take to protect the security of the personal data we hold and how to contact us about our privacy practices, and to exercise your rights.

1. Data Controller

WILDERNESS ECO SAFARIS S.L. is the **East Africa Camps** Group data.

2. Personal data we collect

2.1 Personal data you provide on a voluntary basis

We will collect, store and process information about you if you voluntarily provide us with such information in connection with the following:

filling in a form on any of our websites;

filling in a physical registration card;

opting in to receive marketing information with us;

creating an on-line account with us and managing your preferences;

contacting us by telephone or face to face (e.g. in the context of making a reservation);

sending us a letter, e-mail or social media message;

subscribing to receive a service from us (e.g. a newsletter, blog or by following us on social media);

requesting promotional information from us (e.g. information about any of our goods or services including **East Africa Camps** gift cards);

participating in a survey, competition or prize draw; or contributing content to us (e.g. for display on an **East Africa Camps** blog).

The types of information we may obtain include:

passport and visa data, payment data, travel history and details of joint travelers;

dates of your stay or travel with us and associated charges;

purchase or delivery of products or services;

reviews and opinions about our brands, products and services;

information we receive about you from any third parties through whom you have booked your arrangements;

and information we receive about you from other members of the **East Africa Camps** Group (which may include information relating to travel dates, details of payments made to us, special requests and other information relating to your personal preferences (e.g. food and beverage preferences and interests).



'Special category' personal data we do not collect data which is, by its nature, particularly sensitive (e.g. genetic data, biometric data, data revealing racial or ethnic origin, political opinions, sex life, sexual orientation, religion or other beliefs, data concerning health, criminal background or trade union membership) unless it is volunteered by you.

We may use certain sensitive (or "special category") personal data where you have given your explicit consent to us doing so, to better serve and meet your needs. Such sensitive data is only shared with other members of the **East Africa Camps** Group or our third-party service providers acting as data processors (e.g. excursion providers, restaurants, transport providers) for the purpose of providing the services you request and will not be shared or used by us for any other purposes.

Examples of sensitive personal data we may collect, and process include: food allergies; dietary requirements which may imply or suggest your religion, health or other sensitive personal data; mobility requirements; disabilities; and medical conditions.

2.2 Personal data we collect automatically

When you visit the **East Africa Camps** website, we may also collect certain data using "cookies" and other automated means. Cookies are small pieces of data that are stored by your browser on your computer's hard drive. Such data may comprise the following data:

date and time; originating IP address; domain name; type of browser and operating system used (if provided by the browser); URL of the referring page (if provided by the browser); object requested; completion status of the request; geographic location; or language preferences.

3. Use of personal data

As a provider of luxury hospitality experiences worldwide, **East Africa Camps** has a legitimate business interest in operating and improving its business and the services it offers. **East Africa Camps** therefore uses and processes your personal data to:

- help us create content that is relevant to our visitors;
- make improvements to our websites and social media pages and ensure that content on these is presented in the most effective manner for you;
- provide you with information, products or services that you request from us or which we feel may interest you;
- facilitate bookings, payment and other administrative processes related to your stay or travel;
- assess and help us understand general trends and patterns relating to our business;
- provide for the safety and security of our guests and visitors;
- manage general record keeping;
- enable us to compile anonymous, aggregated statistics that allow us to understand how users use our websites and to help us improve the structure of our websites;
- enable you to make reservations, buy **East Africa Camps** gift cards and payments;
- meet any legal and/or regulatory requirements;
- provide the products or services you request from us including providing personalized services; and
- improve our products and services and to ensure our products and services are of interest to you.

Even where **East Africa Camps** has a legitimate interest in processing your personal data, it will not do so to the extent that processing would override your interests, rights and freedoms to protect your personal data. We may also use your personal data to protect against and prevent fraud, claims, and other liabilities and to comply with or enforce applicable legal requirements, industry standards, and our policies and terms. We use personal data for these purposes when it is necessary to protect, exercise or defend our legal rights, or when we are required to do so by applicable law.

In the situations set out below, we will only process your personal data when you have given us your specific consent and you have the right to withdraw your consent at any time (see Your rights below): marketing and profiling purposes which are managed solely by **East Africa Camps** Management Limited as data controller for the **East Africa Camps** Group. Your decision to provide your data for such purposes is optional and will have no consequence on your ability to stay with us or benefit from the requested services;



all purposes concerning your booking, your stay and to provide you with the services you have requested, which are managed by **East Africa Camps** property(ies) you visit as joint controllers. Your decision to provide personal data (including special category/sensitive personal data) to us is voluntary, however, if you do not provide such personal data you may no longer be able to benefit from our services.

We may process your personal data by both automated and manual means. We may use your personal data in other ways for which we provide specific notice at the time of collection.

4. Sharing personal data

We do not sell, otherwise disclose, or share data we collect and hold about you, except as described in this Privacy Policy.

We may share your personal data with third parties as described below:

other members of the **East Africa Camps** Group, or our affiliated companies, which may use this data to offer products and services to you consistent with the purposes identified in this Privacy Policy;

third party service providers who have been appointed as data processors to perform functions and services on our behalf and who will be provided only with personal data necessary to perform the services on our behalf but are not authorized by us to use such data for any other purposes (e.g. providers of services in respect of web hosting, payment processing, information technology systems, customer relationship management, booking and reservations management, marketing, auditing, administration);

reservations management platforms used by you or **East Africa Camps** to make reservations at restaurants, third party providers of components of any package holiday, excursion, transfer, concierge arranged activity/experience or other service we arrange for you;

to our advisors and insurers in the event of a claim, dispute or where otherwise necessary;

where the **East Africa Camps** Property you visit is operated, but not owned by the **East Africa Camps** Group, the owner of that **East Africa Camps** Property (and its advisors and representatives);

if we are required to do so by law or pursuant to legal process or to comply with any applicable rules or regulations (including but not limited to the rules of the New York Stock Exchange), or in response to a request from a law enforcement authority or other government official; and we reserve the right to transfer personal data about you if we sell or transfer all or a portion of our business or assets, in accordance with applicable law. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use data you have provided to us in a manner that is consistent with this Privacy Policy. Following such a sale or transfer, you may contact the entity to which we transferred your data with any inquiries concerning the processing of that data.

5. Your rights

We will only send you marketing communications if you "opted in" to receiving such communications. You have the right to "opt out" of receiving marketing communications, whether by email or otherwise, at any time. You can do this by (i) clicking the unsubscribe link displayed in any of the marketing e-mails you receive, to indicate you no longer wish to receive marketing communications, or (iii) writing to us at the address set out in How to contact us below.

Pursuant to California's "Shine the Light Act", California residents are permitted to request information about the way we share certain categories of data with third parties for their marketing use.

If you are a "data subject" under applicable EU data protection law, you will have the following rights in relation to personal data that we hold about you:

Right to Access - to request confirmation of whether we process personal data relating to you, and if so, to request a copy of that personal data;

Right to Rectification - to request that we rectify or update any personal data that is inaccurate, incomplete or outdated;

Right to Erasure - to request that we erase your personal data in certain circumstances, such as where we collected personal data based on your consent, and you withdraw your consent;

Right to Restriction of Processing - to request that we restrict the use of your personal data in certain circumstances, such as while we consider another request that you have submitted, for example a request that we update your personal data;



Right to Withdraw Consent - where you have given us consent to process your personal data, to withdraw your consent; and Right to Data Portability - to request that we provide a copy of your personal data to you in a structured, commonly used and machine-readable format in certain circumstances.

To exercise your rights as set out above or to make a complaint or submit an inquiry about our privacy practices, please contact us at marketing@eastafricacamps.com. You can also contact our Data Protection Officer (see How to contact us below).

To help protect your privacy and maintain security, we may take steps to verify your identity before we can action your request.

6. Data transfers

We may transfer to, and store the data we collect about you in, countries other than the country in which the data was originally collected, including the United States, Canada or other destinations outside the European Economic Area ("EEA"). Those countries may not have the same data protection laws as the country in which you provided the data. When we transfer your data to other countries, we will protect the data as described in this Privacy Policy and comply with applicable legal requirements providing adequate protection for the transfer of data to countries outside the EEA.

If you are in the EEA, we will only transfer your personal data if:
the country to which the personal data will be transferred has been granted a European Commission adequacy decision;
the recipient of the personal data is in the US and has certified to the US-EU Privacy Shield Framework; or
we have put in place appropriate safeguards in respect of the transfer, for example we have entered EU standard contractual clauses with the recipient, or the recipient is a party to binding corporate rules.

You may request more information about the safeguards that we have put in place in respect of transfers of personal data by contacting us as described in How to contact us below.

7. How we protect your personal data

We maintain administrative, technical and physical safeguards designed to protect the personal data you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. Service providers and contractors who might have access to your data in order to provide services on our behalf will be contractually obliged to keep such data in confidence, provide adequate data security measures, and may not use that data for any other purpose.

For your own protection, we encourage you not to include sensitive personal data, credit card or similar personal data in any e-mails you send us or our staff.

8. How long we keep personal data for

East Africa Camps only retains your personal data for as long as needed to fulfil the purposes for which it is collected, unless we are required or permitted by law to keep the personal data for longer.

Your personal data will be anonymized or deleted if your last interaction with **East Africa Camps** was over 7 years ago. "Interaction with **East Africa Camps**" includes for example visiting an **East Africa Camps** Property or opening marketing communications from **East Africa Camps**.

9. Links to other websites

Our websites may provide links to other websites for your convenience and information. These websites operate independently from us. Linked websites may have their own privacy policies, which we strongly suggest you review. To the extent that any linked websites you visit are not owned or controlled by us, we are not responsible for the websites' content, any use of the websites, or the privacy practices of the websites.



10. Cookies

A "cookie" is an element of data that a website can send to your browser which may then be stored on your system. We use cookies to gather data about the visitors to our websites (as they enable us to improve our websites and deliver a better and more personalized service). We do not associate the data in a website visitor's cookie with any other data about that visitor.

The cookies we use on our websites, where you have accepted their use, are:

Cookie Name

Function

ARPT

Ensures that the user stays on the same server throughout their visit, ensuring consistent functionality throughout a visit. This cookie is destroyed at the end of the user's visit

JSESSIONID

Ensures that the user's session is maintained and works in conjunction with ARPT to ensure consistent functionality throughout a visit. This cookie is destroyed at the end of the user's visit

sifrFetch

Allows use of flash to improve display of text (if the user's browser supports it). This cookie is destroyed at the end of the user's visit

user_countrycode

lounge_user_countrycode

user_lang_pref

These three cookies allow us to keep track of the users' geographic location and language preferences in order to display them relevant targeted and localized content as applicable.

user_campaign

user_creative

user_placement

internal_user_campaign

internal_user_creative

internal_user_placement

These cookies allow us to identify which of our marketing campaigns or internal promotions a user has been directed from/measure the effectiveness of campaigns/promotions.

user_id

lounge_user_id

These cookies allow us to identify the user and customize their experience. They also allow us to pre-populate fields in tables with your data, assisting with form entry.

In addition, the following are the third-party cookies in use, where you have accepted their use (which are each subject to their own privacy and cookie policies):

Third Party Cookie

Function

Adroll

Adroll collects anonymous data on users of the Site. The technologies utilized allow Adroll to collect this data entirely anonymously and allow us to deliver interest-based advertising. Adroll's privacy policy can be found here <https://www.adroll.com/about/privacy>

AppNexus

AppNexus collects anonymous data on users of the Site. The technologies utilized allow AppNexus to collect this data entirely anonymously and allow us to deliver interest-based advertising. AppNexus' privacy statement can be found here <http://www.appnexus.com/platform-policy>

BidSwitch

BidSwitch to collect this data entirely anonymously and allow us to deliver interest-based advertising. BidSwitch's privacy statement can be found here <http://www.iponweb.com/privacy-policy/>

Bing

Microsoft collects anonymous information on users of the Site through to conversion to enable tracking of marketing. <https://privacy.microsoft.com/en-gb/privacystatement/>



DoubleClick Advertising

Allows us to monitor (using non-personally identifiable data) the number and type of relevant searches made for it on Google. Privacy policy available at <https://www.google.com/policies/technologies/ads/>

Facebook Custom Audience

Allows **East Africa Camps** to create an audience using data held by Facebook to deliver interest-based advertising <https://www.facebook.com/policy.php>

Facebook Like Button

Allows users to choose to show our websites on their Facebook site. Privacy policy available at <https://www.facebook.com/policy.php>

Google AdWords

Google AdWords collects anonymous information on users of the Site through to conversion to enable tracking of marketing. The technologies utilized allow AdWords to collect this information entirely anonymously. Privacy policy can be found here: <http://www.google.com/intl/en/policies/privacy/> You can opt-out of Google's use of cookies by visiting the Ads Preferences Manager, or through the Network Advertising Initiative opt-out page.

Google Analytics

Monitors usage of site (using non-personally identifiable data). Privacy policy available at www.google.com/intl/en/analytics/privacyoverview.html You can opt-out of Google's use of cookies by visiting the Ads Preferences Manager, or through the Network Advertising Initiative opt-out page.

Google Dynamic Remarketing

The East Africa Camps Group are using 'Remarketing' to advertise online. This means that third-party vendors, including Google, will show ads on sites across the Internet. Google will use cookies to serve ads based on past visits to this website. Privacy policy can be found here: <http://www.google.com/intl/en/policies/privacy/>

You can opt-out of Google's use of cookies by visiting the Ads Preferences Manager, or through the Network Advertising Initiative opt-out page.

Google +1 Button

Allows users to choose to show our websites on their Google + account. Privacy policy available at www.google.com/intl/en/+/policy/+1button.html

Unless you have adjusted your browser setting so that it will refuse cookies from our websites, our system will issue cookies. Most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. You can find out how to do this for your browser by clicking "help" on your browser's menu or by visiting www.allaboutcookies.org. Please note, however, that without cookies you may not be able to take full advantage of all our websites features.

11. Updates to our Privacy Policy

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our processing of your personal data and privacy practices. We will post a prominent notice on each of Belmond's websites to notify you of any significant changes to our Privacy Policy and indicate at the top of the Privacy Policy when it was most recently updated.

12. How to contact us

If you have any questions or comments about this Privacy Policy, the use of cookies, if you would like us to update personal data, we have about you or your preferences, or to exercise Your rights (as detailed above), please email our Data Protection Officer at sales@eastafricacamps.com or write to us at:

Wilderness Eco Safaris S.L.
Pasaje Gutierrez n6
47002 - Valladolid
Spain