

# PRIVACY POLICY

We, at First Group, recognise the importance of protecting the privacy of certain information or data collected about our users, prospective users, or other customers.

This privacy policy discloses what information we gather, how we use it, how to correct or change it, and how to access personal information records.

## Collection of Information

First Group only collects personal information that is necessary for business purposes. We collect personal information by requesting it from you. Generally, this occurs when you register on one of our websites, or on mobile apps, request information from us, or participate in activities on our websites. At these times, you provide contact information which may include name, address and e-mail address. When you purchase or utilise products and/or services from us, we will note, for example, your contact information, credit card information, the type of services or products purchased, and the date of purchase. When other information such as gender, date of birth, number of children, and product and/or service preferences is associated with personal information, this also becomes personal information for the purposes of this Privacy Policy. Refer to the POPIA policy link on the website.

## Use of Internet Protocol ("IP") Addresses

An IP address is a unique number that allows your computer to be identified by web servers that serve up web pages. This, in turn, allows us to identify and gather general information and data about you, such as the web pages you view. First Group collects IP addresses for the purposes of system administration, to report information to our business partners, and in order to track and audit the use of our own websites. When users request pages from First Group's websites, our servers log the users' IP addresses.

## Use of Cookies

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to "remember" your actions or preferences over time, however, you can set your browser to decline certain types of cookies or specific cookies. Further, users can delete cookies at any time. We use cookies to learn how you interact with our website content and to improve your experience when visiting our website(s). For example, some cookies remember your language or preferences so that you do not have to repeatedly make these choices when you visit one of our websites. At First Group we use session cookies which are temporary cookies that are used to remember the information you provide during the course of your visit to the website, and they expire when you close the web browser.

Please note that most browsers automatically accept cookies. Therefore, if you do not wish cookies to be used, you may need to actively delete or block the cookies. If you reject the use of cookies, you will still be able to visit our websites but some of the functions may not work correctly. You may also visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for details on how to delete or reject cookies, and for further information on cookies generally. By using our website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not specifically deleted or rejected on your device.

## **Uses of Personal Information**

As a general rule, First Group does not, and will not, sell or rent your personal information. We will use and disclose your personal information to others as stated in this Privacy Policy. We may use Personal Information in many ways, including sending you information on products and/or services and promotions. We may share your Personal Information with third parties so that these third parties can send you offers and or promotional materials. We will always seek the consent of Members, additional users or their guests before disclosing data relating to them for the making of offers by third parties, by informing Members, additional users or their guests of an intention to process their data for such purposes and offering them a possibility to opt out of such use of their data, in a form or document returned to each of them or alternatively by notifying each of them, by telephone, fax or e-mail.

We may use Personal Information to complete transactions requested by you on our websites, for example, or to send you communications either about your membership with us or about features of our websites, including future changes to this Privacy Policy.

We may use Personal Information to monitor site traffic, to personalise the site and to send emails. We also use your Personal Information for internal quality assurance purposes.

Usually, First Group and its business partners use your information to operate the websites and to deliver services. First Group also uses your information to inform you about other products and/or services available from First Group from time to time. In addition, where necessary, your information may be retained for legal or research purposes:

for example:

- To gather contact information;
- To confirm and verify your identity or to verify that you are an authorised user for security purposes;
- For the detection and prevention of fraud, crime, money laundering or other malpractice;
- To conduct market or customer satisfaction research, or for statistical analysis;
- For audit and record-keeping purposes;
- In connection with legal proceedings.

## **Sharing and disclosing information**

The following describes some of the ways that your Personal Information may be disclosed. This is not an exhaustive list but serves by way of illustration only.

**Business Partners:** First Resorts provides Personal Information in order to facilitate a booking request or to generate leads to destination operators in connection with their offers. Many promotions also offer opportunities to request additional information from business partners. By requesting such information, you give First Resorts permission to transfer your Personal Information to the business partner for related use.

**Third Party and Aggregate Data:** From time to time, you may be offered the opportunity to receive materials or special offers from third parties. If you receive information from these third parties, First Resorts will share your name, e-mail address and other Personal Information with such third parties.

Other: First Resorts may disclose Personal Information if required to do so by law, court order or as requested by a governmental or law enforcement authority or in special cases when we have reason to believe that disclosing this Personal Information is otherwise necessary or advisable.

We have agreements in place to ensure that they comply with the privacy requirements as required by the Protection of Personal Information Act. Refer to our POPIA policy link on the website.

### **Linking to a third party web site**

You should be aware that when you are on First Group websites you could hyperlink or be directed to other websites that are not under our control and/or outside our service. For example, if you click on a banner advertisement or a First Group search result, the click may transfer you off this website. Once you link to a third-party website and leave our website, your interaction with such third-party websites will no longer be governed by our Terms and Conditions or Privacy Policy. Accordingly, your use of these third-party sites is at your own risk and is subject to the terms of use and policies set out at such sites. First Group's inclusion of hyperlinks to these third-party websites does not imply any endorsement of, or responsibility or liability for, the material on such website or any association with their owners or operators. When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal information that we remain responsible for, is kept secure. We will ensure that anyone to whom we pass your personal information agrees to treat your information with the same level of protection as we are obliged to.

### **Loyalty Programmes**

First Loyalty is a loyalty programme which offers free and paid rewards, such as discounts on an incredible variety of lifestyle benefits. In such context, we may process your Personal Data in order to be able to create your online First Group Loyalty profile, including:

- i) sending you an activation link by e-mail;
- ii) providing you with information on your rewards points;
- iii) registering your bookings and award points to your membership card;
- iv) informing you about your rewards once you reach a certain points level; and
- v) notifying you about any changes to the First Loyalty programme.

### **Securing your Personal Information**

The security of all information associated with our users is important to us. We exercise reasonable care in providing secure transmission of your information from your computer to our servers. Unfortunately, given that we do not control transmissions or traffic over the Internet or through third-party communication service providers, we cannot guarantee or warrant the security of such transmission of your personal information. Your use of the Internet and our website, including your transmission of information to us, is at your own risk. We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your personal information remains secure. Refer to the POPIA link on our website.

### **Your acceptance of these terms**

By using our websites, you signify your agreement with First Group's Privacy Policy. First Group reserves the right, at its sole discretion, to modify, alter or otherwise update this Privacy Policy at any time without prior notice. Such revised policy shall be effective immediately upon posting and shall govern your rights and our obligations with respect to the use, disclosure and protection of your personal information. You should check this Privacy Policy periodically for, and read carefully, any such revised policy if you are concerned about how your personal information will be utilised and before continuing your use of First Group's website. Your continued use of First Group's website following the posting of changes to these terms will mean you accept those changes.

### **Your Rights: Access to information**

You have the right to request a copy of the personal information we hold about you. To do this, simply contact us at the numbers/addresses as provided on our website and specify what information you require. We will need a copy of your ID document to confirm your identity before providing details of your personal information held according to our records. Refer to our POPIA Manual and PAIA manual on the website.

### **How to contact us**

If you have any queries about this notice, need further information about our privacy practices, wish to withdraw consent, or exercise preferences or access or correct your personal information, please contact us at: [info@firstgroup-sa.co.za](mailto:info@firstgroup-sa.co.za).