



## DATA PRIVACY POLICY

### Objective

The protection of personal data is important to us. Country Club Hospitality & Holidays Limited is committed to conducting its business in accordance with applicable data protection regulations, and in line with the highest standards of ethical conduct. This Privacy Policy ("Policy") sets forth the organizational intent and data protection principles which shall be followed by all Country Club Hospitality & Holidays Limited entities in its processing and protection of personal data.

Country Club Hospitality & Holidays Limited is fully committed to ensuring continued and effective implementation of this policy and expects all Country Club Hospitality & Holidays Limited employees and third parties to share in this commitment.

### Scope

The scope for the Data Loss Prevention policy and Privacy policy is applicable to the IT function and associated third parties for Country Club Hospitality & Holidays Limited

- For the provision or offer of goods or services to individuals (including those provided or offered free-of-charge) by Country Club Hospitality & Holidays Limited
- To actively monitor the behaviour of individuals. Monitoring the behaviour of individuals includes using data processing techniques such as persistent web browser cookies or dynamic IP address tracking to profile an individual with a view to taking a decision about them
- Analyzing or predicting their personal preferences, behaviour, and attitudes
- This Policy applies to all processing of personal data either in electronic form or where it is held in manual files that are structured in a way that allows ready access to information about individuals. Wherever the context requires in this Policy, personal data shall be interpreted to also include sensitive personal data
- This policy has been designed to establish a baseline standard for the processing and protection of personal data by all entities of Country Club Hospitality & Holidays Limited