



SERENA HOTELS

SAFARI LODGES AND CAMPS

HOTELS • RESORTS

# PRIVACY POLICY

## Introduction

Your privacy is important to us, and we are committed to protecting your personal data.

This policy shows you how we use your personal data when you interact with us, when we welcome you as our guest and when you visit our website.

If you have any questions, please see how to contact us about privacy below.

## How we collect your data?

We collect and receive data in different ways. Here is an explanation of how we do it.

When you are a guest at any of our hotels you may give us data in person when you:

- check-in and check-out
- give us your business card

- make use of our accommodation, facilities and services including out-sourced and 3<sup>rd</sup> party services
- attend our events
- interact with our staff and other guests
- Log in to our wireless network

You may give us data when you interact with us remotely via this website, by post, phone or email, or through chat or social media when you:

- sign up to receive our newsletter or other direct marketing
- make enquiries or request information, or correspond with us
- book accommodation, hospitality services or spa treatments
- engage with us on social media
- register for Prestige Club

We may get some data automatically when you interact with us:

- by accessing this website and the address of a referring website, if any
- from technology partners who help us run our mailing list sign-ups
- by accessing wireless services at any of our facilities
- from providers of payment
- from analytics providers
- from feedback partners

### **The personal data we may collect from you**

Some of the data collected, as explained above, may be personal data. Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data) below shows the type of personal data we collect that depends on how you interact with us.

- **Identity Data** - includes title, first name, middle name, last name, identification documents such as national ID or passport number, nationality, gender, date of birth, images, videos and audio via security cameras in public areas within our properties, username or similar

identifier and an encrypted version of your login/password. If you interact with us through social media, this may include your social media user name.

- **Contact Data** - includes mailing address, email address and telephone numbers.
- **Profile Data** - includes your username and encrypted password, your interests / preferences, feedback responses, as well as any data which we have added (for example, using analytics).
- **Technical Data** - includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, platform and other technology on the devices you use to access this website.
- **Usage Data** - includes information about how you use our website, products and services.
- **Tracking Data** - includes information we collect about you from cookies.
- **Marketing and Communications Data** - includes your preferences in receiving direct marketing materials from us.
- **Sensitive personal data** – includes but is not limited to: marital status, health, family details including (names of your children, parents, spouse or spouses), sex or sexual orientation, health status, race and financial information and transaction data.

Kindly note, if you choose not to share certain personal data with us, we might not be able to provide the products and services you have asked for.

### **Information collection in relation to children**

We collect a variety of personal data about our guests and visitors at our various properties and on the website. As our website is not intended for children, we do not knowingly collect data relating to children.

If you are under 16 and would like to use our website, please ask a parent or guardian for assistance.

We would however like parents and guardians to be informed that their children's images may be captured via our security cameras at our various properties.

### **How we use your personal information**

We will use your personal information in the following circumstances:

- To enter into a contract with you. For example, when you check-in at one of our properties, that is a contract.

- To comply with a legal obligation. For example, keeping records for tax returns.
- When we have consent from you to receive direct marketing materials from us.
- To request your evaluation of your stay with us.
- To ensure safety of all our personnel and guests staying in our properties.
- To respond to your customer-service enquiries or requests.
- To enhance our services through analysis of collected data and feedback.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

### **Purposes for which we will use your personal data**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of personal data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer and Reservation management	(a) Identity data (b) Contact data (c) Financial data (d) Transaction data (e) Marketing and communications data	Performance of a contract with you  Necessary for our legitimate interests (to recover debts due to us)  Legal obligations relating to financial transactions, such as the obligation to maintain books and records

<p>To process and deliver your order including:</p> <ul style="list-style-type: none"> <li>(a) Manage payments, fees and charges</li> <li>(b) Collect and recover money owed to us</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity data</li> <li>(b) Contact data</li> <li>(c) Profile data</li> <li>(d) Transaction data</li> <li>(e) Marketing and Communications data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to recover debts due to us)</li> </ul>
<p>To manage our relationship with you which will includes:</p> <ul style="list-style-type: none"> <li>(a) Notifying you about changes to our terms or privacy policy</li> <li>(b) Asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity data</li> <li>(b) Contact data</li> <li>(c) Profile data</li> <li>(d) Marketing and Communications data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal obligation.</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>(a) Identity data</li> <li>(b) Contact data</li> <li>(c) Technical data</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the</p>	<ul style="list-style-type: none"> <li>(a) Identity data</li> <li>(b) Contact data</li> <li>(c) Profile data</li> <li>(d) Usage data</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow</p>

effectiveness of the advertising we serve to you	(e) Marketing and Communications data (f) Technical data	our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Usage data (b) Technical data	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about our services that may be of interest to you	(a) Identity data (b) Contact data (c) Profile data (d) Usage data (e) Marketing and Communications data (f) Technical data	Necessary for our legitimate interests (to develop our products/services and grow our business)
Loyalty Programs and Guest Rewards	(a) identity data (b) contact data (c) stay history (d) Financial data	Contractual necessity  Legitimate interests
Security and Guest safety	(a) video surveillance data (b) identification data (c) check-in and checkout data	Legitimate interest
Conferences & Events	The purpose involves various activities in the hospitality industry, including communication with customers for event planning, facilitating reservations and bookings, engaging in pre-event logistics, coordinating events based on customer instructions, preferences, and expectations, facilitating catering,	Performance of contract  Legitimate interests, such as responding to customer complaints or concerns relating to an Event

	handling billing and payment processing, performing credit checks, addressing customer requests and complaints, and communicating with participants during events.	Legal obligations relating to financial transactions, such as the obligation to maintain books and records
Emergency and incident Response	This purpose involves various activities, including securing on-site services, responding to and documenting on-site accidents and emergencies, including facilitating in-house medical services, actively monitoring properties for incident prevention and response using measures such as CCTV, seeking assistance from emergency services, and issuing notifications and alerts during incidents or emergencies through channels like SMS, email, calls, and audio-visual prompts.	<p>Performance of contract, such as ensuring the safety of guests and personnel through interactions with on-site security personnel</p> <p>Legitimate interests, such as monitoring properties through CCTV to ensure the safety of guests and personnel</p> <p>Legal obligations, such as documenting onsite accidents</p> <p>Individuals' vital interests, such as contacting medical or emergency services for an ill guest</p>
Spa, Beauty, Golf, & Fitness Services	This purpose involves various activities, including managing reservations and bookings, assessing eligibility for services, accommodating disability or health-related restrictions, offering suitable and safe activities, services, and treatments, delivering consistent and personalized service according to the individual's past usage and preferences, handling payment processing, organizing specialized professionals for requested treatments and services, and addressing customer requests, inquiries, and complaints.	<p>Performance of contract, such as processing payments</p> <p>Consent, such as collecting information about back problems when providing massage services</p> <p>Legitimate interests, such as providing personalized services (e.g., offering golfing opportunities based on past activity)</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>

		Individuals' vital interests
Child-Related Services (for Parents & Legal Guardians)	This purpose involves various activities, including managing kids' club facilitating reservations and bookings, coordinating hotel accommodations and services based on guest preferences, instructions, and expectations, providing payment and billing services, and offering dining services such as special menus for children or discounts on breakfast for children under a specific age.	<p>Performance of contract, such as having a child of a certain age stay in the room with his/her parents may amount to extra charges or discounts</p> <p>Consent of parent or legal guardian, such as accommodating needs of children</p> <p>Legitimate interests, such as providing a crib or child-sized bathrobes and other amenities for children</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals' vital interests, such as when a child becomes ill while participating in kids' club</p>
On-Site Reception & Stay Services	There are a number of activities associated with this purpose, such as: facilitating check-in and check-out; processing payments; providing consistent and personalized service and advice about the on-site services (based on past usage or expressed preferences); providing concierge, luggage storage and parking services; making arrangements with third-party providers on behalf of guests (such as coordinating tours and other sightseeing excursions; arranging taxi, shuttle and chauffeur services; and facilitating	<p>Performance of contract, such as processing payments</p> <p>Legitimate interests, such as honoring the guest's preferences</p> <p>Consent, such as collecting information regarding dietary preferences that the guest chooses to provide</p> <p>Legal obligations, such as collecting national ID numbers where legally required</p>



	reservations and bookings at restaurants and events) etc	
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## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

### Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

### Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

### Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see: <https://www.serenahotels.com/>

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **Sharing your personal data**

We may share your personal data with the third parties for the purposes set out in this Privacy Policy. We may also share your personal data if the law requires it.

We may share personal data with the following third parties:

- Service providers e.g. booking & reservation systems and payment processing providers
- If you consent to receive notifications on our offers, we may share your data with our marketing services providers.
- Other hotels in our group
- Auditors and professional advisers like lawyers and accountants
- Government, regulators and law enforcement
- Other associated service providers for purposes of managing your stay with us including but not limited to; airlines, transport operators and loyalty program system providers.

We may also share aggregated demographic and statistical information in the course of our business with certain third parties. This sharing does not include any personal data that can identify any individual person.

By making a reservation, visiting, staying with us or using any of our services, you understand that we may transfer your Personal Data to our trusted Partners globally.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

### **International transfers**

We share your personal data within the hotels in our group. This will involve transferring your data outside Kenya. Whenever we transfer your personal data out of Kenya, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, we may use specific contracts which give personal data the same protection it has in Kenya.
- We will only transfer your personal data outside Kenya, where it is established that other appropriate safeguards have been put in place.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of Kenya.

### **How we protect the security of your personal data**

We want to keep your personal data safe and we have put in place appropriate security measures to ensure its confidentiality, integrity and availability. We also make sure that only authorised people are able to access your data, including employees, agents and other authorized third parties. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Unfortunately, data transmission over the Internet cannot be guaranteed to be totally secure. Although we will do our best to protect your personal data, we cannot completely guarantee the security of your data transmitted to our site.

### **How long we keep your personal data**

We will only keep your personal data for as long as we need to fulfil the purposes we collected it for, including for satisfying any legal, accounting, or reporting requirements.

In some circumstances we may remove your identity from your personal data (so that it can no longer be associated with you) for statistical purposes, in which case we may use this information indefinitely without further notice to you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

## **Your Legal Rights**

You have rights to your personal data, of which includes:

- Request access to your personal data
- Request correction of your personal data
- Request to delete your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data
- Right to withdraw consent

You have a right of access to your data by sending a written request to the address at the bottom of this policy.

## **Links to third party sites**

Our site may offer links to other websites. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **Changes to our Privacy Policy**

We reserve the right to change, modify or amend this policy at any time. However, if there are changes made to the policy what is here is the latest one.

## **Questions and Problems**

If you have any further queries relating to our Privacy Policy, or you have a problem or complaint, please contact us using the address below.

**Contacts:**

- Serena Hotels Africa: [dpo.tpsm@serenahotels.com](mailto:dpo.tpsm@serenahotels.com)
- Serena Hotels Asia: [vmarketing@serena.com.pk](mailto:vmarketing@serena.com.pk)