



DATA PRIVACY POLICY

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Data Privacy Policy

Here at **Ngorongoro Safari Lodge Limited** your privacy is important to us. When handling and using your personal information, we are subject to the Personal Data Protection Act of 2022 ("Data Protection Act"). This policy sets out how we use and process your personal information when you use our website or other apps in course of seeking our services.

1. Introduction

At **Ngorongoro Safari Lodge Limited**, ("NSL", "Gibbs Farm" "we" or "us") are deeply committed to safeguarding the privacy of our clients, guests, visitors, employees, vendors, other third-party partners and individuals who interact with all our related services in compliance with the Personal Data Protection Laws. Accordingly, we have put in place this Privacy Policy, which outlines our data protection practices, including how we collect, process, store and protect your Personal Information, as well as your rights with respect to your personal data. This policy should be provided to you directly or be read on our website available at <https://www.gibbsfarm.com>

We reserve the right to modify this Privacy Policy periodically but we will inform you of such changes by posting the updated terms on our website. We suggest that you routinely check our website for this Privacy Policy updates.

We offer tourism services, such as accommodation and restaurant services (collectively, the "Services"). We provide our services through different channels such as: -

- Website <https://www.gibbsfarm.com> including any subdomains and any affiliated websites;
- Downloadable applications and software ("Software"), such as native applications which are distributed through mobile application stores, as well as PC and Mac desktop software which can be downloaded to your computer and
- Non-downloadable online applications (e.g. flash applications, HTML5 applications, etc.);
- Walk-in client base

This policy applies to all users of our online platforms, including our clients, guests, visitors, employees, vendors, other third-party partners, and individuals who interact with all our related services.

We encourage you to read this Privacy Policy carefully and use it to make informed decisions. By visiting Company's websites, mobile apps or other online properties, or by creating an account with us or using our services, you hereby knowingly and willingly agree to be bound by this Privacy Policy.

2. Privacy Principles

Ngorongoro Safari Lodge Limited follows the rules of the laws. This means that whenever we handle your personal data, we always follow the principles arising from the Personal Data Protection Laws and best practices. These include: -

- i. Lawfulness, fairness and transparency
- ii. Purpose limitation



- iii. Data minimization
- iv. Accuracy
- v. Storage limitation
- vi. Integrity and confidentiality
- vii. Accountability
- viii. Transparency
- ix. Adequacy
- x. Security

3. Why we collect personal information?

We need to process your personal information in order to provide you with our services. We will only collect the minimum amount of information that we need and we only ever use it for lawful purposes. We will process your Personal Information for a variety of reasons based on the following legal grounds: -

- ✓ **Fulfilment of a contract:** We shall process your Personal Information where it is necessary for the performance of a contract entered or to be entered by and between you and us.
- ✓ **Legitimate interests:** We may process your Personal Information where we deem such processing to be in our legitimate interests and provided always that such processing will not prejudice your interests, rights, and freedoms. You may object to the processing at any time. Examples of us processing in accordance with legitimate interests would include: -
 - Where we disclose your Personal Information to anyone or more of our affiliate/subsidiary companies for furtherance of our services to you, for internal administrative purposes,
 - Detection and retention of information pertaining to those with responsible safari operations,
 - Processing for the purposes of ensuring network and information security, including preventing unauthorized access to our electronic communications network,
 - Safeguarding the integrity of our services by combatting, reporting and sharing information related to suspicious or fraudulent activities,
 - Adhering to regulatory and statutory requirements
 - Devising a tailored reward scheme for customers and or
 - Sharing personal information with our advisers and professional services providers (such as auditors and lawyers) for ensuring our compliance with regulatory requirements and industry best practices.
- ✓ **Consent:** We may process your Personal Information on the basis of your consent given by you to us. In these instances, your Personal Information will be processed in accordance with such consent and you will be able to withdraw this consent in writing at any time.
- ✓ **Vital Interest:** We may process your Personal Information if it is necessary in order to protect your vital interests or the vital interests of another natural person, such as to prevent physical harm or threats that pose a risk of injury or other damage to the health of an individual.



- ✓ **Legal obligation:** We shall process your personal data in compliance with various legal and/or regulatory responsibilities, including, but not limited to, complying with the conditions of tour operator requirements, retention requirements and complying with any Tax, AML and KYC legislation.

4. What information do we collect?

4.1 Personal Information

The first type of information is information that identifies or may reasonably identify an individual with reasonable effort ("Personal Information"). Personal Information being gathered may consist of the following:

- **Registration details:** In course of procuring our services, you may be asked to provide us with certain details about yourself, such as: first and last name, email address, gender, birth data, physical address, ID number, phone number, occupation, etc. Some of the information we process about you is necessary for us to meet the legal and regulatory obligations that we have as a tour operator company. This includes processing bookings for accommodation, insurance requirements, health cautions/alerts and other government regulations.
- **Transactional information:** Information about the transaction, such as reservation details, purchase price, and date and location of the transaction.
- **Log Information.** Information related to your access to and use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, and the page you visited before navigating to our Services.
- **Device Information.** Information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, Media Access Control (MAC) address, screen resolution, language, and mobile network information. We use this information to ensure that our Services function properly.
- **Location Information.** The approximate location of your device from your IP address.
- **Special Categories of Personal Information.** Our processing of your personal information may also involve special categories of personal data such as gender, health data, financial data, child personal data and others.
- **Service information you provide to us.** We collect information you provide to us directly. That is to say when you request a reservation or a brochure, create an account, go on one of our trips, participate in any interactive features of the Services (like send a message through the Services), fill out a form, participate in a contest or promotion, make a purchase, apply for a job, communicate with us via third party social media sites, request customer support, or otherwise communicate or interact with us. The types of information we may collect include your name, email address, postal address, phone number, credit card and other payment information,



government identification information (like passport information when you make a reservation), health data and medical conditions (e.g., allergies, accessibility requirements and dietary restrictions/preferences) and any other information you choose to provide. We may collect information from you offline, such as when you speak on the phone with one of our adventure specialists or interact or transact with us in person at an event or during one of our trips. We may also collect professional and employment-related information about you if you apply for a job with us.

- **Voluntary information:** We also collect information that you provide us voluntarily. For example, when you respond to communications from us, communicate with us via email or share additional information about yourself through feedback form, newsletter subscription etc. This includes information you are willing to share with us for the purpose of improving and developing our relationship with you, as well as for maintaining your satisfaction from our Services.

We collect information about you by monitoring your access to our premises (e.g. CCTV). We also collect information about how you interact with our website, including IP addresses or other device information (you'll find more information about this in our Cookie Statement).

- **Telephone calls:** We may record or monitor telephone calls for the purposes of dispute resolution, exercise and establishment of legal claims, customer service (such as ensuring quality monitoring and assurance, operational efficiency, ensuring that quality standards are met in terms of support performance and satisfaction), compliance monitoring, training purposes, detecting and preventing crime or fraudulent activities.
- **Information we collect from third parties:** We may also obtain information about you from other sources. For example, we collect information about you from third parties, including from address and email address services as well as through participation in co-op marketing platforms (such as those hosted by **Not Applicable**). When you make a reservation for an expedition with one of our co-branded partners (such as World Wildlife Fund), we collect information about you that you provide to these partners.

4.2 Non-personal information

The second type of information is un-identified and non-identifiable information pertaining to users of our services, which may be made available or gathered in course of using our services. Non-Personal Information which is being collected consists of travel schedules, activities that customers want to undertake, days of stay in specific location for specific activity, etc. For avoidance of doubt, any Non-Personal Information connected or linked to any Personal Information shall be deemed as Personal Information as long as such connection or linkage exists.



5. Minors

For any Services to a minor, the guardian or parent have to consent to the processing of personal information of the child. A minor shall not be able to give consent on their own for any services. In any event person of legal age, parent or guardian is accompanied by a minor and would like for the said minor to be beneficiary of our services, we will request a consent of a parent or guardian for collection and processing minor's personal information. Once consent is issued, the information would be deemed to have been obtained lawfully and be used for the purpose it was obtained for.

We do not knowingly or intentionally gather information from children. If we have inadvertently collected the information of a child, a parent or guardian of that child may contact us to request that we delete the information from our records or otherwise cease the use of that information.

6. How do we use the collected information?

We use your Personal Information for the purposes listed below: -

- To set up, manage and update your account;
- To provide and operate the services to you;
- To communicate with you and to keep you informed of our latest updates to our services and special offers;
- To market our Services (see more below under "Marketing")
- To conduct analytics, statistical and research purposes, in order to improve and customize the Services to your needs and interests (such as by compiling aggregated reports about the usage of certain features of our Services)
- For customer relationship management purposes, and to support and troubleshoot the Services and to respond to your queries, including your requests to exercise your User Rights;
- To enable us to further develop, customize and improve the Services based on customer's common preferences and uses;
- Monitoring of activities, training and development
- To detect and prevent fraudulent and illegal activity or any other type of activity that may jeopardize or negatively affect the integrity of our services, including by identifying risks associated with your activity on our services;
- To assist us with meeting our regulatory obligations or as required by law or regulation (such as tour operation regulations, KYC and AML regulatory requirements).
- To pursue our legitimate interest in managing the safety and security of our premises and services for the prevention, detection and prosecution of crime, security health and safety (e.g., CCTV Video images);

7. Marketing

As our customer, we will keep you informed generally about our services, send you newsletters (if you subscribe to our mailing list), invite you to participate in a survey or let you know about offers, promotions, or prizes. We tailor these messages based on the sorts of services you obtained from us. The Company may use your Personal Information for various marketing purposes, including direct email, post, SMS, and telephone marketing. This may be done by us or through our third-party sub-processors. The goal is to provide you with promotional



materials related to our Services, as well as products, services, websites, and applications connected to the Company and its business partners and affiliates (collectively referred to as “Marketing Affiliates”).

You may at any time decline receiving further marketing offers from us or from our Marketing Affiliates by contacting us at the provided email address or by unsubscribing from receiving marketing materials by following the guidelines available on the marketing communications (such as clicking on an “unsubscribe” button).

8. With whom we share information?

We may share your Personal Information with third parties (“Recipients”) as described in this Privacy Policy. The Personal Information will be disclosed to Recipients only to the extent required for the specific purpose, as stipulated in this Privacy Policy. We may share Personal Information with any of the following recipients:

- **Affiliates:** Our parent companies and subsidiaries (including Thomson Safaris-US, Wineland Adventures, Thomson Safaris Limited (Tanzania), Nature Discovery Limited, Tanzania Conservation Limited), in an effort to bring improved products and services across our family of products and services in accordance with your preferences or other activities as per the Privacy Notice.
- **Our Service Providers:** Vendors, service providers, and consultants that perform services on our behalf or assist us with provision of services to you such as infrastructure providers, IT service providers, marketing and market research, promotions management, data analysis, payment processing, customer service, mail/email delivery, auditing, legal advisors and other services. Further we may disclose your data to our co-branded partners (e.g., World Wildlife Fund, Inc.), booking partners, travel agents, tour and meal service providers, and others involved in your booking and accommodations;
- **Third parties permitted by law:** As per law and regulatory requirement we shall share your information with Governmental authorities or other entities such as police, court, regulators, government agencies and other administrative authorities.
- **Third parties connected with business transfers:** We may transfer your personal information to third parties in connection with a reorganization, restructuring, liquidation, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.
- **Others authorized by you to receive the information**

We may use your information for any purpose or share it with any third party if we anonymize the information so that it no longer reasonably identifies you. Anonymization requires altering your information, so re-identification requires use of only non-public sources. Wherever possible, we require third party service provider use of the information to be anonymized or protected in accordance with industry best practices. We limit who we share your information with and the legitimate business purposes for which it can be used.



We may keep the information we collect until we no longer need the information to provide services to you or complete our transaction with you, to enable us to communicate with you about our service, for our research, evaluation of use, or troubleshooting purposes, for our analysis to improve quality of our services, or to satisfy our legal or contractual obligations.

9. International transfer of information

We may need to transfer the personal data we collect to other parties or service providers outside Tanzania. For instance, the computer servers used to host a website could be located in a third country – this is not unusual given that the internet is a global environment. Your personal information could be held at a destination which offers a different level of data protection. To ensure your personal information remains safe when transferred like this, we will take all reasonable steps to maintain a suitable level of protection in line with this Privacy Policy. In addition, if the country is not considered to have laws that are equivalent to United Republic of Tanzania data protection standards, then we will ask the third party to enter into a legal agreement that reflects those standards.

For more information about the transfer of your Personal Data outside to third countries, please contact us directly at gm@gibbsfarm.com

10. Cookie policy

Cookies are files with small amounts of data, which may include unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. We may use cookies in order to customize this site for return visitors. We may also use cookies to remarket visitors with advertising for more or our content.

11. Third party services

While using the Services you may encounter links to third party websites, services or applications (such as third-party messaging apps). Please keep in mind that this Privacy Policy does not apply to any third-party websites, services or applications, even if they are accessible, downloadable, or otherwise distributed through the Services.

Please be advised that such third-party websites, services or applications are independent from us. We assume no responsibility or liability whatsoever with regard to privacy matters or any other legal matter with respect to such third-party websites and/or services. We encourage you to carefully read the privacy policies and the terms of use of such third-party websites and/or services, as their terms, not ours, will apply to any of your interactions with such third parties.

You should always review their privacy practices carefully before providing Personal Information to such third parties. You are knowingly and voluntarily assuming all risks of using any third-party websites, services or



applications. You agree that we shall have no liability whatsoever with respect to such third-party sites and your usage of them.

12. Your Rights

You may contact us at any time by email to gm@gibbsfarm.com and request: -

- i. To access or delete any Personal Information relating to you;
- ii. To change or update any Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected or deleted);
- iii. that we restrict or cease any further use of your Personal Information;
- iv. That we will provide the Personal Information you volunteered to us
- v. To withdraw your consent to the processing of your Personal Information (such as for marketing purposes);
- vi. To withdraw your consent to our processing activities (provided that such processing activities rely on your consent, and not on a different legal basis);
- vii. To not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you;

Please note that these rights are not absolute and requests are subject to any applicable legal requirements, including tourism regulations and other legal and ethical reporting or document retention obligations. We may also rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion, in accordance with our internal policies.

13. Retention

We will only retain your personal data for as long as necessary for the purpose for which that data was collected and to the extent permitted by applicable laws to enable us to meet our legal obligations under applicable laws or regulations, such as the applicable tourism operations regulations, KYC and AML regulations, as well as to meet our contractual obligations.

14. How we keep your information secured

We take great care in implementing and maintaining the security of the Services and your information. We have put in place appropriate physical and technological safeguards to help prevent unauthorized access, to maintain data security, and to correctly use the information we collect. These safeguards vary based on the sensitivity of the information that we collect and store. We employ industry standard procedures and controls to ensure the safety of our users' information, such as: -

- Secure network topology, which includes intrusion prevention and firewall systems;
- Encrypted communication;
- Authentication and Access Control;
- External and Internal audit tests; etc.

15. Changes to the Privacy Policy



We reserve the right to change this Privacy Policy at any time, so please re-visit our website page frequently. We will provide notice of substantial changes of this Privacy Policy by posting the updated terms on our platforms. Changes to this Privacy Policy are effective as of the stated "Last Revised" date, and your continued use of the Services after the Last Revised date will constitute acceptance of, and agreement to be bound by, those changes

16. Acceptance of this policy

Use of our sites or platform signifies your acceptance of this policy. When registering we will further request your explicit acceptance of the privacy policy.

17. How to contact us

If you have any general questions about the Services or the information that we collect about you and how we use it, please contact us via email at gm@gibbsfarm.com or write to: -

General Manager,
Ngorongoro Safari Lodge Limited,
T/A Gibbs Farm Tanzania,
P.O. Box 280,
Karatu, Arusha, Tanzania