



**Superior Hotels Kenya**

**SUPERIOR HOTELS KENYA LIMITED**

**PRIVACY NOTICE**

## **INTRODUCTION**

This Policy Notice is guided by the Data Protection Act 2019 (“The Act”) that gives effect to Article 31 of the Constitution of Kenya that dictates every person has a right to privacy. The Act was passed to make provision for the regulation of the processing of personal data; to provide for the rights of data subjects and obligations of data controllers and processors; and for connected purposes

## **PURPOSE AND SCOPE**

This Policy has been developed to guide **Superior Hotels Kenya Limited** on management of data that it collects, uses, stores and otherwise, processing of personal data relating to its customers or any person that visits and interacts with us in our website and social pages, collectively referred to in this Policy as (Data subjects). We are committed to protecting the Data Subjects’ privacy and understand the need to protect all personal data given to us.

This Policy ensures the;

- Company complies with applicable laws and regulations on data protection.
- Protects the rights of its Data subjects.
- Fosters transparency in how it collects, processes and stores people’s data.
- Safeguards itself from the risks of data breaches.

## **PERSONAL DATA WE COLLECT**

Personal data is data that can be used to identify somebody (Data Subject). We collect personal data that you voluntarily provide to us and depends on the purposes for which the personal data is collected and what you have chosen to provide These include; name, postal address, phone number, email address, social media account information, passport details, financial information such as credit or debit card number, IP address, transactional information based on your activities on our website, stay preferences, images and any other information of a personal nature.

You can choose not to provide us with personal data and in instances where consent is provided, you have the right to withdraw it by contacting us. However, if you do so, it may not be possible for us to fulfil the intended purpose for which we require the personal data.

If you provide personal data of anyone other than yourself (e.g. your family members), you are responsible for informing them of the specific purposes for which we are collecting their personal data and to ensure that they have provided valid consent for your provision of their personal data to us.

It is your responsibility to ensure that all personal data that you provide is accurate and complete and to inform us of relevant changes to your personal data.

In case of minors, under 16 years of age, you are required to obtain consent from your parent/guardian before you submit any personal data to us. If you are a parent/guardian of a minor and you have reason to believe your child has provided us with their personal data without your prior consent, please contact us to request for their personal data to be deleted or for the minor to be unsubscribed from our mailing lists.

### ***Ways in Which We Collect Personal Data***

We collect your personal data, directly or indirectly. Some of the purposes include:

- when you make a reservation or stay with us;
- when you visit or make transactions at the food and beverage outlets at the hotel;
- when you apply to be a member of any of our customer loyalty programmes, respond to our promotions, or subscribe to our mailing lists;
- when you participate in competitions, contests or games organized by us;
- when you “Like”, “Follow” or otherwise comment on, connect with or post to one of our social media pages;
- when you attend events or functions organized by us, or conducted at the hotel, for example, sales events, promotional and marketing events and other social events;
- when your images are captured by us via security cameras while you are at the hotel, or when photographs or videos of you are taken when you attend events or functions organized by us. In the latter, it is deemed that you have waived your rights when photos taken during events/ functions organized by us appear on our websites and social pages;
- when you communicate with us by telephone, email, via our website or through other communication channels, for example, through social media platforms;
- when you submit your personal data to us for any other reason.

We may also collect your personal data from third party sources, for example:

- from our business partners such as airlines, tour operators, travel agencies, reservation systems and third parties providing advertising, marketing and promotional services to us;
- from your referees, educational institutions or previous employers (if you have applied to us for a job)
- from your family members or friends who provide your personal data to us on your behalf; and/or
- from public agencies or other public sources.

Generally, we collect, use, disclose and process your personal data for purposes connected or relevant to our business or to manage your relationship with us, such as:

- processing your transactions with us or to provide products and services to you;
- administrative purposes, including finance, IT and HR purposes, quality assurance and staff training;
- security and safety purposes;
- compliance with laws and regulations, internal policies and procedures, including audit, accounting, risk management and record keeping;
- carrying out research and statistical analysis, including development of new products and services or evaluation and improvement of our existing products and services;
- assisting you with your requests, enquiries and feedback;
- enforcing legal obligations owed to us, or responding to complaints, litigation or investigations concerning us;
- such purposes that may be informed to you when your personal data is collected; and/or
- any other reasonable purposes related to the aforesaid.

If you have given your consent, we may use your personal data for the purposes of marketing our products and services and those of our strategic partners and business associates, e.g. informing you of our latest activities, special offers and promotions. In order for us to market products and services which are of special interest and relevance to you, we may analyze and rely on your overall interaction with us (such as but not limited to your participation in promotions or events and your interactions with us).

In addition to collecting, using, disclosing and processing your personal data with your consent or for the performance of a contract entered with you, we may also do so to support our legitimate business interests (provided that this does not override your interests or rights), for example:

- if you make a reservation or stay at our hotel, we may
  - (a) use and disclose your personal data to assist you in making arrangements that you request for, such as arranging tours, airport transfers, restaurant reservations etc.;
  - (b) send you pre-stay communications, post-stay communications and satisfaction surveys;
  - (c) invite you to join our customer loyalty programmes or subscribe to our mailing lists; and

(d) evaluate your preferences to improve and customize your experience for current and future reservations;

- if you are a member of any of our customer loyalty programmes, we may send you

(a) marketing and promotional information about the products and services;

(b) information on events at our hotel which may be of interest to you; and

(c) newsletters and magazines associated with our customer loyalty programmes;

in order to manage our business, we may disclose your personal data to third parties who provide services to us, including our carefully selected service providers and data processors (providing services such as hosting and maintenance services, analysis services, email messaging services, delivery services, handling of payment transactions, marketing, human resources, and professional services) and our management team, consultants and professional advisors (such as accountants, lawyers, auditors) who are required to provide sufficient guarantee about their security measures to protect the processing of personal data; and/or

- in the case of a merger or acquisition, where we may disclose your personal data to a third party who acquires any part of our business or the business of any of our affiliates, whether such acquisition is by way of merger, consolidation, divestiture, spin-off, or purchase of all or a substantial portion of our assets.

We may also collect, use, disclose and process your personal data, without your knowledge or consent, where this is required or permitted by law.

When we contact or send you information for the purposes described above, we may do so by post, e-mail, SMS, WhatsApp, telephone or such other means provided by you. If you do not wish to receive any communication or information from us or wish to restrict the manner by which we may contact or send you information, you may contact us.

### **DATA RETENTION POLICY**

The Company retains personal data only for as long as it is necessary to fulfill the purposes for which it was collected, including to meet legal, regulatory, operational, and legitimate business requirements. Upon expiry of the applicable retention period, personal data is securely deleted, anonymized, or otherwise disposed of in accordance with the Company's data protection procedures.

## **OUR SECURITY AND YOUR DATA**

While every precaution will be taken to ensure that the personal data you provide is protected against unauthorized or unintended access, we cannot be held responsible for unauthorized or unintended access that is beyond our control.

## **REVIEWING THIS NOTICE**

This Privacy Notice may change from time to time to conform with legislation and/or industry developments. The updated Notice will supersede earlier versions and will apply to personal data provided to us previously. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes.

## **CONTACTING US**

If after reviewing this Privacy Notice, you have any questions, complaints or privacy concerns, or would like to make any requests in relation to your personal data, please send an email to [info@superiorhotelskenya.com](mailto:info@superiorhotelskenya.com) .