



# Privacy Policy

**\*\* Please read these terms and conditions carefully as these conditions incorporate the basis on which bookings for us are accepted. \*\***

## General

We respect your personal and credit information (Personal Information), and this Privacy Policy (Policy) explains how we handle it.

This Policy applies to Personal Information collected, handled and used by us. It may change from time to time. Please visit our website regularly as we will let you know of any changes to this Policy by posting a notification on our website. We may also tell you more about how we handle your Personal Information over the course of our dealings with you.

This Policy applies to Personal Information collected, handled and used by Kemrose.

Kemrose which collects, handles and uses your Personal Information.

## What Personal Information about you do we collect

We collect Personal Information that is reasonably necessary to provide you with our services and for one or more of our functions or activities.

The types of Personal Information that we collect and hold may depend on your relationship with us and may include, but not be limited to:

- personal details, such as your name, gender, date of birth, nationality, passport and visa information, photo identification, personal and work contact details (addresses, emails and telephone numbers);
- payment and credit card information, such as bank accounts, name of cardholder, credit card number, credit card billing address and expiry date;
- guest stay information and lifestyle information, such as hotels where you have stayed, arrival and departure dates, room preferences, leisure activities, names and ages of children, observation of your
- services preference, and other information necessary to fulfil special requests;
- information, feedback or content you provide regarding your interests and preferences;
- loyalty program member information, online account details, profile or password details;



- information from our security systems such as from our closed circuit television system, card key, internet login and firewalls;
- information relating to your use and interaction with our website and mobile apps;
- employment history, references, resume, taxation details, qualifications.

## How we collect your Personal Information

Personal Information will generally be collected directly from you through the use of any of our application forms, booking systems, over the internet, through our website, our apps, through surveillance cameras, via email, other written means, in person, through a telephone conversation with you and by technology that is used to support communications between us.

There may, however, be some instances where Personal Information about you will be collected indirectly because it is unreasonable or impractical to collect Personal Information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

## How we process and use your Personal Information

We collect and use your Personal Information for one or more of the following reasons:

- providing our products and services to you;
- processing an application or booking you have made;
- acting as your agent if you request us to do so;
- undertaking various activities required by law or with your consent;
- liaising with and, providing assistance to, enforcement bodies in connection with enforcement related activities;
- providing you with information about other services that we, our related entities and other organisations that we have affiliations with offer, that may be of interest to you;
- providing you with promotional information about us, our related entities and other organisations that we have affiliations with;
- facilitating our internal business operations, including the fulfilment of any legal requirements;
- analysing our services and customer needs with a view to developing new and/or improved services;
- maintaining your safety and security as well as that of other guests and personnel

Insofar as reasonably necessary for us in delivering our products and services to you and for the purposes set out in this Policy, we may share your Personal Information with the below parties. The specific kind of information we share will depend on your activities with us and only to the extent as required or permitted by law, and/or with your consent.



- Kemrose;
- our business partners and third parties involved in the delivery of our products and services to you;
- our marketing and advertisement partners;
- service providers, who provide the various services that you have requested and we have arranged;
- a purchaser of the assets and operations of our business, providing those assets and operations are purchased as a going concern; and our related entities and other organisations that we have affiliations with for the purposes of providing you with information about services and various promotions that might be of interest to you.

## Security

We store your Personal Information in different ways, including in paper and in electronic form. The security of your Personal Information is important to us. We take all reasonable measures to ensure that your Personal Information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. We will review, monitor and update these security measures to meet our business needs, changes in technology and regulatory requirements.

To the extent permissible by applicable law, we generally only keep your information for as long as is reasonably required for:

- the purposes for which that Personal Information was provided;
- our ongoing business need, including record keeping, fraud prevention, or if we reasonably believe there is a prospect of litigation;
- as necessary to meet legal, regulatory, tax or accounting needs.

We also securely delete, dispose of, anonymise and/or block personal information when we no longer need it.

## Transfer of your Personal Information overseas

In order to run our business, we may need to share some of your Personal Information (including credit information) with organisations (for example, our related entities, third party suppliers and/or services providers, agents, advisors or consultants).

We may also need to share your Personal Information overseas if we sell, transfer or disclose our database of Personal Information to an actual or potential successor, purchaser or investor.

Before we disclose your Personal Information to an organisation, we are required to take reasonable steps to ensure that such an organisation does not breach the Privacy Act. Whilst we will take steps to ensure that the organisation does not breach the Privacy Act in respect of your Personal Information disclosed to it, it is not always possible to ensure that the



organisation will comply. We do not take any responsibility for the actions of such overseas third party recipients of your Personal Information.

**By agreeing to this Policy, you are agreeing that your Personal Information may be disclosed.** This means that you will not have recourse against us under the Privacy Act in the event that an overseas recipient of your Personal Information breaches the Privacy Act.

## Access and correction of your Personal Information

You may access the Personal Information we hold about you, upon making a written request. We will endeavour to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request.

We may decline a request for access to Personal Information where the Privacy Act requires us to do so.

If, upon receiving access to your Personal Information or at any other time, you believe the Personal Information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

You also have the right to ask us to not use your Personal Information for direct marketing purposes or communications by contacting our Privacy Officer in writing.

## Anonymity and Pseudonymity

You have the option to not identifying yourself, or using a pseudonym, when dealing with us in relation to a particular matter. This does not apply:

- where we are required or authorised by or under law, or a court/tribunal order, to deal with individuals who have identified themselves; or
- where it is impracticable for us to deal with you who have not identified themselves or who have used a pseudonym.

Failure to provide Personal Information to us If the Personal Information you provide to us is incomplete and/or inaccurate, we may be unable to respond to your request or provide the goods and/or services you seek.

## Links to other websites

Our website may contain links to other web sites. We are not responsible for the privacy practices of linked web

sites and so linked web sites are not subject to our privacy policies and procedures.



## Feedback and complaints

If you have any queries or concerns about the Policy or the way in which we handle your Personal Information,

please contact our Privacy Officer at:

Email address: [info@kemrose-uganda.cim](mailto:info@kemrose-uganda.cim)

Website: [www.kemrose-Uganda.com](http://www.kemrose-Uganda.com)