

PRIVACY POLICY

Introduction

This Privacy Policy explains our personal data practices and the choices you can make about the way your personal data is used. This Privacy Policy gives effect to our commitment to protect your personal data.

Your continued use of the Site will constitute your deemed consent to the terms of this Privacy Policy.

Types of Personal Data We Collect

Information you provide to us: we collect personal data (including where applicable sensitive personal data) you provide directly to us. This includes:

- your full name and contact information, passport and visa information;
- guest stay information;
- your credit card, mobile payment and other payment details;
- any information necessary to fulfill special requests (for example, leisure, travel and guest preferences);
- your reviews, feedback and opinions about us;
- information collected through the use of closed circuit television systems and other security systems; and
- any other personal data you choose to provide to us.

Information We Collect Automatically When You Use our Website: when you access or use the Site, we automatically collect personal data about you, including:

- **Log Information:** we may collect system log information about your use of the Site, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Site.
- **Device Information:** we may collect information about the computer or mobile device you use to access our Site, including the hardware model, operating system and version, unique device identifiers (such as, IP address, IMEI number, the address of the device's wireless network interface, or mobile phone number used by the device) and mobile network information.
- **Location Information:** we may collect information about the location of your device each time you access or use one of our mobile applications or otherwise consent to

the collection of this information. You can turn off location services for a device at any time, but this may turn off some useful features.

- **Information Collected by Cookies and Other Tracking Technologies:** we and our service providers use various technologies to collect information, including cookies and web beacons. Cookies are small data files stored on your hard drive or in device memory that help us improve our Site and your experience, see which areas and features of our Site are popular and count visits. Web beacons are electronic images that may be used in our services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. For more information about cookies, and how to disable them, please see our [Cookies Policy](#).

Where you provide personal data of third parties (for example, names and contact details of your family members in connection with bookings or family memberships), you confirm that you have their consent to provide their personal data to us. We recommend you show them this Privacy Policy.

How We Use Your Personal Data

We may use your personal data for the purposes set out below.

For the performance of our agreement with you, in order to:

- process, confirm, provide and charge for hotel arrangements and restaurant reservations and our goods and services, and administer in person check in and check out;
- fulfill contractual obligations to you, anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers and your employer) and vendors (e.g. credit card companies, airline operators and other loyalty programmes);
- provide you with access to the content on our Site, and respond to your enquiries and requests for information and services; and
- administer, and disclose the winner of, contests and lucky draw competitions conducted by us or on our behalf.

For our legitimate commercial interests, in order to:

- understand how our products and services impact you, provide you with a better, more personalised level of service, and further develop our products and services, including linking or combining with information we get from others to do so;
- monitor your use of our Site and your bookings, and conduct analysis of the use of our Site in order to operate, evaluate and improve our Site and our services, understand your preferences, display customised content to you on our Site which may be of interest to you and troubleshoot any problems;
- conduct market analysis, market research, customer satisfaction and quality assurance surveys to improve our hotels, resorts and services; and
- provide for the safety and security of guests.

To comply with legal obligations to which we are subject:

- meet legal and regulatory requirements and administer general record keeping.

Use of information based on your consent:

- facilitate direct marketing, promotional and customer management purposes, including sending you promotional communications (including without limitation emails and push notifications) or special offers if you have consented to receive the same. Please see section “**Direct Marketing**” below;
- we may use special categories of data (e.g. health data). But we will only do so if we have received your consent thereto; and
- for any other purposes for which we have your consent.

Disclosures of Your Personal Data

We may share your personal data:

- with third-party payment processors, payment service providers, IT and marketing support service providers and other consultants, vendors and service providers who need access to such information to carry out work or provide services on our behalf or who help us to provide the Site to you;

- with anyone involved in the process of making your travel arrangements (e.g. travel agents, group travel organisers and your employer) in order to fulfill contractual obligations;
- with any law enforcement, courts, Government or regulatory bodies (in whatever jurisdiction), or otherwise in response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation, court order or legal process;
- if we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of The Norfolk Lurcher Ltd., our affiliates or others;
- with our advisors, which includes our accountants, auditors, lawyers, other professional advisors and business contacts for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;
- with any other party at your consent or at your direction; and
- otherwise as permitted or required by applicable laws and regulations.

We may also disclose aggregate or de-identified data that is not personally identifiable with third parties, including our commercial and strategic partners.

Overseas Transfers of Your Personal Data

Your personal data will not be transferred out of the EU.

Direct Marketing

From time to time, we would like to use your name, email address, mobile phone number, and other relevant contact information to send you either via emails, SMS messages, telephone calls, push notifications, post, or social media (e.g. WeChat and Facebook) information that we think may be of interest to you, including about our products and services, satisfaction surveys, events, offers and promotions, but we can only do so with your consent.

You may opt-out from receiving marketing communications at any time, free of charge, by following the unsubscribe instructions contained in the marketing communications or contacting The Norfolk Lurcher Ltd. in accordance with the section “**Your Rights and Contact Us**” below.

Retention of Personal Data

To the extent required by law, we take reasonable steps to destroy, or de-identify or redact, personal data in a secure manner when we no longer need it for the purposes for which it was collected (as set out in this Privacy Policy) and retention is no longer necessary for legal or business purposes. In any event, we do not retain your personal data for longer than six (6) years, subject to local laws and regulations.

Our Commitment to Data Security

We have in place reasonable technical and organisational measures to prevent unauthorised or accidental access, processing, erasure, loss or use of your personal data and to keep your personal data confidential. These measures are subject to ongoing review and monitoring. To protect your personal data, we also require our third party service providers to take reasonable precautions to keep your personal data confidential and to prevent unauthorised or accidental access, processing, erasure, loss or use of personal data, and to act at all times in compliance with applicable data protection laws.

We cannot guarantee that our Site will function faultless and without any interruptions. We shall not be liable for damages that may result from the use of electronic means of communication, including, but not limited to, damages resulting from the failure or delay in delivery of electronic communications, interception or manipulation of electronic communications by third parties or by computer programs used for electronic communications and transmission of viruses.

Children and Minors

We do not knowingly collect personal data from minors. If you are a minor, you may only use our Site and services with the permission of your parent or guardian.

Third Party Sites

The Site may contain links to other websites, apps, content, services or resources on the internet which are operated by third parties. If you access other websites, apps, content, services or resources using the links provided, please be aware they may have their own privacy policy, and we do not accept any responsibility or liability for these policies or for any personal data which may be collected through these sites. Please check these policies before you submit any personal information to these sites.

Your Rights and Contact Us

You are entitled to the following rights: right of access to the personal data we hold about you, right of rectification, right to erasure, right to restrict data processing, right to object against profiling and your personal right to data portability. Whenever reasonably possible and required, we will strive to grant these rights within one (1) month. You may also withdraw your consent to receiving direct marketing communications, or more generally to our processing of your personal data, at any time, and you may in certain circumstances ask us to delete your personal data. However, we may not be able to continue providing services to you if you entirely withdraw your consent or ask us to delete your personal data entirely. To make these requests, or if you have any questions or complaints about how we handle your personal data, or would like us to update the data we maintain about you and

your preferences, please contact us by email at the-norfolklurcher@hotmail.com or by post at The Norfolk Lurcher, High House Farm Lane, Colton, Norfolk, NR9 5DG.

Changes to the Privacy Policy

We may modify this Privacy Policy from time to time. Any changes to this Privacy Policy will be posted to the Site so that you are always informed of the way we collect and use your personal data, and we encourage you to review this Privacy Policy whenever you access the Site or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. Updated versions of this Privacy Policy will include the date of the revision at the end of this Privacy Policy so that you are able to check when the Privacy Policy was last amended. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy on the Site. Use of the Site following such changes constitutes your acceptance of the revised Privacy Policy then in effect but, to the extent such changes have a material effect on your rights or obligations as regards our handling of your personal data, such changes will only apply to personal data after the changes are applied.

Last Updated: 24 May 2018

COOKIES POLICY

This policy ("**Cookies Policy**") is issued by The Norfolk Lurcher Ltd. (referred to as "**we**", "**us**", "**our**"). This Cookies Policy applies to our use of cookies in connection with our website www.the-norfolk-lurcher.com ("**Site**").

By continuing to use our Site, you are agreeing to our use of cookies in the manner set out in this Cookies Policy.

If you not wish to accept cookies in respect of your use of this Site, you should stop using the Site, or turn off your cookies (see paragraph 4), but this may affect the functionality of the Site.

1. WHAT THIS COOKIES POLICY COVERS

This Cookies Policy sets out:

- what a cookie is (*paragraph 2*);
- an overview of the cookies we use (*paragraph 3*);
- what you can do if you do not agree to the use of the cookies (*paragraph 4*); and
- further information about cookies in general (*paragraph 5*).

2. WHAT IS A COOKIE?

After you enter the Site, the Site will make use of "cookies". Cookies are small text files containing small amounts of information which are downloaded and may be stored on any of your internet enabled devices e.g. your computer, smartphone or tablet - like a memory for a web page. This Cookies Policy provides you with

information about the cookies we use and why. Our Privacy Policy sets out full details of the other information we may collect and how we may use your personal data. If you do not wish to accept cookies in connection with your use of this Site, you should stop using it or turn off your cookies (see paragraph 4 below for how to do this) but this may affect the functionality of the Site.

3. COOKIES USED ON THE SITE

We use several different types of cookies. In particular, we use the following first party cookies: **necessary cookies** which allow certain fundamental features of the Site to work; **functional cookies**, which allow us to remember choices you make (e.g. your cookie preference), **performance cookies**, which monitor usage of the Site and **advertising cookies** which record the fact that you have visited the Site and then which links you have accessed whilst you use the Site.

We also use **third party cookies** - these are cookies that are set by a third party website or applications rather than by us. In particular, the Site allows cookies of third party social networks (e.g. Facebook and LinkedIn), and this enables a user to share content of the Site on social networks. These third parties may use cookies, but their use of cookies will not be governed by this Cookies Policy.

Some of these are **session cookies** which are temporary and allow us to link your actions during a browser session. These are deleted at the end of your browsing session. Others are **persistent cookies** which remain on your device for the period of time specified in the cookie. These cookies help us identify you as a unique user (by storing a randomly generated number).

The Site uses first party cookies for the following purposes:

a) *necessary cookies*

Necessary cookies are essential and help you navigate the Site. These cookies make sure your basket is saved during all steps of the checkout process. This helps to support security and basic functionality of the Site. These cookies are necessary for the proper operation of our Site, so if you block these cookies we cannot guarantee your use or the security of our Site during your visit.

b) *functional cookies*

Functional cookies are used to provide you the best user experience. These cookies are for instances used to save and remind you about reservations you have started to make, so will save you time if you want to complete your reservation at a later stage. These cookies could also recognise if a Site user has already signed up for our newsletter/requested information about a service or if the user is seeing a certain page for the first time.

c) *performance cookies*

Performance cookies help us to understand the behaviour of our visitors and the usage of the Site. This allows us to continuously improve the Site to provide you the best user experience. These cookies are also used to help us understand what interests our users, and measure how effective our advertising is. Some of these cookies are managed by third parties, and you may refer to the third parties' own website privacy notifications for further information.

By way of example, we use Google Analytics cookies to obtain an overall view of visitor habits and visitor volumes, and to help improve the overall experience on our Site. Google Analytics is a third-party web analysis service provided by Google Inc, which uses "performance cookies" and "targeting cookies" to analyse how you use the Site. The information generated by the cookie about your use of the Site (including your IP address) will be transmitted to and stored by Google on servers in the United States.

On behalf of us, Google will use the information collected for the purpose of evaluating your use of our Site, compiling reports on Site activity and providing other services relating to Site activity and internet usage to us. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser as described below. Furthermore you can prevent Google's collection and use of data (cookies and IP address) by downloading and installing the browser plug-in available under <https://tools.google.com/dlpage/gaoptout?hl=en-GB#>. You may disable the use of Google Analytics by using the link [disable Google Analytics](#). This link creates an opt-out cookie which prevents the further processing of your data. For more information about Google Analytics cookies, please see Google's [help pages](#) and [privacy policy](#).

If you do not accept the use of these cookies, we cannot guarantee how our Site will perform for you.

d) advertising cookies

Advertising cookies will remember your preferences and, in general, that you visited the Site. We strive to provide you with advertisements for hotels, resorts, and other products and services relevant to you and your interests on other online platforms, where available. These cookies are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of advertisements.

More specifically, we may use the following cookies on our Site:

Performance Cookies

- **Google Analytics** stored by Google for 1 day to 2 years, depending on the cookies
 - We use Google Analytics to help analyse which pages on our website visitors viewed. When you visit our website, your web browser automatically sends certain information to Google. For further information on how Google uses your data, please refer to <https://www.google.com/intl/en/policies/privacy/partners/>. To opt-out, please click: [here](#).

4. CONTROL YOUR COOKIE SETTINGS

We shall store a cookie on your computer or device to remember this for next time. You can change your browser settings so that you receive a warning before certain

cookies are stored. You can also adjust your settings so that your browser refuses most of our cookies or only certain cookies from third parties. If you wish to withdraw your agreement at any time, you will need to delete our cookies using your internet browser settings. You should do this through the browser settings for each browser you use. Please be aware that some of our services will not function if your browser does not accept cookies. However, you can allow cookies from specific websites by making them “trusted websites” in your internet browser. The following links may assist you in managing your cookies settings, or you can use the 'Help' option in your internet browser for more details.

- Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>
- Mozilla Firefox: <http://support.mozilla.com/en-US/kb/Cookies>
- GoogleChrome: <http://www.google.com/support/chrome/bin/answer.py?hl=en&answer=95647>
- Safari: <http://support.apple.com/kb/PH5042>
- Opera: <http://www.opera.com/help/tutorials/security/privacy/>
- Adobe (flash cookies): <https://www.adobe.com/support/flash/downloads.html>

To block Google Analytics cookies specifically, you can install the “Google Analytics Opt-out Browser Add-on” provided by Google. If you share the use of a computer, accepting or rejecting the use of cookies may affect all users of that computer.

The above instructions on browser settings are relevant when you use or access our website www.shangri-la.com.

5. OTHER INFORMATION

The following link contains further information about cookies:

- <http://www.aboutcookies.org>.

In addition, a guide to online privacy has been produced by the internet advertising industry which can be found at:

- <http://www.youronlinechoices.eu>
- <http://www.aboutads.info>

We may change this Cookies Policy from time to time by posting the updated version of the policy on our Site. Please check this Site periodically to be informed of any changes.

6. CONTACT US

If you have any questions about the cookies used on our website, please contact us at the-norfolklurcher@hotmail.com.