



## PRIVACY POLICY

Last update on 13 December, 2023

This Privacy Policy applies to personal data that we collect from you as a user of this website, partner or customer (“you” or “your” being interpreted accordingly). It provides information on what personal data we collect, why we collect the personal data, how it is used and the lawful basis on which your personal data is processed, and what your rights are under the applicable data protection and privacy laws.

‘Personal data’ as used in this Privacy Policy means any information that relates to you from which you can be identified.

By using our website our booking engine, or submitting your personal data you are taken to accept the terms of this Privacy Policy, so please read it carefully.

### DATA COLLECTION

We collect the following personal data about you:

- **Reservation Information:** Guest information, such as your first and last name, email address, billing and payment information. Personal data collected in relation to reservations will be processed in accordance with a privacy policy provided at the time of requesting a reservation by the property.
- **Other Information:** Personal details you choose to give when corresponding with us by phone, e-mail or social media, participating in user/customer/member surveys or otherwise visiting and interacting with this website and personal data that you provide to us when you visit one of our premises. We can also combine personal data that you provide to us with other information we collect about you when you make a reservation through third-party services such as online restaurant-reservation or travel fare aggregator websites, as necessary to process your requests.

### HOW WE USE YOUR PERSONAL DATA

We use your personal data in the following ways:

- To complete and fulfil your reservation and stay, for example, to process your payment, ensure that your room is available, and provide you with related customer service, including sending confirmations or pre-arrival messages, assist you with meetings, events or celebrations. Such use is necessary for the performance of the contract between you and us.
- To contact you in connection with user/customer/member surveys and use any information you choose to submit in response, provided that you gave us your consent to being contacted in this way at the time you provided us with the personal data.
- Jiva Hoa Lu Retreat and our different entities may provide you, or permit selected third party service providers to provide you, with information about goods or services, events and other promotions we feel may interest you through our monthly newsletter. We (or such third party providers) will contact you by email only with your consent, which was given at the time you provided us with the personal data.
- As necessary for certain legitimate business interests, which include the following:
  - Where we are asked to deal with any enquiries or complaints you make
  - To administer our Site, to better understand how visitors interact with our websites and ensure that our Site is presented in the most effective manner for you and for your computer/device.
  - To conduct analytics to inform our marketing strategy and enable us to enhance and personalise the experience we offer to our members and our communications, including by creating customer or member profiles to enable personalised direct marketing communications.
  - To provide postal communications which we think will be of interest to you.
  - If you ask us to delete your data or to be removed from our marketing lists and we are required to fulfil your request, to keep basic data to identify you and prevent further unwanted processing.
  - To share personal data among our affiliated businesses for administrative purposes, for providing membership services and in relation to our sales and marketing activities.
  - We may anonymise, aggregate and de-identify the data that we collect and use such anonymised, aggregated and de-identified data for our own internal business purposes, including sharing it with our current and prospective members, business partners, our affiliated businesses, agents and other third parties for commercial, statistical and market research purposes, for example to allow those parties to analyse patterns among groups of people, and conducting research on demographics, interests and behavior.
  - For internal business/technical operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes and as part of our efforts to keep our Site, network and information systems secure.
  - To (a) comply with legal obligations, (b) respond to requests from competent authorities; (c) enforce our House Rules; (d) protect our operations or those of any of our affiliated businesses; (e) protect our rights, safety or property, and/or that of our affiliated businesses, you or others; and (f) enforcing or defending legal rights, or preventing damage.
- We may use your personal data for other purposes which you have consented to at the time of providing your data.

### PERSONAL DATA RETENTION

- We will keep your personal data only for as long as is reasonably necessary for the purposes outlined in this Privacy Policy, or for the duration required by any legal, regulatory, accounting or reporting requirements, whichever is the longer. When you consent to receive marketing communications, we will keep your data until you unsubscribe.
- To determine the appropriate retention period for your personal data, we consider the amount, nature, and sensitivity of the personal data, the purposes for which we process your personal data, applicable legal requirements or operational retention needs, and whether we can achieve those purposes through other means.
- Upon expiry of the applicable retention period we will securely destroy your personal data in accordance with applicable laws and regulations. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

### YOUR PERSONAL DATA PROTECTION RIGHTS

As per data protection laws, you have the following rights in relation to your personal data:

- **Right of access:** If you ask us, we will confirm whether we are processing your personal data and, if so, provide you with a copy of that personal data along with certain other details such as the purpose of the data processing. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your personal data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your personal data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.
- **Right to erasure:** You may ask us to delete or remove your personal data, such as where our legal basis for the processing is your consent and you withdraw consent. If we shared your data with others, we will tell them about the erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data with so you can contact them directly. We may continue processing personal data where this is necessary for a legitimate interest in doing so, as described in this Privacy Policy.
- **Right to restrict processing:** You may ask us to restrict or ‘block’ the processing of your personal data in certain circumstances, such as where you contest the accuracy of the personal data or object to us processing it. We will tell you before we lift any restriction on processing. If we shared your personal data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your personal data so you can contact them directly.
- **Right to data portability:** You have the right to obtain your personal data from us that you consented to give us or that was provided to us as necessary in connection with our contract with you. We will provide you with your personal data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- **Right to object:** You may ask us at any time to stop processing your personal data, and we will do so:
  - If we are relying on a legitimate interest to process your personal data — unless we demonstrate compelling legitimate grounds for the processing or
  - If we are processing your personal data for direct marketing.
- **Right to withdraw consent:** If we rely on your consent to process your personal data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing of your data before we received notice that you wished to withdraw your consent.’

If you wish to exercise any of these rights, including to access, rectify or delete personal information at any point in time, please contact us by email at [Jiva@JivaHoaLuRetreat.com](mailto:Jiva@JivaHoaLuRetreat.com) or by submitting a written notice to:

Protection of personal data / Jiva Hoa Lu Retreat / Thai Vi Temple Valley, Ninh Hai Commune, Hoa Lu 08213, Ninh Binh, Viet Nam.

We may need to ask you for further information to verify your identity before we can respond to any request.

### CONTACT

If you have any questions, comments or complaints regarding these Terms & Conditions, this Website or your Privacy Policy, you can contact us at [Jiva@JivaHoaLuRetreat.com](mailto:Jiva@JivaHoaLuRetreat.com).



