



PRIVACY POLICY

SR COTTAGE



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Maheshwar



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INTRODUCTION

SR Cottage – Global Privacy Policy

At SR COTTAGE, its affiliates and subsidiaries (hereinafter collectively referred to as “SR COTTAGE”, “we” or “us” or “our”), we endeavour to provide our guests outstanding services and experiences in our cottages and luxury residences around the world. We value your business and your faith in us in delivering you a superior level of service.

We recognise that privacy is important to our guests, and hence our Global Privacy Policy explains our practices regarding personal information we collect when you visit or use our cottages, restaurants, bars, spas, etc. (“the Services”) and our website, mobile applications, or other online products and services or when you fill up a form and become member of our loyalty programmes (“the Site”). We shall protect your personal data, to keep it secure as per applicable privacy and data protection laws.

You will be asked to consent to the terms of this Privacy Policy when making or confirming a reservation, joining our loyalty programmes, registering for events or promotions or otherwise corresponding with us via the Site or otherwise where required under applicable law.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact srcottage00@gmail.com in writing.

LAWFUL BASIS FOR PROCESSING

We may process your information because:

- We have a contract with you
- You would have given us express permission to do so
- We must have provided services to you after you have purchased something from us
- We must have provided services to you because you have taken one of our offers



- To comply with the law.

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 may include the following:

- personal and business information like your full name, date of birth, marital status, name of spouse, date of anniversary, address, contact information, etc.
- passport and visa information;
- identification document and/or address proof that you provide, viz. passport, driving licence, Aadhar card, etc.;
- guest stay information, including our cottages where you have stayed, date of arrival and departure, goods and services purchased, special requests made, your service preferences, telephone numbers dialled, email id, faxes, telephone and other messages received;
- your credit card, mobile payment and other payment details;
- your loyalty membership information, account details, profile or password details and any frequent flyer or travel partner programme affiliation;
- any information necessary to fulfil special requests (for example, leisure, travel and guest preferences, food allergies and/or medical information);
- medical / health information shared in order to avail any facilities at our cottages including but not limited to spa, swimming pool, adventure activities, gym, etc.;
- your reviews, feedback and opinions about our cottages, resorts, programmes and services;
- information collected through the use of closed-circuit television systems and other security systems;
- photographs; and
- any other personal data you choose to provide to us.

INFORMATION WE COLLECT AUTOMATICALLY WHEN YOU USE THE SITE:



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when you access or use the Services and 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 Services and Site and your experience, see which areas and features of our Services and 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;
- **Information We Collect From Other Sources:** we may also obtain personal data from our cottages and from our third party service providers, booking agents, travel agents and corporate accounts (such as information relating to the credit of guests) and combine that with information we collect through our Services and 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.

SITUATIONS IN WHICH WE WILL USE YOUR PERSONAL INFORMATION

We need all the categories of information in the list above primarily to allow us to perform our contract with you and to enable us to comply with legal obligations. In some cases, we may use your personal information to pursue legitimate interests of our own. Some of the purposes for which your personal data may be used are enumerated hereinbelow:

- Administering the contract, we have entered into with you;
- Business management and planning, including accounting and auditing;
- Business management and planning, including accounting and auditing;
- Making arrangements for the termination of a contract;



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- Providing privileges, special offers, benefits and services to you including but not limited to administering contests and processing membership of our loyalty programmes;
- Dealing with audits, legal disputes and insurance claims. Complying with health and safety obligations;
- To prevent fraud;
- To monitor your use of our information and communication systems to ensure compliance with our Global IT policy and laws of the land;
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
- To conduct data analytics studies to review and better understand customer satisfaction and needs;
- Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We may also use your personal information in the following situations:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes or requested for by investigative police or governmental authorities.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data:

- between and among SR COTTAGE and a limited number of our associates and 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 operator of the hotel or the hub of cottages which you book, stay or visit for the above purposes;
- with third-party service providers, payment processors, 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 Services and Site to you;
- with anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers and your employer) in order to fulfil contractual obligations;



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

SHOULD YOU WANT TO OPT OUT

If we possess your contact information, we may want to keep you posted about our products, services and events, through email. Should you prefer not to keep up to date with SR COTTAGE news and latest information on services and receive such marketing materials, please send an email to unsubscribe.

However, such withholding of information or withdrawal of consent may result in us not being able to provide services and facilities.

MINORS

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission.

If you are in the EU, our Site is 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.



CONTROL OF YOUR PERSONAL INFORMATION

We also provide you with the right to control your personal information, which includes the right to access, modify, erase, restrict, transmit, or object to certain uses of your information

You may request to review, correct, update, suppress, or otherwise modify any of your personal information that you have previously provided to us through www.srcottage.com, or object to the use or processing of such personal information by us. You have the ability to update your profile and related personal information at any time. To change this information, please login at www.srcottage.com and follow the prompts to "Update". Also, you may review, update, correct or delete your personal information collected through the website or service by e-mailing us at srcottage00@gmail.com.

If you have privacy concerns regarding access to or the correction of your Personal information, please contact us at the contact information mentioned within the section called "Data Privacy Issues and Whom to Contact" of this policy.

In your request, please make clear what personal information you would like to have changed, whether you would like to have your personal information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal information that you have provided to us.

While the majority of questions and issues related to access or requests can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within 30 days.

TRANSFERRING YOUR PERSONAL INFORMATION:

We do not sell your contact information to other marketers. As a global company, to ensure that you enjoy the same level of service across all our Cottages and luxury residences, owned or operated around the world, we may share your personal information with our cottages around the world. While doing so, we will ensure that your personal information is handled and safeguarded as per this policy.

OVERSEAS TRANSFERS OF YOUR PERSONAL DATA

Your personal data will be transferred to, and stored at, locations in India and in the location of the hotel in which you stay or visit. It may also be accessed and processed by our personnel and the personnel of our partners, affiliates and third-party service providers, who may operate in or outside India. We may transfer your personal information to servers located outside the country in which you live or to affiliates or other trusted third parties based in other countries so that they may process personal information on our behalf.



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When personal data is transferred from the EU to outside the EU, we shall do so as per applicable laws.

THIRD PARTIES:

- We use the services of third-party service providers to provide certain products and services like credit card billing, reservations services, call centre services, management of the loyalty programmes, mailing of promotional material, for which it is necessary to provide personal information. These parties are contractually prohibited from using the personal information for any purpose other than those specified by us. We may provide information that is non-personal, to certain service providers for their use on an aggregated basis for the purpose of performing their contractual obligations to us. We expressly prohibit the sale or transfer of any information to any party outside of SR COTTAGE by such service providers.

- From time to time we may partner with other companies to provide co-sponsored or co-branded promotions, products and services and may share your information with our co-sponsor. For example, we may co-sponsor some prize draws, competitions or contests on our site with other companies or we may provide prizes for contests sponsored by other companies. If you enter one of these contests, we may share your information with our co-sponsor or the third-party sponsor.

- In the event of a merger, consolidation, sale, liquidation or transfer of assets, we may, in our sole and absolute discretion, transfer, sell or assign information collected, including without limitation, non-personal information and personal information, to one or more affiliated or unaffiliated third parties.

- We may, with or without prior notice to you, have to share your information in order to comply with applicable laws or respond to governmental inquiries or requests from public authorities or to comply with valid legal process, to protect the rights, privacy, safety or property of SR COTTAGE, its guests, employees or the public or to permit us to pursue available remedies or limit the damages that we may sustain or to respond to an emergency.

- If you use a corporate credit card, your billing information may be shared with your employer.

USE OF COOKIES

We use various technologies to collect and store information when you visit our websites, and this may include using cookies or similar technologies to identify your browser or device. Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, time spent on the Online services, pages visited, referring URL, language preferences, and other aggregated traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, to collect statistical information, to personalize your experience while using the Online services and to recognize your computer in order to assist your use of the Online services, such as for the online reservation process. Cookies further allow us to select



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which of our advertisements or offers are most likely to appeal to you and display them while you are on the Online services or to send you advertisements and marketing emails. We may also use cookies or other technologies to track responses to our online advertisements and marketing emails. You can configure your browser to refuse cookies, or to warn you before a cookie is placed. If you disable cookies, some parts of our websites may not function properly or at all.

OTHER NON-PERSONAL OR ANONYMOUS INFORMATION COLLECTED BY US

Information that does not personally identify you is referred to as non-personal or anonymous information. When you visit and interact with the sites www.srcottage.com or our other websites or third parties with whom we have contracted to provide services, non-personal information, like a list of website pages visited by you, could be collected.

We may collect data by using web beacons, clear GIFS, pixel tags or similar means, which will tell us when you visit our site. Non-personal information like the domain name, the areas of the site you visit, your operating system, your browser version, and the URL you visited from, can be identified, which can be used to enhance your online experience by understanding your web usage patterns.

We may use or disclose non-personal information for any purpose from time to time since this does not personally identify you. For instance, we may embed e-mail addresses with images. In such cases where we combine non-personal information with personal information, the combined information will be treated by us as personal information as per this policy.

LINKS TO WEBSITES OF THIRD-PARTY MARKETERS

From time to time, we may allow third party advertisers advertise on our websites. These third-party advertisers may use technologies like cookies, pixel tags to track which ads your browser has seen and which site pages you may have visited. We have no control over the use of this technology or the resulting information and are not responsible for any actions or policies of such third parties.

If at some point in the future our websites contain links to third parties' websites, do please note, that we will not be responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. For information provided by you on third party sites, the privacy policy and terms of service on those sites will be applicable and we strongly advise you to read the privacy policies of websites that you visit before submitting personal information.

PROTECTION OF YOUR PERSONAL INFORMATION

We take, and require any third party to take, reasonable precautions, including administrative, technical and physical measures to safeguard your personal information against loss, theft, misuse, as well as unauthorized access, disclosure, alteration or destruction. Access to your



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personal information is restricted to prevent unauthorised access, modification or misuse and such access is only granted to our employees and agents on a need-to-know basis. However, unfortunately no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure. You can help us by also taking precautions to protect your personal data when you are on the internet. For your own privacy protection, we advise you not to include sensitive personal information in any emails you may send to us. Please do not send credit card numbers or any sensitive personal information to us via email.

We cannot guarantee that our Services and 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.

RETENTION AND DISPOSAL OF YOUR PERSONAL INFORMATION

Your personal data will be retained in a form which enables us to identify you for no longer than it is necessary for the purposes for which the data was collected and used. Your personal data may be retained in certain files for a period of time as required by applicable law and following our data retention policies in order to comply with such financial or legal requirements, to properly resolve disputes or to troubleshoot problems.

POLICY MODIFICATIONS

We may update our privacy policy from time to time, without prior notice, and post it on the Site so that you are always informed of the way we collect and use your personal data. We encourage you to review this Privacy Policy whenever you access the Services and Site or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy on the Site

DATA PRIVACY ISSUES AND WHOM TO CONTACT

If you have any questions, comments or concerns about this Global Privacy Policy or about how we handle your personal information, please get in touch with our Data Protection Officer (DPO) at srcottage00@gmail.com . Alternatively, you may also contact us by clicking the Contact Us link on the website and following the appropriate links thereon.

You have the right to tell us if you:

- do not wish to be contacted by us henceforth
- would like to withdraw consent to personal data processing



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- wish to obtain a copy of your personal information that we hold
- would like us to correct, update or delete your personal information in our records
- wish to report any misuse of your personal information

To assist us in handling your request, please provide your full name and details.