

Rose Villa Saigon Privacy Policy

Last updated June 2020

Introduction

This policy (**Policy**) relates to your personal information in connection with your use of and access to the Rose Villa Saigon website at [www.rosevillasaigon.com] (**Rose Villa Saigon Website**) and services that Rose Villa Saigon provides (collectively **Rose Villa Saigon Services**).

We are committed to protecting your Information (as defined below) and your right to privacy. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where information about your identity has been removed (anonymous data). If you have any questions or concerns about this Policy, or our practices with regards to your personal information, please contact us at welcome@rosevillasaigon.com.

When you use the Rose Villa Saigon Services, you trust us with your Information. We take your privacy very seriously. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this Policy that you do not agree with, please discontinue use of the Rose Villa Saigon Services.

Changes to this Policy or your personal information

We review this Policy regularly and it is your responsibility to check regularly and determine whether this Policy has changed. If you do not agree to any change to this Policy then you must immediately stop using the Rose Villa Saigon Services. In the event we make any significant changes to this Policy we will use our best endeavours to inform you of such changes in advance in writing.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes for example you change your email address or phone number.

About us

The Rose Villa Saigon Services are owned and operated by Thao Dien Village Co. Limited (trading as “**Rose Villa Saigon**”) a company registered in Vietnam and whose registered office is 197, 197/1 Nguyen Van Huong St., Thao Dien Ward, Dist. 2, Ho Chi Minh City, Vietnam (**Rose Villa Saigon/we/us/our**). Rose Villa Saigon is the controller (also known as a data controller) and is responsible for your personal information. The term “**you**” refers to the user wishing to access and/or use the Rose Villa Saigon Services.

Information we may collect about you

Personal information you disclose to us

In Short: We collect personal information that you provide to us including information such as name, address, contact information, information on any bookings you make through Rose Villa Saigon.

We collect personal information that you voluntarily provide to us when registering as a member or to stay at Rose Villa Saigon and/or to use the Rose Villa Saigon Services, or otherwise contacting us. The personal information that we collect depends on the context of your interactions, the choices you make and the products and features you use. When you use the

Rose Villa Saigon Services and/or when you otherwise deal with us, we may collect the following information about you (the **Information**):

- Identity and Personal Data includes first name, last name, date of birth, and gender.
- Contact Data means the data we use to contact you including your billing address, delivery address, work address, email address and contact numbers.
- Transaction Data means details about any transactions you have made in connection with the Rose Villa Saigon Services including details of any bookings you have made through Rose Villa Saigon such as travel and restaurant bookings.
- Profile Data includes your username, email address, your login data, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use the Rose Villa Saigon Website. This includes your browsing patterns and information such as how long you might spend on one of our webpages on the Rose Villa Website and the bookings you make through Rose Villa Saigon and the click stream during your visit to the Rose Villa Saigon Website, page response times and page interaction information (clicks you make on a page).
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Other information relevant to you such as events and/or offers.

If you choose to access the Rose Villa Saigon Website from a shared computer or open wifi connection with your login information, we strongly recommend logging off when you have finished and removing cookies and the history of the websites visited once you've finished.

Information automatically collected

In Short: Some information – such as IP address and/or browser and device characteristics – is collected automatically when you use the Rose Villa Saigon Website.

We automatically collect certain information when you visit, use or navigate the Rose Villa Saigon Website. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use the Rose Villa Saigon Website and other technical information. This information is primarily needed to maintain the security and operation of the Rose Villa Saigon Website, and for our internal analytics and reporting purposes. Most devices allow you to manage the use of location services through your settings menu. If you would prefer not to share your location, please disable use through your device directly.

Like many businesses, we also collect information through cookies and similar technologies. You can find out more about this in our Cookies Policy.

How do we use your Information?

In Short: We process your Information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use your Information collected via the Rose Villa Saigon Services for a variety of business purposes described below. We process your Information for these purposes in reliance on our legitimate business interests (**Business Purposes**), in order to enter into or perform a contract with you (**Contractual**), with your consent (**Consent**), and/or for compliance with our legal

obligations (**Legal Obligations**). We indicate the specific processing grounds we rely on next to each purpose listed below.

We may process your Information for the following purposes:

- Fulfil and manage any orders in connection with the Rose Villa Saigon Services and administer and manager your account (Contractual). We may use your Information or pass it onto third party partners in order to enable the services you have requested through the Rose Villa Saigon Services such as your membership to Rose Villa Saigon and any bookings that Rose Villa Saigon have made on your behalf.
- To send administrative information to you for Business Purposes, Legal Obligations and/or possibly Contractual. We may use your Information to send you event, service and new feature information and/or information about changes to our Terms and policies.
- To send you marketing and promotional communications for Business Purposes and/or with your Consent. We and/or our third party partners may use your Information for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails, see below for further details.
- Administer promotions for our Business Purposes and/or with your Consent.
- Request Feedback for our Business Purposes and/or with your Consent. We may use your Information to request feedback and to contact you about your use of the Rose Villa Saigon Services.
- To protect Rose Villa Saigon for Business Purposes and/or Legal Obligations. We may use your Information as part of our efforts to keep the Rose Villa Saigon Services safe and secure (for example, for fraud monitoring and prevention).
- To enforce our Terms and policies for Business Purposes, Legal Obligations and/or possibly Contractual.
- To respond to legal requests and prevent harm for Legal Obligations. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
- For other Business Purposes. We may use your Information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve the Rose Villa Saigon Services and your experience.

Will your Information be shared with anyone?

In Short: We only share information to comply with Contractual obligations, fulfil our Business Purposes, or with your Consent.

We only share and disclose your Information in the following situations:

- Contractual: to fulfil any contractual obligations we have to you, for example connected to your Rose Villa Saigon or any bookings we have made on your behalf.
- Compliance with Legal Obligations. We may disclose your Information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Vital Interests. We may disclose your Information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

- **Third-Party Service Providers.** We may share your Information with third-party vendors, service providers, contractors or agents who perform services and require access to such information to do that work. Examples include: payment card providers, hotels, restaurants, travel companies, data analysis, email delivery, credit reference agencies and marketing agencies. They will only have access to your Information to the extent that they need to perform those services. They are required to keep your Information confidential and may not use it other than as we ask them to and always in accordance with this Policy. In some cases, the Information provided to us varies and is controlled by the specific service or as authorised by you via your privacy settings for that service. For more information on how these companies handle your personal data, please refer to their privacy policies.
- **Business Transfers.** We may share or transfer your Information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Third-Party Advertisers.** We may use third-party advertising companies to serve ads when you visit the Rose Villa Saigon Website. These companies may use information about your visits to the Rose Villa Saigon Website and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you. See our Cookie Policy for further information
- **Business Partners.** Provided you have given us Consent to do so we may share your Information with our business partners to offer you certain products, services or promotions.
- **With your Consent.** We may disclose your Information for any other purpose with your Consent.

We may disclose aggregated, anonymous information (i.e. information from which you cannot be personally identified), or insights based on such anonymous information, to selected third parties, including (without limitation) analytics and search engine providers to assist us in the improvement and optimisation of the Rose Villa Saigon Services. In such circumstances we do not disclose any information which can identify you personally.

Information collected from other Sources

In Short: We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

We may obtain Information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, due date, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links). The information provided to us varies and is controlled by the specific service or as authorised by you via your privacy settings for that service.

Is your Information transferred internationally?

In Short: We may transfer, store, and process your Information in countries other than your own but will take all reasonable steps to ensure it is protected.

Whenever we transfer your Information outside of Vietnam, we will take all reasonable measures that we can to protect your Information in accordance with this Policy and applicable law. To the extent that any transfer requires approved safeguards are in place (for example if transferring information from inside the European Economic Area (**EEA**) to outside of it that the EU model

contract clauses will be in place or if transferring from the EEA to the USA that the entity it is transferred to is EU/US Privacy Shield registered).

Third-party websites

In Short: We are not responsible for the safety of any information that you share with third-party providers who feature or advertise, but are not affiliated with, Rose Villa Saigon.

The Rose Villa Saigon Website features links to third-party websites or contain advertisements from third parties that are not affiliated with us and which may link to other websites, online services or mobile applications. We cannot guarantee the safety and privacy of data you provide to any third parties. Any data collected by third parties is not covered by this Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites, services or applications that may be linked to or from the Rose Villa Saigon Website. You should review the policies of such third parties and contact them directly to respond to your questions.

How long do we keep your Information?

In Short: We keep your Information for as long as necessary to fulfil the purposes outlined in this Policy unless otherwise required by law.

We will only keep your Information for as long as it is necessary for the purposes set out in this Policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements).

When we have no ongoing Business Purpose to process your Information, we will either delete or anonymise it, or, if this is not possible (for example, because your Information has been stored in backup archives), then we will securely store your Information and isolate it from any further processing until deletion is possible.

How do we keep your Information safe?

In Short: We aim to protect your Information through a system of organisational and technical security measures.

We have implemented appropriate technical and organisational security measures designed to protect the security of any Information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your Information, transmission of Information to and from the Rose Villa Saigon Website is at your own risk. You should only access our services within a secure environment.

Do we collect information from minors?

In Short: We take steps to ensure that the Rose Villa Saigon Services are only used by those over 18 years of age and we do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Rose Villa Saigon Services, you represent that you are at least 18 years of age. If we learn that Information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [insert email].

Your Consent to processing

You will be required to give Consent to certain processing activities before we can process your Information. Where applicable, we will seek Consent from you when you first submit Information to or through the Rose Villa Saigon Services.

If you have previously given your Consent you may freely withdraw such Consent at any time. You can do this by emailing welcome@rosevillasaiagon.com.

If you withdraw your Consent, and if we do not have another legal basis for processing your Information, then we will stop processing your Information. If we do have another legal basis for processing your Information, then we may continue to do so subject to your legal rights.

Please note that if we need to process your Information in order for you to use the Rose Villa Saigon Services and you object or do not provide Consent to us processing your Information, the Rose Villa Saigon Services will not be available to you.

Marketing and opting out

If you have given Consent to marketing we may contact you about our products, services, promotions and special offers. If you no longer wish to receive such information you can withdraw your Consent at any time by sending an email to [insert email] or unsubscribing from the communications.

If you have given Consent, we may share your Information with carefully selected third-party organisations and business partners and they may contact you directly. If you prefer not to receive direct marketing communications from the third-party please contact them directly to withdraw the Consent.

Account Information

Need to make changes to your info?

If you need to make changes on the information that Rose Villa Saigon holds on you please contact us on welcome@rosevillasaiagon.com

What are your privacy rights?

In Short: You have certain rights in respect of your Information.

You may have certain rights under applicable data protection laws depending on whether you have supplied your information from. These may include the right (i) to request access and obtain a copy of your Information, (ii) to request rectification or erasure of your Information; (iii) to restrict the processing of your Information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your Information. To make any requests, please contact us at welcome@rosevillasaiagon.com. We will consider and act upon any request in accordance with Vietnam applicable data protection laws.

We may need to request specific information from you to help confirm your identity and ensure your right to access your Information (or to exercise any of your other rights). This is a security measure to ensure that your Information is not disclosed to a person who does not have the right to receive it. We may also contact you to ask you for further information in relation to your request to speed up your response.

If we are relying on Consent to process your Information, you have the right to withdraw your Consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

Contact us

We welcome your feedback and questions on this Policy. If you wish to contact us about this Policy, about our Information or any other questions, please email us at welcome@rosevillasaiagon.com.