

# Privacy Policy

## Introduction

Jasmine Spa regards customer privacy as an important part of our relationship with our customers. The following privacy policy applies to all Jasmine Spa users, and conforms to Internet privacy standards. If you have questions or concerns regarding this statement, you should first contact Jasmine Spa at [phone number goes here]. Collection of Information In order to use the Jasmine Spa website, we may require information from you in order to provide the best service possible. All correspondence may also be collected and stored, particularly in regard to sales, support and accounts, including Email. Any information collected by Jasmine Spa is collected via correspondence from you or your company. This may be via the telephone, Email, mail, fax or directly through our website.

## Use of Collected Information

Any details collected from Jasmine Spa customers is required in order to provide you with our products and/or services, and a high level of customer service. Correspondence is recorded in order to provide service references, and to assist in our staff development. Storage of Collected Information The security of your personal information is important to us. When you enter sensitive information (such as credit card numbers) on our website, we encrypt that information using secure socket layer technology (SSL). When Credit Card details are collected, we simply pass them on in order to be processed as required. We never permanently store complete Credit Card details. We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. If you have any questions about security on our Website, you can email us at [navadepuyampati@gmail.com](mailto:navadepuyampati@gmail.com)

## Access to Collected Information

If your personally identifiable information changes, or if you no longer desire our service, you may correct, update, delete or deactivate it by emailing us at [navadepuyampati@gmail.com](mailto:navadepuyampati@gmail.com)

## Orders

If you purchase a product or service from us, we may request certain personally identifiable information from you. You may be required to provide contact information (such as name, Email, and postal address) and financial information (such as credit card number, expiration date). We use this information for billing purposes and to fill your orders. If we have trouble processing an order, we will use this information to contact you.

## Communications

Jasmine Spa uses personally identifiable information for essential communications, such as Emails, accounts information, and critical service details. We may also use this information for other purposes, including some promotional Emails. If at any time a customer wishes not to receive such correspondence, they can request to be removed from any mailing lists by emailing us at [relax@gatekeepersdayspa.com.au](mailto:relax@gatekeepersdayspa.com.au). You will be notified when your personal information is collected by any third party that is not our agent/service provider, so you can make an informed choice as to whether or not to share your information with that party. Jasmine Spa may at its discretion use other third parties to provide essential services on our site or for our business processes. We may share your details as necessary for the third party to provide that service. These third parties are prohibited from using your personally identifiable information for any other purpose. Jasmine Spa does not share any information with third parties for any unknown or unrelated uses.

## Legal

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on our Website.

## Links

Links on the Jasmine Spa site to external entities are not covered within this policy. The terms and conditions set out in this privacy statement only cover the domain name of <https://www.jasminespa.vip>

## Changes to Privacy Policy

If we decide to change our privacy policy, we will post those changes to this privacy statement and any other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. We reserve the right to modify this privacy statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, by Email, or by means of a notice on our homepage.

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## Jasmine Spa Privacy Policy

### 1. Mount Lofty House's Commitment to Protecting Privacy

Because we consider you an important customer, our first priority is to offer you exceptional times and stays at our Spa .

Your complete satisfaction and confidence in us are absolutely essential to us.

That's why, as part of our commitment to meeting your expectations, we have set up a customer privacy protection policy. This Charter formalizes our commitments to you and describes how Jasmine Spa uses your personal data.

## 2. Consent

"Personal data" means any information collected and logged in a format that allows you to be identified personally, either directly (e.g. name) or indirectly (e.g. telephone number) as a natural person. Before providing us with this information, we recommend that you read this document describing our customer privacy protection policy.

This Personal Data Protection Charter forms part of the terms and conditions that govern our Spa services. By accepting these terms and conditions, you expressly accept the provisions of this Charter.

## 3. Jasmine Spa Seven Principles for Protecting Your Personal Data

The seven principles below are applicable within the Jasmine Spa Group throughout the world.

**Transparency:** When collecting and processing your personal data, we will communicate all information to you and inform you of the purpose and recipients of the data.

**Legitimacy:** We will collect and process your personal data only for the purposes described in this Charter.

**Relevance and accuracy:** We will only collect personal data that is necessary for data processing. We will take all reasonable steps to ensure that the personal data we hold is accurate and up to date.

**Storage:** We will hold your personal data for the period necessary for processing the same in compliance with the provisions of the law.

**Access, rectification, opposition:** You may access, modify, correct or delete your personal data. You may also oppose the use of your personal data, particularly to avoid receiving sales and marketing information. The details of the department to contact in this respect are shown below (§13) in the clause "Access and modification".

**Confidentiality and security:** We will ensure reasonable technical and organizational measures are in place to protect your personal data against alteration or accidental or unlawful loss, or unauthorized use, disclosure or access.

**Sharing and international transfer:** We may share your personal data within the Jasmine Spa Group or with third parties (such as commercial partners and/or service providers) for the purposes set out in this Charter. We will take appropriate measures to guarantee security when sharing or transferring such data.

For any questions concerning the seven principles of Jasmine Spa Data Protection, please contact the Data Privacy department whose details appear in the clause "Access and modification".

#### 4. Scope of Application

This Charter applies:

To all data processing implemented at Jasmine Spa.

To all reservation websites, including Jasminespa.com but also brand sites.

#### 5. What Personal Data is Collected?

At various times, we will be obliged to ask you, as a Jasmine Spa customer, for information about you and/or members of your family, such as:

Contact details (for example, last name, first name, telephone number, email)

Personal information (for example, date of birth, nationality)

Information relating to your children (for example, first name, date of birth, age)

Your credit card number (for transaction and reservation purposes)

Your membership number for the Jasmine Spa loyalty program or another partner program (for example, the airline loyalty program)

Your Appointment dates

Your preferences and interests (for example, smoking or non-smoking room, preferred floor, type of bedding, type of newspapers/magazines, sports, cultural interests)

Your questions/comments, during or following a stay in one of our establishments.

The information collected in relation to persons under Legal years of age is limited to their name, nationality and date of birth, which can only be supplied to us by an adult. We would be grateful if you could ensure that your children do not send us any personal data without your consent (particularly via the Internet). If such data is sent, you can contact the Data Privacy department ("Access and modification" clause) to arrange for this information to be deleted.

We do not deliberately collect sensitive information, such as information concerning race, ethnicity, political opinions, religious and philosophical beliefs, union membership, or details of health or sexual orientation.

Moreover, depending on applicable local laws, other information could be considered sensitive, such as your credit card number, your leisure activities, personal activities and hobbies, and whether or

not you are a smoker. We may be obliged to collect such information in order to meet your requirements or provide you with an appropriate service, such as a specific diet.

In this case, depending on the laws in force in certain countries, your prior consent may be required with regard to the collection of sensitive information.

## 6. When is Your Personal Data Collected?

Personal data may be collected on a variety of occasions, including:

Spa activities:

Booking a Spa Slot

Appointment For Services and paying

Requests, complaints and/or disputes.

Participation in marketing programs or events:

Signing up for loyalty programs

Participation in customer surveys (for example, the Guest Satisfaction Survey)

Online games or competitions

Subscription to newsletters, in order to receive offers and promotions via email.

Transmission of information from third parties:

Internet activities:

Connection to our website (IP address, cookies)

Online forms (online reservation, questionnaires, our pages on social networks, network login devices such as Facebook login etc.).

## 7. For What Purposes?

We collect your personal data for the purposes of:

Meeting our obligations to our customers.

Managing the reservation of Spa requests:

Creation and storage of legal documents in compliance with accounting standards.

Managing your services at the spa:

Monitoring your use of services.

Managing access to Spa Appointment and services.

Internal management of lists of customers having behaved inappropriately during their stay at the Spa (aggressive and anti-social behaviour, non-compliance with the Spa contract, non-compliance with safety regulations, theft, damage and vandalism, or payment incidents).

Improving our Spa service, especially:

Processing your personal data in our customer marketing program in order to carry out marketing operations, promote brands and gain a better understanding of your requirements and wishes

Adapting our products and services to better meet your requirements

Customizing commercial offers and the promotional messages we send to you

Informing you of special offers and any new services created by Jasmine Spa.

Managing our relationship with customers before, during and after your Spa Services:

Managing the loyalty program

Providing details for the customer database

Segmentation operations based on reservation history and customer travel preferences with a view to sending targeted communications

Predicting and anticipating future behaviours

Developing statistics and commercial scores, and carrying out reporting

Providing context data for the offer push tool when a customer visits a Group website or makes a reservation

Knowing and managing the preferences of new or repeat customers

Sending you newsletters, promotions and tourist, Spa or service offers, or offers from Jasmine Spa. partners, or contacting you by telephone

Managing requests to unsubscribe from newsletters, promotions, tourist offers and satisfaction surveys

Taking into account the right to object

Use a trusted third party to cross-check, analyse and apply certain devices to your collected data at the time of booking or at the time of your stay, in order to determine your interests and your customer profile, and to allow us to send you personalized offers.

Improving Jasmine Spa services, especially:

Carrying out surveys and analyses of questionnaires and customer comments

Managing claims/complaints

Offering you the benefits of our loyalty program.

Securing and enhancing your use of the Jasmine Spa, especially:

Improving navigation

Implementing security and fraud prevention.

Conforming to local legislation (for example, storing of accounting documents).

#### 8. Conditions of Third-Party Access to Your Personal Data

As we are present in many countries, we endeavour to provide you with the same services throughout the world. Thus, to guarantee you the right of access and amendment ("Access and modification" clause), we have to share your personal data with internal and external recipients subject to the following conditions:

Within the Jasmine Spa, in order to offer you the best service, we can share your personal data and give access to authorized personnel from the Group, including:

Spa staff

Reservation staff using Jasmine Spa reservation tools

IT departments

Commercial partners and marketing services

Medical services if applicable

Legal services if applicable

Generally, any appropriate person within Jasmine Spa Group entities for certain specific categories of personal data.

With service providers and partners: your personal data may be sent to a third party for the purposes of supplying you with services and improving your Services, for example:

External service providers: IT sub-contractors, international call centres, banks, credit card issuers, external lawyers, dispatchers, printers.

Commercial partners: Jasmine Spamay, unless you specify otherwise to the Data Privacy department, enhance your profile by sharing certain personal information with its preferred commercial partners. In this case, a trusted third party may cross-check, analyse and apply certain devices to your data. This data processing will allow Jasmine Spa and its privileged contractual partners to determine your interests and your customer profile, and will allow us to send you personalized offers.

Social networking sites: Jasmine Spa may communicate your email address to Facebook in order to identify whether you are already a Facebook user, in order to post personalized and relevant ads on your Facebook account if appropriate.

Local authorities: We may also be obliged to send your information to local authorities if this is required by law or as part of an inquiry and in accordance with local regulations.

## 9. Protection of Your Personal Data During International Transfers

For the purposes set out in Clause 7 of this Charter, we may transfer your personal data to internal or external recipients who may be in countries offering different levels of personal data protection.

Consequently, in addition to implementation of this Charter, Jasmine Spa and Jasmine Spa employees' appropriate measures to ensure secure transfer of your personal data to a Jasmine Spa entity or to an external recipient located in a country offering a different level of privacy from that proposed in the country where the personal data is collected.

As part of these activities, your data may be sent, in particular as part of the reservation process, to Jasmine Spa group located in Hyderabad India.

Other than those that are required to carry out your reservation, dataflows to countries having different levels of personal data protection are regulated by standard contractual manager-to-sub contractor clauses defined by the Indian Law.

## 10. Data Security

Jasmine Spa takes appropriate technical and organizational measures, in accordance with applicable legal provisions, to protect your personal data against illicit or accidental destruction, accidental alteration or loss, and unauthorized access or disclosure. To this end, we have taken technical measures (such as firewalls) and organizational measures (such as a user ID/password system, means of physical protection etc.).

When you submit credit card data when making a reservation, SSL (Secure Socket Layer) encryption technology is used to guarantee a secure transaction.

## 11. Cookies

Use of cookies by Jasmine Spa

You are advised that Jasmine Spa may use cookies or other tracers on its online booking site <https://www.jasminespa.vip>. These tracers may be installed on your device depending on the preferences that you expressed or may express at any time in accordance with this policy.

### 1. Why have a cookies policy?

With a view to provide information and ensure transparency, Jasmine Spa uses Jasmine Spa policy which allows you to learn more about:



The origin and purpose of the information processed when you browse Jasmine Spa and other Jasmine Spa Websites

Your rights with regard to cookies and other tracers used by Jasmine Spa

## 2. What is a cookie?

Cookies and other similar tracers are packets of data used by servers to send status information to a user's browser and return status information to the original server through this same browser.

The status information can be a session identifier, a language, an expiration date, a response field or other types of information.

During their validity period, cookies are used to store status information when a browser accesses various pages of a website or when the browser returns to this website at a later point.

There are different types of cookies:

Session cookies, which are deleted as soon as you exit the browser or leave the website

Persistent cookies, which remain on your device until their expiration or until you delete them using the features of your browser

## 3. Why use cookies?

We use cookies and other tracers primarily for the following purposes:

Cookies strictly necessary for browsing the Jasmine Spa Websites and the ability to use all of their features, and intended in particular to:

Manage authentication of website visitors and the associated security measures, and ensure proper functioning of the authentication module

Optimize the user experience and facilitate browsing, in particular determining "technical routes" for browsing

Store information regarding the "cookies" information banner seen by website visitors who then continue to browse the website after agreeing to accept cookies on their device

Implement security measures (for example, when you are asked to log in again for content or a service after a certain period of time, or to ensure basic operation of Jasmine Spa Websites and use of their major technical features, such as monitoring of performance and browsing errors, management of user sessions, etc.)

Cookies for features intended in particular to:

Adapt Jasmine Spa Websites to the display preferences of your device (language, currency, display resolution, operating system used, configuration and settings of the display of web pages based on the device you are using and its location, etc.)

Store specific information that you enter on Jasmine Spa Websites in order to facilitate and customize your subsequent visits (including displaying the visitor's first and last names if the visitor has a user account)

Allow you to access your personal pages more quickly by storing the login details or information that you previously entered

Cookies for visitor tracking are aimed at improving the comfort of users by helping us understand your interactions with Jasmine Spa Websites (most visited pages, applications used, etc.); these cookies may collect statistics or test different ways of displaying information in order to improve the relevance and usability of our services.

Advertising cookies are intended to (i) offer you, in advertising spaces, relevant, targeted content that may be of interest to you (best offers, other destinations, etc.) based on your interests, browsing behaviour, preferences, and other factors, and (ii) reduce the number of times that the advertisements appear.

Affiliate cookies identify the third-party website that redirected a visitor to Jasmine Spa Websites.

Social network cookies, set by third parties, allow you to share your opinion about and content from Jasmine Spa Websites on social networks (for example, the "Share" or "Like" application buttons for social networks).

The social network applications on Jasmine Spa Websites as mentioned above can in some cases allow the social networks concerned to identify you even if you did not click on the application button. This type of button can allow a social network to track your browsing on Jasmine Spa Websites, simply because your account in the social network concerned is enabled on your device (open session) while you are browsing.

We recommend that you read the policies of these social networks to familiarize yourself with how they use the browsing information they may collect, especially with regard to advertising. These policies must specifically allow you to make choices on these social networks, particularly by configuring your user accounts for each of them.

#### 4. Consent

The installation of certain cookies is subject to your consent. Also, when you first visit the Jasmine Spa Websites, you are asked whether you agree to the installation of this type of cookie, which is only activated after your acceptance.

This process is supported by means of an information banner on the home page of the Jasmine Spa Websites, which informs you that by continuing to browse, you are agreeing to the installation of cookies that require consent on your device.

You can change your mind at any time using the various methods described in section “Deleting and/or blocking cookies”.

## 5. Deleting and/or blocking cookies

You have several options for deleting cookies and other tracers.

### Browser settings

Although most browsers are set by default to accept cookies, you can, if you desire, choose to accept all cookies, always block cookies, or choose which cookies to accept based on their senders.

You can also set your browser to accept or block cookies on a case-by-case basis before they are installed. Your browser also allows you to regularly delete cookies from your device. Remember to configure all the browsers in your different devices (tablets, smartphones, computers, etc.).

Regarding management of cookies and your preferences, configuration varies for each browser. This is described in the Help menu of your browser, as well as how to edit your preferences with regard to cookies. For example:

Saving a cookie to your device depends on your wishes, which you can exercise and change at any time and free of charge using the settings offered by your browser software.

If your browser is set to accept cookies on your device, the cookies embedded in the pages and content that you view may be temporarily stored in a dedicated space on your device. They can only be read by their issuer.

However, you can set your browser to block cookies. Keep in mind that if you set your browser to block cookies, some features, pages and spaces on Jasmine Spa Websites will not be accessible, and we cannot be held responsible in this case.

### Specialized advertising platforms

Several professional advertising platforms also give you the option to accept or block cookies used by companies that are members. These centralized mechanisms do not block the display of ads; they simply prevent the installation of cookies that tailor ads to your interests.

## 12. Storage of Data

We retain your personal data only for the period necessary for the purposes set out in this Charter or in accordance with the provisions of applicable law.

## 13. Access and Modification

You have the right to access your personal data collected by Jasmine Spa and to modify it subject to applicable legal provisions.

You may also exercise your right to object by writing to the address below.

In the event of difficulty exercising your rights, please contact the Data Privacy department for the Jasmine Spa Group directly by sending an email to [data.privacy@JasmineSpa.com](mailto:data.privacy@JasmineSpa.com) or by writing to the address below:

Jasmine Spa

Flat No.6, 2<sup>nd</sup> Floor, Aishwarya Appartment,

Dwarkapuri Colony, Punjagutta, Hyderabad

Telangana, India - 500082

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request.

If your personal data is inaccurate, incomplete or not up to date, please send the appropriate amendments to the Data Privacy department as indicated above.

All requests will receive a response as swiftly as possible and in accordance with applicable law.

You may also exercise your rights in respect of your personal data that is stored and processed by a Spa following a stay. To do this, you must contact the Spa directly.

#### 14. Updates

We may modify this Charter from time to time. Consequently, we recommend that you consult it regularly, particularly when making a reservation at one of our group.

#### 15. Questions and Contacts

For any questions concerning the Jasmine Spa Group's personal data protection policy, please contact the Data Privacy department ("Access and modification" clause).