

PRIVACY POLICY

Thanda Group (Pty) Ltd t/a Thanda Safari Private Game Reserve (“Thanda”)

THE POLICY

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 guidelines observed by our Head Office, Marketing and Reservations Team, as well as properties managed and/or operated by Thanda or its affiliates and subsidiaries.

We respect your privacy, and are 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.thanda.com or our mobile application and other online products and services (“Site”), when you contact guest services, or when you otherwise interact with us. This policy covers how, we collect, use, disclose, transfer and store data. If you book on behalf of others, you are responsible for ensuring that the others are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data to make a booking or enquiry. By making a booking or an enquiry, you agree to the transfer, storage and processing of the related data as necessary. We will take all reasonable steps necessary to ensure your data is treated securely and in accordance with this Privacy Policy. If you do not agree with this policy, we cannot accept your booking and you should not use this website. You will be asked to consent to the terms of this Privacy Policy when making a reservation, corresponding with us via the Site or otherwise where required under applicable law. Otherwise your continued use of the Site will constitute your deemed consent to the terms of this Privacy Policy. Thanda have a dedicated appointed data protection officer at dataprotectionofficer@thanda.co.za is responsible for using your personal data.

LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION

We process your personal information so that we can meet our legal, compliance and regulatory obligations, for legal purposes, such as to respond to a valid legal claim, summons or regulatory order, and to protect our property, rights and interests as well as the property, rights and interest of other persons. We also process your personal information for crime prevention and detection purposes, including the prevention of fraud for online payments, for identity verification, for credit checking and credit scoring purposes and accounting or audit purposes. In each case, we do so in compliance with applicable laws. We will only collect, process use, share and store your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- We need to use your personal information to perform a contract or take steps to enter into a contract with you. To manage your booking with us, to take payment for your booking, or to complete your travel arrangements;
- We need to use your personal information for our legitimate interest as a commercial organisation. We may also capture your interactions with our website and booking journey via tools on our website in order to identify errors or issues and ensure your customer experience meets expectations. In all such cases, we will look after your information at all times in a way that is proportionate and that respects your privacy rights;
- We need to use your personal information to comply with a relevant legal or regulatory obligation that we have. For example, in some countries, we are required to provide Advanced Passenger Information (“API”) to border control, customs and law enforcement officers at ports of entry and exit on your itinerary.

RIGHT TO OBJECT TO THE PROCESSING (INCLUDING DIRECT MARKETING) OF YOUR PERSONAL INFORMATION

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests. You can request that we stop contacting you for marketing purposes. You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes. If you have joined our mailing list, you can manage your marketing preferences automatically by clicking the "unsubscribe" link that you will find at the bottom of our emails which you receive from us, or you can unsubscribe by contacting us. Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction. You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it. You can also request that we erase your personal information where:

- It is no longer needed for the purposes for which it was collected; or
- You have withdrawn your consent (where the data processing was based on consent); or
- Following a successful right to object; or
- It has been processed unlawfully; or
- The personal information must be erased for compliance with a legal obligation under European Union or Member State law to which the we are subject.

We are not required to comply with requests to erase personal information if the processing of the information is necessary:

- For compliance with a legal obligation; or
- For the establishment, exercise or defence of legal claims.

PROFILING

We use personal information such as your date of birth, gender, country of residence, transactions (for example, payments made with us and flights taken), information derived from Cookies and your preferences and behaviours for profiling. Some of the legitimate purposes we profile personal information include:

- To better understand what you would like to see from us and how we can continue to improve our services for you, to personalise the service and offers you receive from us, including with invitations to special events.
- To provide you with tailored content online and optimise your experience of our Website.
- To share marketing material, we believe may be of interest to you, including from our third-party partners, and to help us operate our services more efficiently.

THE DATA COLLECTED

Data collected includes the following:

- guest stay information, including the Lodges, Game Reserves, Bed & Breakfast and 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;

- any information necessary to fulfil special requests (for example, leisure, travel and guest preferences);
- your reviews, feedback and opinions about our Game Reserve. Lodge, Villa and Intibane, programmes and services;
- information collected through the use of closed circuit television systems and other security systems; and
- your full name and contact information, passport and visa information and or any other personal data you choose to provide to us.

DATA AUTOMATICALLY COLLECTED WHEN USING THE SITE

Data automatically collected when using the site includes the following:

- **Log:** 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:** 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:** 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.
- **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 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](#).

Sources: we may also obtain personal data 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.

DATA SECURITY

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 seven (7) years, subject to local laws and regulations.

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. We 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. We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to protect the personal information that you share with us and safeguard the privacy of such information. For example, the measures we take include:

- Placing confidentiality requirements on our staff members and service providers.
- Destroying/permanently anonymising personal information no longer needed for the purposes for which it was collected.
- Following security procedures in the storage/disclosure of your personal information to prevent unauthorised access to it

COOKIES

A “cookie” is a small computer file which is downloaded to your device. It collects information as to how you navigate our Website and the internet and helps us provide better website services to you. Cookies may collect personal information about you. Cookies help us remember information about your visit to our website, like your departure point, and other settings and searches. Cookies enable us to understand who has seen which webpages and how frequently, and to determine which are the most popular areas of our website. They can also help us to operate our website more efficiently and make your next visit easier and customise your view of the website to reflect your preferences and activities.

TRANSFERRING PERSONAL INFORMATION GLOBALLY

Our offices and service providers are located around the world, which means your personal information may be transferred and stored in other countries which may be outside your country of residence. Some of these countries are subject to different standards of data protection than your country of residence. We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law, and we only transfer personal information to another country where:

- We are satisfied that adequate levels of protection are in place to protect your information; and
- The transfers are fully managed to protect your privacy rights and interests and are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.

STORAGE OF YOUR PERSONAL INFORMATION

We keep your personal information for as long as is reasonably necessary for the purposes for which it was collected. For example, to manage bookings and provide you with any relevant products or services, as explained in this Privacy Policy. We will ensure that it is disposed of in a secure manner. In most cases we will destroy your data 7 (seven) years after collection in order to comply with UK HMRC rules. Where no booking is made, data will be removed not more than 12 (twelve) months after collection. In some circumstances we may store your personal information for longer periods of time, for example, where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements. In specific circumstances, we may store your personal information for a longer time so

that we have an accurate record of your dealings with us in the event of complaints or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

RIGHT TO RESTRICT THE PROCESSING OF YOUR PERSONAL INFORMATION

You can ask us to restrict the processing of your personal information, but only where:

- Its accuracy is contested, to allow us to verify its accuracy; or
- The processing is unlawful, but you do not want it erased; or
- It is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- You have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- We have your consent; or
- To establish, exercise or defend legal claims; or
- To protect the rights of another natural or legal person.

COMMERCIAL INTEREST:

We also keep your personal information from a commercial point of view. This is so that we can:

- 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.;
- 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; and
- provide for the safety and security of guests.

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. WeChat and Facebook) information that we think may be of interest to you, including about Thanda, surveys, events, offers and promotions, but we can only do so with your consent. You may opt-out from receiving marketing communications at any time, free of charge, by following the unsubscribe instructions contained in the marketing communications.

DISCLOSURE: SHARING YOUR PERSONAL INFORMATION

We share your personal information in the manner and for the purposes described below:

- To improve the products and services we offer or help us to create new ones and for marketing, profiling and analytics as detailed below; and for the purposes described in this Privacy Notice.

- With third parties who help us manage our business and deliver our products and services. These third parties have agreed to confidentiality obligations and use any personal information we share with them or which they collect on our behalf solely for the purposes of providing the contracted service to us. These third parties include service providers who help manage our IT and back office systems, detect fraudulent transactions and security incidents, provide customer support, manage communications and tailor marketing; verify payments such as banks and payment card companies; provide internet services; host our facilities and conduct research that assists with understanding consumer interests.
- Bank and payment providers to authorise and complete payments.
- With governments, government organisations and agencies, border control agencies, regulators, law enforcement and others as permitted or required by law, in relation to API or such other legal requirements as apply from time to time when travelling to or from a particular country, and to generally comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies.
- With third parties whose products or services you are purchasing through our website or offices, or otherwise such as transfers and activities, tour and excursion providers, including if there is a problem with your booking so that your travel agent can resolve it with you.

WE MAY SHARE YOUR PERSONAL DATA

We may share your personal data for the purpose described below:

- between and among Thanda and a 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 Marketing Team and Front of house of Thanda which you book, stay or visit for the above purposes;
- with third-party payment processors, payment service providers, 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;
- with anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers) in order to fulfil 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 Thanda, our affiliates or others;
- in connection with, or during negotiations of, 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; and
- otherwise as permitted or required by applicable laws and regulations.

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 18, please get the consent of your parent or legal guardian before giving us any personal data about yourself. We do not knowingly collect personal data from minors

CHANGES TO POLICY

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.

ANALYTICS

We aggregate personal information and remove any identifying elements in order to analyse patterns and improve our marketing and promotional efforts, to analyse website use, to improve our content and products and services, to customize our website's content, layout, products and services, and to support our business operations and we may appoint third parties to do this on our behalf. We gather certain usage information like the number and frequency of visitors to our website. This information includes which webpage you just came from, which webpage you next go to, what browser you are using, your device ID and your IP address. This collective data helps us to determine how much our customers use parts of our website, and do research on our users' demographics, interests, and behaviour to better understand and serve you. One of the ways we do this is by installing and using Cookies on your browser or device. If you use buttons on our website linked to social media or similar sites (for example, "Like" and/or "Share" buttons), content from our Website may be sent back to those sites and, depending on your privacy settings, may be privately or publicly visible (for example, to friends, followers or generally to anyone who has access to your profile page).

LINKS TO OTHER SITES

Our Services may contain links to websites and services that are owned or operated by third parties (each, a "Third-party Service"). Any information that you provide on or to a Third-party Service or that is collected by a Third-party Service is provided directly to the owner or operator of the Third-party Service and is subject to that owner's or operator's Privacy Policy. We're not responsible for the content, privacy or security practices and policies of any Third-party Service. To protect your information, we recommend that you carefully review the privacy policies of all Third-party Services that you access.