

THE FREDENSBORG COLLECTION

PRIVACY POLICY

Last updated on 22 November 2018

GUIDE TO THIS PRIVACY POLICY

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1. INTRODUCTION

- 1.1. Welcome to the Privacy Policy applicable to the Fredensborg Collection of properties. Each property forming part of the collection is owned by a separate company, details of which are set out in clause 12 below ("**Privacy Policy**").
- 1.2. This Privacy Policy sets out the details of how we collect, use, store, record, disclose and destroy information ("**Process**") relating to our guests, as well as visitors to our online platform (the "**Platform**"), and it sets out your rights pertaining to your control over such information.
- 1.3. Please note that by using the Platform, you consent to us Processing your information in accordance with this Privacy Policy.
- 1.4. For the purposes of compliance with European data laws, we are a data controller, as we determine how and why your information is Processed.
- 1.5. The protection and confidentiality of your information is extremely important to us. Should you have any queries, comments or concerns about the way that we Process information, please feel free to reach out to us by emailing hotell@tollboden.com.

2. WHAT INFORMATION DO WE COLLECT?

- 2.1. All tenants renting accommodation from us will be required to provide us with basic identifying information such as full name, nationality, passport number, physical address, telephone number and email address. We require this information in order to perform our contractual obligations to lease the relevant property, and provide related services, to you.
- 2.2. As a tenant, or occupant, of one of our properties, you will receive bespoke personal service from us, and, accordingly, we will request, and keep a record of, any personal preferences, or requirements, you might have. This is so that we can fulfil our personal service obligations to you.
- 2.3. When you access the Platform, we may passively collect and store your data. This data may include details relating to, for instance, your IP address, your operating system or your browser details. You have control over what information is passively collected by making use of your browser settings. It is important to note that changes to these settings may affect the way in which our Platform operates. More information in this regard is set out in clause 3.
- 2.4. Any other information collected by us will only be Processed:
 - 2.4.1. with your consent (which consent may be withdrawn at any time); or
 - 2.4.2. where it is necessary:

- 2.4.2.1. to perform any contractual obligations towards you;
- 2.4.2.2. to operate our business functions and platform; or
- 2.4.2.3. to comply with our legal obligations; or
- 2.4.2.4. to protect your vital interests.

3. **HOW LONG DO WE KEEP YOUR INFORMATION FOR?**

We store all data for a minimum of 5 years, or as may otherwise be required by law.

4. **COOKIES**

- 4.1. When you interact with our Platform, we may collect certain personally non-identifiable information, including Internet Protocol (IP) addresses, domain names, your approximate geographic location, and a record of the Platform pages visited, the time visited and aggregated information that cannot be used to specifically identify a user. Such information (which is collected passively) is strictly for statistical purposes and cannot, in and of itself, be used to identify a specific user.
- 4.2. "Cookies" are small data files that are stored on a website user's computer by the web browser while the user is browsing the internet, and which contain data relating to the user's online activity.
- 4.3. By using our Platform, you consent to our use of cookies in accordance with this policy. Cookies assist in providing additional functionality to the Platform and helps us analyse Platform usage more accurately. You may adjust your browser settings to decline or limit the use of cookies, however, as mentioned, this may limit your use of the Platform.

5. **OUR USE OF YOUR INFORMATION**

- 5.1. We may use your information to:
 - 5.1.1. improve your experience with us by, for example, using information relating to your preferences to personalise our services to meet your needs;
 - 5.1.2. manage bookings;
 - 5.1.3. review usage and/or operation of the Platform;
 - 5.1.4. respond to correspondence received from you;
 - 5.1.5. contact you for any other reason, but only if we have received your express permission.

6. DO WE EVER DISCLOSE YOUR INFORMATION TO ANYONE?

6.1. Amongst the Fredensborg Collection of Properties

We may share your personal information and preferences across and amongst the relevant property owning companies within the Fredensborg collection so that you may enjoy a seamless booking and service experience no matter which property you choose to visit.

6.2. Our Service Providers

6.2.1. We may share your information with certain employees, staff, contractors and service providers but strictly on a need to know basis.

6.2.2. These service providers will only be able to access the minimum amount of information necessary, and they may not share your information with third parties.

6.3. Legal Obligation

6.3.1. We may share your information in any manner necessary in order to comply with any law, regulation legal process or governmental request.

6.3.2. We may also access and/or disclose your information where it is necessary in an investigation relating to public safety, or where it is otherwise necessarily required by law.

6.4. For Vital Interests or Security Purposes

6.4.1. We may disclose your information:

6.4.1.1. as necessary where there has been a violation of the rights of any third party, or of any legal document or contract related to our services or the Platform; and

6.4.1.2. in order to protect the vital interests of a person such as in a medical emergency.

7. OUR PROCESSING PRINCIPLES

7.1. The protection of your information is extremely important to us, and we accordingly maintain appropriate procedures in order to keep your information safe and secure.

7.2. In order to ensure that your personal information is Processed with an appropriate level of privacy, we have adopted the following principles with regard to the Processing of your information:

- 7.2.1. we only Process data in a lawful, fair and transparent manner;
- 7.2.2. we only collect personal data for specified and legitimate purposes;
- 7.2.3. the personal data that we collect is limited to what is relevant and necessary for the purpose for which it is Processed;
- 7.2.4. to the extent that we can, we will ensure that we keep your personal data accurate, up to date and complete, and furthermore ensure that all inaccurate and incomplete information is rectified or deleted;
- 7.2.5. we will only store your personal data for as long as is necessary for the purposes for which the data is collected; and
- 7.2.6. we will only Process personal data in a manner that ensures the appropriate security of your personal data.

8. **USER RIGHTS**

8.1. You have the following rights:

- 8.1.1. right of access, which includes the right to request a copy of the information that we hold about you (which request may be subject to a reasonable administrative fee);
- 8.1.2. right of rectification, which allows you to request that the data we hold about you be corrected;
- 8.1.3. right to be forgotten, which allows you to request that the data we hold about you be erased in circumstances where such erasure is permissible (which request may be subject to a reasonable administrative fee);
- 8.1.4. right to restrict the Processing of your data in certain circumstances;
- 8.1.5. right of portability, which includes the right to have the data that we hold about you transferred to a third party;
- 8.1.6. right to object to certain types of Processing, for instance, to direct marketing, and to object to automatic Processing or profiling of data;
- 8.1.7. right to judicial review, which includes the right to complain to any relevant authority regarding our use of your data; and
- 8.1.8. right to withdraw your consent to us Processing your data.

9. WHERE IS YOUR DATA PROCESSED?

Your data may be Processed in foreign jurisdictions from time to time. We will ensure that our host providers are subject to laws and/or policies that uphold principles for the reasonable processing of information substantially similar to the data protection laws of South Africa and the European Union in order to ensure the greatest level of protection of your data.

10. CHILDREN

We will only Process information of persons under 18 years of age with the express consent of their parent or guardian and this information will typically be limited to basic identifying information and relevant personal preferences or need-to-know dietary or medical requirements.

11. QUESTIONS OR CONCERNS?

11.1. Please feel free to reach out to us if you have any questions or comments about our Privacy Policy by emailing us at hotell@tollboden.com.

11.2. Our designated data controller will be charged with making decisions regarding the purposes and methods of the Processing of data in terms of this Privacy Policy.

11.3. You also have the right to address any complaints or concerns to an appropriate data protection authority.

12. COMPANY DETAILS

12.1. 008 Bond Villa

Name of Property Owner	Crescent House Proprietary Limited, a private company duly incorporated in the Republic of South Africa (as the duly authorised agent of the property owner)
Registration No.	2007/022306/07
Address	8 First Crescent, Camps Bay, Cape Town, South Africa
Contact Telephone Number	+27 79 014 7937
Contact Email Address	info@008.co.za

12.2. Domaine de Lansa

12.3. Tollboden

Name of Property Owner	Fredensborg AS
Registration No.	942881479
Address	PA Heuchsgate 4A, 3770 Kragerø
Contact Telephone Number	+4746432290
Contact Email Address	dagligleder@tollboden.com

12.4. B25 Resort