

7 Wonders Hotel Privacy Policy

INTRODUCTION

We want you to be familiar with how we collect, use and disclose information. This Privacy Policy describes the privacy practices of 7 Wonders Hotel ("7 Wonders", "we", "us and "our") in connection with the information that we collect:

- Through www.7wondershotel.com operated by us from which you are accessing this Privacy Policy.
- When you visit or stay as a guest at our property, or through other offline modes of communication.
- Through the email messages that we send to you that link to this Privacy Policy and through your communications with us.

We endeavour to provide our guests outstanding services and experiences in our hotel. We value your business and your faith in us in delivering you a superior level of service. We want our services to be safe and secure for our users. Uniform practices for collecting, using, disclosing, storing, retaining, disposing, accessing, transferring or otherwise processing such information assists 7 wonders to process Personal Information fairly and appropriately, disclosing it and/or transferring it only under appropriate circumstances. This privacy policy relates to our use of any personal information we collect from you for providing hospitality related services.

We recognize that privacy is important to our guests, and hence our Privacy Policy explains our practices regarding personal information we collect when you visit or use our hotel, restaurant & banquet ("the Services") and our website, mobile application, or other online products and services or, joining our loyalty programmes or, otherwise corresponding with us via Site ("the Site") or where required under applicable law. We shall protect your personal data, to keep it secure as per applicable privacy and data protection laws.

This privacy policy intends to update you on how we use your personal information collected through www.7wondershotel.com provided to us by other means. Please read this privacy policy before using www.7wondershotel.com submitting any personal information. The privacy policy also relates to our use of any personal information you provide to us by phone, SMS, email, in letters, in person, through representatives and other correspondence or means.

This policy will be updated subject to any changes in information collection, activities performed or any applicable regulations. You are encouraged to review the privacy policy whenever you visit www.7wondershotel.com to make sure that you understand how any personal information you provide will be used and retained.

PLEASE NOTE:

The privacy practices set forth in this privacy policy are for www.7wondershotel.com only. If you link to other web sites, please review their respective privacy policies, which may be very different.

SITE

The Site makes available information relating to hotel owned or managed by 7 Wonders, a company constituted under the laws of India.

PURPOSE

The purpose of this policy is to highlight various obligations, best practices and tools that support compliance with data privacy regulations applicable to 7 wonders in its role as both data controller as well as data processor, as applicable (if any).

APPLICABILITY

This privacy policy is applicable to:

- everyone who accesses and uses www.7wondershotel.com including but not limited to external legal entities in any form or manner.
- 7 Wonders customers who visit or stay at our properties.
- third party service providers or their representative.

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, 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 (if any).
- any information necessary to fulfill 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 hotel.
- your reviews, feedback and opinions about our hotel, 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.

If you submit any personal Information relating to other people to us or to our service providers in connection with the Services (e.g., if you make a reservation for another individual), you represent and warrant that you have the authority to do so and to permit us to use the information in accordance with 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 herein below:

- Administering the contract, we have entered into with you;
- Business management and planning, including accounting and auditing;

- Making arrangements for the termination of a contract;
- 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 IT policy and laws of the land;
- To ensure network and information security, including preventing unauthorized 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.
- Where we need to protect your interests (or someone else interest).
- Where it is needed in the public interest or for official purposes or requested for by investigative police or governmental authorities.

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

- To send promotion emails: The email address you provide will be used to send you information and updates related to the services provided by 7wonders.
- For marketing purposes (including 7 Wonders loyalty or similar programs), to inform you about other information, events, promotions, products or services we think will be of interest to you.

DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data:

- 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 organizers and your employer) in order to fulfill contractual obligations.
- 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 7 Wonders hotel, 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.
- To Obtain Third Party Services: We also share personal information and other information with third parties who provide services to 7 Wonders for website management, information technology and related infrastructure provision, marketing and campaign management, customer service, e-mail delivery, auditing, and other similar services. When 7 Wonders shares personal information with third party service providers, we contractually take an undertaking that they use your personal information and other information only for the purpose of providing services to us and subject to terms consistent with this policy as well as mutual non-disclosure agreements.

FAIRNESS AND PURPOSE

7 Wonders will collect adequate, relevant and necessary personal information, and will process such information fairly and lawfully for the purpose it is collected. The purpose of collection will be specified not later than at the time of data collection, or on each occasion of change of purpose.

ACCURACY OF INFORMATION

The information held by 7 Wonders Hotel or on www.7wondershotel.com or in our other systems collected by other means at the time of registration shall be checked and, from time to time, we may change the information requested upon registration or with respect to certain features or services.

MINORS

We may ask you to show kids id proof at the time of reservation check-in at our property. Just to fulfill the needs of legal entities. We do not knowingly collect personal information from individuals under 10 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission. Our Site is not directed at children under the age of 18. If you believe we have collected information through our site about a child under the age of 18, please contact us so that we may take appropriate steps to delete such information. If you are at least 10 but under the age of 18, please get the consent of your parent or legal guardian before giving us any personal data about yourself.

INFORMATION WE COLLECT AUTOMATICALLY WHEN YOU USE THE SITE:

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 devices 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 hotels 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 memberships), you confirm that you have their consent to provide their personal data to us. We recommend you show them this Privacy Policy.

USE OF COOKIES

We, and our partners, use various technologies to collect and store information when you visit www.7wondershotel.com, 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, e-mail address when you are logged-in to your e-mail from the browser you are using, 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 sending e-mailers to our website visitors whose online behaviors' indicate that they may be interested in travelling, 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 which of our advertisements or offers are most likely to appeal to you and display them while you are using 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 are placed. If you disable cookies, some parts of our websites may not function properly or at all.

TRANSFERRING YOUR PERSONAL INFORMATION

We do not sell your contact information to other marketers. As a company, to ensure that you enjoy the service at our Hotel, owned or operated by 7 Wonders, we may share your personal information with our other hotels. While doing so, we will ensure that your personal information is handled and safeguarded as per this policy.

COMMITMENT TO DATA SECURITY

We strive to keep your personal information secure and take reasonable effort to ensure that appropriate security and technical controls are implemented to ensure data security. Only selected and authorized employees, business partners, vendors and other third party providers may have access to this information.

7 Wonders ensures that our third party service providers employ industry standard security measures to ensure the security of information through legally binding terms and conditions. However, users of www.7wondershotel.com are responsible for maintaining the security of any password, user ID, or other form of authentication involved in obtaining access to password protected or secure areas of www.7wondershotel.com (if any). Access to and use of password protected and/or secure areas of www.7wondershotel.com is restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution.

CONSENT

Consent is often referred to as an individual's choice to "opt-in" or "opt-out" of 7 Wonders use of personal information and is usually obtained by a "check box" or signature confirming the individual understands and agrees to the processing of their personal information. At times, express written consent from the individual may be required based on the information processing activity. 7 Wonders receives consent from individuals prior to:

- collecting, using, or processing their personal information, including sensitive personal information, in certain ways or sharing the individual's personal information with any third party. Sensitive personal data is data revealing an individual's trade union membership, loyalty program membership, stay and booking patterns, biometric data, data concerning health or data concerning preferences during hotel stays;
- transferring the individual's personal information outside of the individual's country of residence
- using or placing web cookies on an individual's computer or other electronic devices.

CONTROL OF YOUR INFORMATION

7 Wonders also provides individuals with the right to control their personal information, which includes the right to review, modify, erase, restrict, transmit, or object to certain uses of their information.

You may request to review, correct, update, suppress or object to the use or processing of your Personal Information that you have previously provided to us while making a reservation enquiry through www.7wondershotel.com or during the stay at our hotels or by availing any of the other services provided by 7 Wonders. You may review, update, correct or delete your Personal Information collected through the website or service by e-mailing us at info@7wondershotel.com.

If you have privacy concerns regarding access to or the correction of your Personal Information, please contact us by emailing at info@7wondershotel.com privacy contact information mentioned within Section "Privacy Contact Information" 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. We may require you to provide some additional information in order to fulfill your request.

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 45 days.

Please note that we may need to retain certain information for record keeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or reservation, or participate in a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase, reservation, or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed. In addition, there may be certain information which we are unable to enable you to review, for legal, security, or other reasons.

7 Wonders reserves the right to decline access to your Personal Information under certain circumstances. If your Personal Information is not disclosed to you, you will be provided with the reasons for this non-disclosure.

THIRD PARTIES

- We use the services of third-party service providers to provide certain products and services like credit card billing, reservations 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 7 wonders 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 7 wonders, 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.

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 personal information is restricted to prevent unauthorized 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 7 Wonders to identify the individual for no longer than is necessary for the purposes for which the data was collected and used. Your personal data may be retained in certain files and systems for a period of time as required by applicable law and following 7 Wonders data retention policies in order to comply with such financial or legal requirements, to properly resolve disputes or to troubleshoot problems. If you wish to review or delete your information, contact us at info@7wondershotel.com. We will respond to your request to access or delete your information within 30 days.

In addition, some types of information may be stored for an infinite duration due to technical constraints, and will be blocked from further processing for purposes which are not mandatory by law or when consent is withdrawn. The information that you provide may be stored or transferred in our systems or on the systems provided by our third parties.

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.

WITHDRAWING CONSENT AND RESTRICTION OF PROCESSING

You may request to withdraw consent to personal data processing or you may review, update, correct or delete your personal information collected through the website or service by e-mailing us at info@7wondershotel.com. For users below the age of 18, consent should be provided by the holder of parental responsibility of the child.

PRIVACY CONTACT INFORMATION

If you have any questions, comments or concerns about this Privacy Policy or about how we handle your personal information, please get in touch with our Data Protection Officer at info@7wondershotel.com.

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
- 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.