

# PRIVACY POLICY

## Introduction

Ekko is committed to protecting your privacy.

Ekko respects your privacy and takes the protection of personal information very seriously. The purpose of this policy is to describe the way that we collect, store, use and protect information that can be associated with you or another natural or juristic person and can be used to identify you or that person.

## Audience

This policy applies to you if you are a visitor to our website; or a client (natural or juristic entity) that enquires about or makes use of our products and services.

## Personal Information

Personal information includes:

- information that we collect automatically when you visit our website namely [www.ekko.co.za](http://www.ekko.co.za);
- information we collect when you make use of the products and services as offered on our website;
- information that we collect through various other means as covered later on in this policy; and
- optional information that you provide to us voluntarily;

but excludes:

- information that has been made anonymous so that it does not identify a specific person;
- permanently de-identified information that does not relate or cannot be traced back to you specifically;
- non-personal statistical information collected and compiled by us; and
- information that you have provided voluntarily in an open, public environment or forum including any blog, chat room, community, classifieds, or discussion board (because the information has been disclosed in a public forum, it is no longer confidential and does not constitute personal information subject to protection under this policy).

Common examples of the types of personal information which we may collect and process include your

- identifying information - such as your title, name and surname, identification number, etc;
- contact information - such as your phone number, email address, etc;
- address information - such as your residential address, postal address, business address, nationality, etc;
- benefit usage information – such as resort booking information, restaurant booking information, spa booking information, movie booking information, etc;
- history and future benefit usage information – such as the record of previous benefit usage including the revenue spend as well as future benefit usage information details;
- other information – such as personal preferences, special requests, accompanying guest details (can include details of children e.g. name and surname and age), etc;
- technical and location information – such as information that is generated as a result of, for example using, the ekko website.

We may also collect sensitive personal information including your

- financial information - such as your credit card, bank account details, proof of payments, etc;
- medical and health information - such as information about your physical health, including wheelchair accessibility requests, dietary requirements, allergy information, information shared before SPA treatments, etc.

## Acceptance

You must accept all the terms of this policy when wanting to make use of our products and services.

You may not access our website, make enquiries, or use our products and services if you are younger than 18 years old and do not have the necessary consent or, where you do have the legal capacity to conclude legally binding contracts.

By accepting this policy, you are deemed to have read, understood, accepted and agreed to be bound by all of its terms.

## Changes

We may change the terms of this policy at any time by updating this web page. If you continue to use the website or our products and services following a change to the terms, the changed terms will apply to you and you will be deemed to have accepted those updated terms.



## Collection

### From browsers

We automatically receive and record internet usage information on our server logs from your browser, such as your Internet Protocol address (IP address), browsing habits, click patterns, version of software installed, system type, screen resolutions, colour capabilities, plug-ins, language settings, cookie preferences, search engine keywords, JavaScript enablement, the content and pages that you access on the website, and the dates and times that you visit the website, paths taken, and time spent on sites and pages within the website (usage information). Please note that other websites visited before entering our website might place personal information within your URL during a visit to it, and we have no control over such websites. Accordingly, a subsequent website that collects URL information may log some personal information.

### Cookies

Please refer to the Cookies section below for information on how we deal with Cookies.

### Web beacons

Our website may contain electronic image requests (called a single-pixel gif or web beacon request) that allow us to count page views and access cookies. Any electronic image viewed as part of a web page (including an ad banner) can act as a web beacon. Our web beacons do not collect, gather, monitor or share any of your personal information. We merely use them to compile anonymous information about our website.

### When accessing and making use of our website products and service offerings as well as at various other times

The other times as referred to here includes but are not limited to:

- the period when you are making a resort booking or service reservation,
- the period between making your resort booking or service reservation and arriving at the resort or service provider,
- the period during your stay at a resort or during your use of services,
- the period review and feedback period after your stay at a resort or after using a service,

As there are various options available for making a resort booking or service reservations, we may also be receiving your information from Third Parties.

You are not required to provide any personal information to us, until you become an ekko shareholder, sign up for one of our email newsletters (which can be unsubscribed to at any time), or enter a promotional competition.

Once you become an ekko shareholder, sign up for an email newsletter, or enter a promotional competition, you will no longer be anonymous to us.

We will use the personal information to fulfil your account, provide additional services and information to you as we reasonably think appropriate, and for any other purposes set out in this policy.

### Optional details

You may also provide additional information to us voluntarily (optional information), take advantage of promotions, respond to surveys, complete online forms etc.

## Cookies

### What are cookies?

We may place small text files called 'cookies' on your device when you visit our website. These files do not contain personal information, but they do contain anonymized identifiers. Many websites use cookies and you can find out more about them at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### Why do we use cookies?

These files serve several useful purposes for you, including:

- ensuring the website functions correctly;
- granting you access to restricted content;
- tailoring our website's functionality to you personally by letting us remember your preferences, location or device;
- improving how our website performs;
- understanding who our audience is so that we can provide content most relevant to you;
- allowing third parties to provide services to our website; and
- helping us deliver interest-based advertising where appropriate in compliance with the applicable laws.



## The types of cookies we use

We use different types of cookies on our website. Some of these cookies are placed by us, while others are placed by our third-party plug-ins, suppliers or advertisers. These cookies may be deleted from your device at different times, such as at the end of your browsing session (when you leave the website) or after a pre-set amount of time, or they may persist on your device until you delete them.

We use the following types of cookies on our website:

- essential cookies – these are cookies that allow our website to perform its essential functions. Without these cookies, some parts of our websites would stop working.
- site analytics cookies – these are cookies that monitor how our website is performing, and how you interact with it. We use them to know how best to improve our website or services.
- functional cookies – these are cookies that remember who you are as a user of our website. We use them to remember any preferences you may have selected on our website, like saving your username and pin or settings.
- advertising cookies – these are cookies that match your interests or web searches with applicable advertising campaigns on our website. We use them to provide you with advertising that we think you might find useful.
- social media cookies – these are cookies that integrate with social media platforms. We use them to help you share content from our website to your chosen social media platform.
- flash cookies – these are cookies that help your device read content supported by Adobe Flash. We use them to make sure that any Flash advertisements or videos appear properly on your device.
- third party cookies – these are cookies that some of our business partners use on our website. We have no access to or control over them. Information collected by any of these cookies or widgets is governed by the Privacy Policy of the company that created it, and not by us.

## Deleting cookies

Your internet browser generally accepts cookies automatically, but you can often change this setting to stop accepting them. You can also delete cookies manually.

Deleting or no longer accepting cookies may prevent you from accessing certain aspects of our website where cookies are necessary or cause the website to forget your preferences. Deleting cookies may not prevent you from seeing advertisements on our website, but such advertising may be less relevant to you.

## Purpose for collection

We may use or process personal information, or optional information that you provide to us for the purposes intended when the information was provided to us. Processing includes gathering your personal information, disclosing it, and combining it with other personal information. We generally collect and process your personal information for various purposes, including:

- to provide you use of our products and services – such as fulfilling the contract; managing our relationship with clients, before, during and after the stay or when making use of our products and services; enhanced user experience, client surveys etc.
- legitimate purposes – such as wanting to protect our legitimate interest or that of yours
- marketing purposes – such as pursuing lawful related marketing activities for our legitimate interest;
- business purposes – such as internal audit, accounting, statistical, business planning, and joint ventures, disposals of business, or other proposed and actual transactions; and
- legal purposes – such as where necessary in the performance of a contract; handling claims, complying with regulations, or pursuing good governance.

We may use your usage information for the purposes described above and to:

- remember your information so that you will not have to re-enter next time you access the website, make a resort booking, or service reservation.
- monitor website usage metrics such as the total number of visitors and pages accessed; and
- track your entries, submissions, and status in any promotions or other activities in connection with your usage of the website.

## Consent to collection

We will obtain your consent (where required) to collect personal information under applicable law.



## Use

### Our obligations

We may use your personal information to fulfil our obligations to you.

### Messages and updates

We may send administrative messages and email updates to you about the website, our products and the services that you have requested or received. We may wish to provide you with information about new features, products and services which we think you may be interested in. This means that in some cases, we may also send you primarily promotional messages. We will not send you promotional messages unless you have chosen to opt into them (effective 1 July '21) and we may send you one message asking you to opt into promotional messages without you having opted into promotional messages. We also allow you to opt-out of marketing-related communication.

### Targeted Content

While you are logged into the website, we may display targeted adverts and other relevant information based on your personal information. In a completely automated process, computers process personal information and match it to adverts or related information. We never share personal information with any advertiser, unless you specifically provide us with your consent to do so. Advertisers receive a record of the total number of impressions and clicks for each advert. They do not receive any personal information. If you click on an advert, we may send a referring URL to the advertiser's website identifying that a customer is visiting from the website. We do not send personal information to advertisers with the referring URL. Once you are on the advertiser's website, however, the advertiser may be able to collect your personal information.

## Disclosure

### Sharing

We may share your personal information with

- Anyone making a successful application for access in terms of PAIA;
- Employees, that require personal information to do their jobs and rendering our products and services to you.
- Third-Party supplier and affiliates to provide joint content and services like registration, for transactions and customer support; to help detect and prevent potentially illegal acts and violations of our policies, and to guide decisions about our products, services, and communications;
- Our service providers under contract help provide certain goods or services or help with parts of our business operations, including Audit (Internal and External), IT sub-contractors, fraud prevention, invoicing portal, marketing, technology services, offsite contracted document storage facilities. Our contracts dictate that these goods or services providers only use your information in connection with the goods or services they supply or services they perform for us and not for their benefit;
- Credit bureaus to report account information (as permitted by law) or to perform an affordability assessment;
- Banking partners as required by credit card association rules;
- Regulators, as required by law or governmental audit;
- Law enforcement if required by a subpoena or court order, or to comply with any law, or to protect the safety of any individual or the general public, or to prevent violation of our customer relationship terms; and
- Marketing purposes too for example disclose aggregate statistics (information about the customer population in general terms) about the personal information to advertisers or business partners to provide services (e.g. maintenance, analysis, audit and marketing). They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

### Online WebChat

We may make use of a live online chat facility that will be available on select pages. This chat is permission-based and is initiated by visitors to the website. All chats are monitored for quality assurance purposes.

### Change of ownership

If we change ownership, or a merger with, acquisition by, or sale of assets to, another entity, we may assign our rights to the personal information we process to a successor, purchaser, or separate entity. We will disclose the transfer on the website. If you are concerned about your personal information migrating to a new owner, you may request us to delete your personal information.



## Security

We take the security of personal information very seriously and always do our best to comply with applicable data protection laws. We take practical and reasonable steps to secure your personal information from unauthorised access, use or disclosure. When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Our hosting companies and service providers will host our website and other systems in a secure server environment that uses a firewall and other advanced security measures to prevent interference or access from outside intruders. We have organizational measures such as access controls e.g. user IDs and passwords for accessing systems and we authorise access to personal information only for those employees who require it to fulfil their job responsibilities. We implement disaster recovery procedures where appropriate.

## Accurate and Up To Date

We will endeavour to keep the personal information we collect as accurate, complete and up to date as is necessary for the purposes defined in this policy. You can review or update personal information that we hold on you through accessing your account online or contacting our customer contact centre.

Please note that to better protect you and safeguard your personal information, we take steps to verify your identity before granting you access to your account or making any corrections to your personal information.

## Objection to The Use of or Deleting Your Information

Should you want to object to the processing of your data or request for the personal information you have submitted to us to be deleted then please contact our customer contact centre.

## Retention

We will only retain your personal information for as long as it is necessary to fulfil the purposes explicitly set out in this policy, unless retention of the record is required or authorised by law, or you have consented to the retention of the record. During the period of retention, we will continue to abide by our non disclosure obligations and will not share or sell your personal information.

We may retain your personal information in physical or electronic records at our discretion.

## Transborder flow

We manage central booking engines linked to various resorts and travel service providers which collects the information about your booking and then distribute this to the resort and/or travel service provider booked. Since these resorts and travel service providers operate in multiple countries, we may transmit or transfer personal information outside of the country to a foreign country and process it in that country. Personal information may be stored on servers located in a foreign country whose laws protecting personal information may not be as stringent as the laws in South Africa. We endeavour to protect your personal information during these transfers through the security measures we and our service providers have in place. You consent to us processing your personal information in a foreign country whose laws regarding the processing of personal information may be less stringent.

## Limitation

We are not responsible for, give no warranties, nor make any representations in respect of the privacy policies or practices of linked or any third party websites from [www.ekko.co.za](http://www.ekko.co.za). We encourage you to review the privacy statement of websites you choose to link to from ekko so that you can understand how those websites collect, use and share information. We are not responsible for privacy statements or other content on websites outside of ekko's ecosystem of websites.

## Enquiries

If you have any questions or concerns arising from this privacy policy or how we handle personal information, please notify us accordingly. We will use all commercially reasonable efforts to promptly deal with any questions and / concerns that you might have

Email: [info@ekko.co.za](mailto:info@ekko.co.za)

Telephone: 031 717 7591

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