

## PRIVACY POLICY

Last updated: [20<sup>th</sup> June 2024]

Thank you for choosing to be part of our community at Kognoscenti (Pvt) Ltd ("Company," "we," "us," or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice or our practices with regard to your personal information, please contact us at [dpo@sooriya.com](mailto:dpo@sooriya.com).

This privacy notice describes how we might use your information if you:

- Visit our website at <https://www.sooriya.com>
- Use our Facebook application <https://www.facebook.com/Sooriya.Resort.Spa/>
- Engage with us in other related ways, including any sales, marketing, or events

In this privacy notice, if we refer to:

- "**Website**" we are referring to any website of ours that references or links to this policy
- "**App**" we are referring to any application of ours that references or links to this policy, including any listed above
- "**Services**" we are referring to our Website, App, and other related services, including any sales, marketing, or events

The purpose of this privacy notice is to explain to you in the clearest way possible what information we collect, how we use it, and what rights you have in relation to it. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

**Please read this privacy notice carefully as it will help you understand what we do with the information that we collect.**

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# 1. WHAT INFORMATION DO WE COLLECT?

## Personal information you disclose to us

***In Short:*** We collect personal information that you provide to us.

We collect personal information that you voluntarily provide to us when you register on the Services, express an interest in obtaining information about us or our products and Services, participate in activities on the Services, or otherwise when you contact us.

## The personal information we collect may include the following:

- Names
- Phone numbers
- Email addresses
- Mailing addresses
- Contact preferences
- Contact or authentication data
- Billing addresses
- Other similar information

**Payment Data:** We may collect data necessary to process your payment if you make purchases, such as your payment instrument number (e.g., credit card number) and the security code associated with your payment instrument. All payment data is stored by Cybersource.

You may find their privacy notice link(s) here: <https://www.cybersource.com/en-us/about/dpa.html>.

## Information automatically collected

***In Short:*** Some information — such as your Internet Protocol (IP) address and/or browser and device characteristics — is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information. This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

**Like many businesses, we also collect information through cookies and similar technologies.**

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## The information we collect includes:

*Log and Usage Data:* This is service-related, diagnostic, usage, and performance information our servers automatically collect when you access or use our Services and which we record in log files. This log data may include your IP address, device information, browser type and settings, and information about your activity in the Services (such as the date/time stamps associated with your usage, pages and files viewed, searches, and other actions you take, such as which features you use), device event information (such as system activity, error reports, and hardware settings).

*Location Data:* We collect location data, such as information about your device's location, which can be either precise or imprecise. How much information we collect depends on the type and settings of the device you use to access the Services. For example, we may use GPS and other technologies to collect geolocation data that tells us your current location (based on your IP address). You can opt out of allowing us to collect this information either by refusing access to the information or by disabling your Location setting on your device. Note, however, if you choose to opt out, you may not be able to use certain aspects of the Services.

## Information collected through our App

***In Short:*** We collect information regarding your push notifications and Facebook permissions when you use our App.

If you use our App, we also collect the following information:

*Push Notifications:* We may request to send you push notifications regarding your account or certain features of the App. If you wish to opt out from receiving these types of communications, you may turn them off in your device's settings.

*Facebook Permissions:* By default, we access your [Facebook](#) basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, check-ins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the [Facebook Permissions Reference](#) page. This information is primarily needed to maintain the security and operation of our App, for troubleshooting, and for our internal analytics and reporting purposes.

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## 2. HOW DO WE USE YOUR INFORMATION?

***In Short:*** We process your information for purposes based on legitimate business interests, the fulfilment of our contract with you, compliance with our legal obligations, and/or your consent.

We use personal information collected via our Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

### We use the information we collect or receive:

- To facilitate account creation and logon process.
  - To post testimonials, with your consent.
  - To request feedback.
  - To enable user-to-user communications with each user's consent.
  - To manage user accounts.
  - To send administrative information to you.
  - To protect our Services.
  - To administer prize draws and competitions.
  - To deliver and facilitate the delivery of services to the user.
  - To respond to user inquiries and offer support to users.
  - To send you marketing and promotional communications.
  - To deliver targeted advertising to you.
  - For other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our Services, products, marketing, and your experience.
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- **To enforce our terms, conditions, and policies for business purposes, to comply with legal and regulatory requirements, or in connection with our contract.**
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- **To respond to legal requests and prevent harm.**
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- **To fulfil and manage your orders, payments, returns, and exchanges made through the Services.**

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### 3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

***In Short:*** We only share information with your consent, to comply with laws, to provide you with services, to protect your rights, or to fulfil business obligations.

We may process or share your data based on the following legal bases:

**Consent:** We may process your data if you have given us specific consent to use your personal information for a specific purpose.

**Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.

**Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.

**Legal Obligations:** We may disclose your information where we are legally required to do so to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process.

**Vital Interests:** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person, and illegal activities.

We may need to process your data or share your personal information in the following situations:

**Business Transfers:** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

**Vendors, Consultants, and Other Third-Party Service Providers:** We may share your data with third-party vendors, service providers, contractors, or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include payment processing, data analysis, email delivery, hosting services, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Services, which will enable them to collect data on our behalf about how you interact with our Services over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content, pages, or features, and better understand online activity.

**WE DO NOT SHARE OR SELL YOUR INFORMATION WITH ANY THIRD PARTIES FOR THEIR MARKETING PURPOSES.**

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## 4. WHO WILL YOUR INFORMATION BE SHARED WITH?

***In Short:*** We only share information with the following third parties.

We only share and disclose your information with the following third parties.

We have categorized each party so that you may easily understand the purpose of our data collection and processing practices. If we have processed your data based on your consent and you wish to revoke it, please contact us using the contact details provided in the section below titled "[HOW CAN YOU CONTACT US ABOUT THIS NOTICE?](#)".

### ***Advertising, Direct Marketing, and Lead Generation***

- Google AdSense

### ***Content Optimization***

- Google Site Search

### ***User Account Registration and Authentication***

- Facebook Login

## 5. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

***In Short:*** We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

## 6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?

***In Short:*** We may transfer, store, and process your information in countries other than your own.

Our servers are located in the United Kingdom, and Sri Lanka. If you are accessing our Services from outside these countries, please be aware that your information may be transferred to, stored, and

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processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in the United Kingdom, and Sri Lanka, and other countries.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK), then these countries may not have data protection or other laws as comprehensive as those in your country. However, we will take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

## 7. HOW LONG DO WE KEEP YOUR INFORMATION?

***In Short:*** We keep your information for as long as necessary to fulfil the purposes outlined in this privacy notice unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise such information, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 8. HOW DO WE KEEP YOUR INFORMATION SAFE?

***In Short:*** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure, so we cannot promise or guarantee that hackers,



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cybercriminals, or other unauthorized third parties will not be able to defeat our security and improperly collect, access, steal, or modify your information. Although we will do our best to protect your personal information, transmission of personal information to and from our Services is at your own risk. You should only access the Services within a secure environment.

## 9. DO WE COLLECT INFORMATION FROM MINORS?

***In Short:*** We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Services, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Services. If we learn that we have collected personal information from users less than 18 years of age without verification of parental consent, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [dpo@sooriya.com](mailto:dpo@sooriya.com).

## 10. WHAT ARE YOUR PRIVACY RIGHTS?

***In Short:*** You may review, change, or terminate your account at any time.

If you are a resident in the European Economic Area (EEA) or United Kingdom (UK) and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here:

[https://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

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## 11. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalised. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 12. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

***In Short:*** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.

California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Services, you have the right to request removal of unwanted data that you publicly post on the Services. To request removal of such data, please contact us using the contact information provided below and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Services, but please be aware that the data may not be completely or comprehensively removed from all our systems (e.g., backups, etc.).

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## 13. DO WE MAKE UPDATES TO THIS NOTICE?

**In Short:** Yes, we will update this notice as necessary to stay compliant with relevant laws.

We may update this privacy notice from time to time. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 14. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may contact our Data Protection Officer (DPO), The Manager, Sooriya Resort \* & Spa, by email at [dpo@sooriya.com](mailto:dpo@sooriya.com), by phone at +1 (555) 555-5555, or by post to:

**Kognoscenti (pvt) Ltd**  
Attn: Data Protection Officer  
Sooriya Resort & Spa  
No 4A, Ohlums Place  
Colombo 08  
Sri Lanka

## 15. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by clicking [here] or contacting us at [dpo@sooriya.com](mailto:dpo@sooriya.com). We will respond to your request within 30 days.

**By using our services, you agree to this Privacy Policy.**