

## **Privacy Policy**

### Introduction

This Privacy Notice (this "Notice") governs the collection and use of personal data by Naseem Chalets and Camps (SPS-LLC) ("Naseem Farm Escape"). We are committed to protecting and respecting your privacy.

This Notice explains how and why we use your personal data and applies to the personal data you either provide to us directly, or which we may obtain from other sources (for example, Logify, our booking portal).

We may use your personal data for the purposes described in this Notice, or as otherwise stated at the point of collection.

For more information about Naseem Farm Escape and its services. Please see <a href="www.naseemfarmescape.com">www.naseemfarmescape.com</a>. References to "our", "us" or "we" within this Notice means Naseem Farm Escape, P.O. Box 11806, Ajman, United Arab Emirates, <a href="mailto:info@naseemfarmescape.com">info@naseemfarmescape.com</a>.

#### **Data Controller and what it means**

We act as the data controller of your personal data. This means that we are responsible for determining how and why your personal data is processed, for example, to offer our services we need to process certain information about you and collect personal data such as contact details.

#### **Personal Data Processing**

Processing basically means anything that is done to or with personal data (including collecting, storing or deleting personal data). Personal data is any information relating to an identified or identifiable living person (for example, name, address, contact details).

## Who are the relevant individuals whose Personal Data we process?

When "you" or "your" are used in this Notice, we are referring to the relevant individuals who are the subject of the personal data. Relevant individuals may include Primary Customers, Secondary Customers, and Children, as defined below:

Primary Customer:	The individual or entity directly engaging with us in relation to our services and/or products.
Secondary Customer:	Individuals associated with the Primary Customer who benefit from our services and/or products.
Children:	Any individuals below 16 years of age.

## What personal data do we collect from you and how do we use it?

To provide services and products to you, we may process different categories of personal data whilst adhering to the data minimization and purpose limitation principles in accordance with the applicable data protection law and regulations (for example, The UAE Federal Decree-Law No.45 of 2021 or other relevant data protection laws and regulations, as applicable), and as described below:

Contact Details:	includes, but is not limited to, home address, contact details, and emergency contact number, where provided.
Identification Data:	includes, but is not limited to, name, title, company, photo, citizenship, nationality, passport data, visa information, driver's license information, resident country's ID.
Sensitive Data:	includes data that reveals racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data for uniquely identifying a natural person, and data concerning health.
Web Data:	includes, but is not limited to user activity logs, IP address, social media profile, and website visitor interaction data.
Financial Data:	includes, but is not limited to, card details and bank details.
Other Personal Data:	includes, but is not limited to, date of birth, age, gender and country of residence.

The reason these categories of personal data are processed, along with our lawful basis for doing so, are set out in the below:

### 1. Customer Service, processing/fulfilling orders and transactions

Description of Processing:	We process your personal data when managing and fulfilling bookings, reservations, and requests.
Purpose of Processing:	Customer service and processing/fulfilling orders and transactions.
Category of Personal Data:	Identification Data, Contact Details, Other Personal Data, Web Data, Travel/Stay information, and Financial Data.
Lawful Basis:	As appropriate, we will process your personal data in reliance upon consent provided.
Storage Period:	Seven (7) years from the data of the last transaction with the customer. For sensitive data, two (2) years from the date of the last transaction with the customer.

## 2. Customer Service

Description of Processing:	We process your personal data during visits, e.g., to provide Wi-Fi to you.
Purpose of Processing:	Customer service.
Category of Personal Data:	Identification Data, Contact Details, Web Data, Travel/Stay information.
Lawful Basis:	Consent.
Storage Period:	Seven (7) years from the data of the last transaction with the customer.

# 3. Account Management

Description of Processing	We process your personal data for invoicing and payment purposes.
Purpose of Processing:	Marketing and Analytics.
Category of Personal Data:	Contact Details, Identification Data, Other Personal Data, Web Data, Travel/Stay Information and Financial Data.
Lawful Basis:	Contract.
Storage Period:	Seven (7) years from the data of the last transaction with the customer.

# 4. Security Purposes

Description of Processing:	Security purposes and to ensure secure backup and archival of IT Systems.
Purpose of Processing:	Security.
Purposes Category of Personal Data:	Contact Details, Identification Data, and car license plate.
Lawful Basis:	Contract.
Storage Period:	Seven (7) years from the data of the last transaction with the customer.

# 5. Health and Safety

Description of Processing:	We process your personal data to provide medical
	care if required.

Purpose of Processing:	Health and Safety.
Category of Personal Data:	Contact Details, Identification Data, Travel/Stay Information.
Lawful Basis:	Consent, Vital Interests and Legal Obligation.
Storage Period:	Seven (7) years from the data of the last transaction with the customer. For sensitive data, two (2) years from the date of the last transaction with the customer.

# 6. Litigation and Disputes

Description of Processing:	We process your personal data to comply with legal requirements and exercise or defend legal claims.
Purpose of Processing:	Litigation and Disputes.
Category of Personal Data:	Contact Details and Identification Data.
Lawful Basis:	Contract.
Storage Period:	Seven (7) years from the data of the last transaction with the customer.

## 7. Marketing

Description of Processing:	We process your personal data for marketing purposes (e.g., offering special discounts to loyal customers, events, etc.) as well as for analytics purposes.
Purpose of Processing:	Marketing and Analytics.
Category of Personal Data:	Contact Details, Identification Data, Other Personal Data, Web Data, Travel/Stay Information.
Lawful Basis:	Contract.
Storage Period:	Seven (7) years from the data of the last transaction with the customer.

# The use of Closed-Circuit Television (CCTV) and Personal Data

We use CCTV on our premises in order to better ensure the safety and security of our customers and our staff. Where we have installed CCTV, we have put signs up so that you are aware of their location(s). We

will process any personal data captured by CCTV on the lawful basis of contractual necessity. If you do not agree to our use of CCTV, please note that we cannot offer our services to you.

Your personal data will not be kept longer than necessary to meet the purposes detailed above. CCTV signage is in place where required by local laws or regulations.

### **Personal Data Indirectly Obtained from Others**

We may also receive information about you from third parties. These are further detailed below:

**Third Party Payment Providers**: As necessary, we obtain your personal data from Logify, our third-party booking provider, to manage your booking and dates of your stay, and to comply with financial and regulatory obligations.

**Social Media Platforms**: As necessary, we obtain your personal data from social media platforms for analytics purposes, to manage and progress complaints, for marketing purposes, to improve the services provided and to conduct surveys.

**Medical Service Providers**: As necessary, we obtain your personal data from medical service providers when accidents and incidents occur, as well as provide medical care when required.

### How long do we keep your personal data?

Your personal data will not be kept longer than necessary to meet the purposes detailed above. The criteria that we use to determine how long we will keep your personal data includes the period during which we have an ongoing relationship with you, and whether we have a legal obligation to store it (for example, for accounting purposes or for litigation, or regulatory investigations purposes).

Should retention of your personal data no longer be required we will remove it from our systems and records and/or take steps to properly anonymise it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which we are subject).

#### Security of your personal data

We have implemented technological and operational security measures to protect personal data from loss, misuse, alteration, or destruction. Only authorised persons are provided access to personal data; such individuals are obligated to maintain the confidentiality of this personal data.

## **Your Rights**

#### 1. Right to withdraw consent

If you have provided your consent to us, you will always have the right to withdraw this at any time. You can do this by either following the information provided at the time you provided your consent, or by contacting us using the following email address info@naseemfarmescape.com. We confirm that we have

noted your withdrawal of consent and confirm this in writing to you. The withdrawal of consent will not affect any processing that was based on consent before its withdrawal.

#### 2. Right to request correction of your personal data

You will always have the right to request that we correct and update any personal data that we process about you that is inaccurate or incomplete. You can do this by contacting us at <a href="info@naseemfarmescape.com">info@naseemfarmescape.com</a>.

### 3. Additional Data Protection Rights

Certain Data Protection Regulations also provide you with additional rights which may allow you to:

- upon request, be provided access to, or copies of, your personal data that we process in a commonly used and machine-readable format;
- upon request, restrict the processing of your personal data;
- upon request, delete your personal data which we process;
- object to our processing of your personal data; or
- lodge a complaint with the supervisory authority in your country of residence, place of work or the country in which an alleged infringement of data protection law has occurred.

It is important to understand that these rights are not absolute (e.g., their application may depend upon the lawful basis we rely upon to process your personal data) and that we may require further information from you (e.g., to confirm your identity) to action your request. You can enquire whether these rights apply to you by contacting us using the following email address at <a href="mailto:info@naseemfarmescape.com">info@naseemfarmescape.com</a>.

### **Contact us**

If you want to exercise any of the rights set out above or have any questions or concerns about how we treat your personal data, please contact us at <a href="mailto:info@naseemfarmescape.com">info@naseemfarmescape.com</a>, or by writing to us at: Naseem Farm Escape, P.O. Box 11806, Ajman, United Arab Emirates.

Please include your reply address when you write to us.

#### **Changes to this Notice**

This Notice is under regular review. We reserve the right, at our discretion, to change, modify, add, or remove sections of this Notice at any time. You are also encouraged to review this Notice from time to time for updates. We will notify you of any changes (including when they will take effect) if we are required to do so by appliable data protection laws.

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