

# Privacy & Cookies Policy

## Background:

This Policy applies as between you, the User of this Web Site and the owner and provider of this Web Site. This Policy applies to our use of any and all Data collected by us in relation to your use of the Web Site and any Services or Systems therein.

## 1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

<b>"Account"</b>	means collectively the personal information, Payment Information and credentials used by Users to access the Web Site and / or any communications System on the Web Site;
<b>"Content"</b>	means any text, graphics, images, audio, video, register
<b>"Cookie"</b>	means a small text file placed on your computer by Villa Buddha when you visit certain parts of this Web Site. This allows us to identify recurring visitors and to analyze their browsing habits within the Web Site. Further details are contained in Clause 10 of this Policy;
<b>"Data"</b>	means collectively all information that you submit to the Web Site. This includes, but is not limited to, Account details and information submitted using any of our Services or Systems;
<b>"Service"</b>	means collectively any online facilities, tools, services or information that Villa Buddha makes available through the Web Site either now or in the future;
<b>"System"</b>	means any online communications infrastructure that Villa Buddha makes available through the Web Site either now or in the future.
<b>"User" / "Users"</b>	means any third party that accesses the Web Site and is not employed by Villa Buddha and acting in the course of their employment; and
<b>"Web Site"</b>	means the website that you are currently using and any sub-domains of this site unless expressly excluded by their own terms and conditions

## 2. Data Collected

2.1 Villa Buddha will collect only such Data as is deemed necessary to identify you and enable full use of the Services and Systems provided on the Web Site.

2.2 To identify you and enable full use of the Services and Systems of the Web Site Data collected will include Data provided by you plus Data identified via electronic means. Such Data will include:

2.2.1 name;

2.2.2 contact information such as email addresses, mailing address and telephone numbers;

2.2.3 IP address (automatically collected);

2.2.4 web browser type and version (automatically collected);

2.2.5 operating system (automatically collected);

2.2.6 a list of URLs starting with a referring site, your activity on this Web Site, and the site you exit to (automatically collected);  
and

2.2.7 Cookie information (see Clause 11 below).

## 3. Our Use of Data

3.1 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties. This includes our affiliates and / or other companies within our group.

3.2 Your Data will be used by us to facilitate your use of our Web Site and to provide you with the best possible service and experience when using our Web Site. Specifically, Data may be used by us for the following reasons:

3.2.1 contact for the purposes of providing requested support services;

3.2.2 internal record keeping;

3.2.3 improvement of our products / services;

3.2.4 transmission by email of promotional materials that may be of interest to you;

3.2.5 contact for market research purposes which may be done using email. Such information may be used to customize or update the Web Site.

3.3 Any personal Data you submit will be retained by Villa Buddha for as long as you use the Services and Systems provided on the Web Site (see Clause 4. Your Data Rights).

3.4 All personal Data is stored securely in accordance with the security principles specified within EU General Data Protection Regulation (GDPR). For more details on security, see Clause 10 below.

3.5 Villa Buddha respect your privacy but reserve the right to disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process, to protect our property and rights or the property and rights of a third party or to prevent or stop activity we consider to be illegal or unethical. Where we are not legally restrained from doing so we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

## 4. Your Data Rights

4.1 You have the right to withdraw your consent for us to retain your Data at any point. Upon receipt of your instruction to delete your Data Villa Buddha will terminate your access to the Web Site and delete your Data after 180 days (the 180 day retention period is to enable Villa Buddha to respond to any Court authorized request from government or law enforcement officials for its disclosure).

4.2 You have the right to query our collection, retention or use of your Data with the nominated Data Controller at Villa Buddha

4.3 You have the right to lodge a complaint regarding our collection, retention or use of your Data with the Malta Information Commissioners Office

## 5. Third Party Web Sites and Services

Villa Buddha may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment handling, delivery of purchased items, search engine facilities, email distribution, advertising and marketing. The providers of such services do have access to certain personal Data provided by Users of this Web Site. All Data used by such parties is used only to the extent required by them to perform the services that Villa Buddha requests. Any use for other purposes is strictly prohibited. Furthermore, any Data that is processed by third parties must be processed within the terms of this Policy and in accordance with the EU General Data Protection Regulation (GDPR).

## 6. Changes of Business Ownership and Control

6.1 Villa Buddha may, from time to time, expand or reduce its business and this may involve the sale of certain divisions or the transfer of control of certain divisions to other parties. Data provided by Users will, where it is relevant to any division so transferred, be transferred along with that division and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the Data for the purposes for which it was supplied by you.

6.2 In the event that any Data submitted by Users will be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your Data deleted or withheld from the new owner or controller.

## 7. Controlling Access to your Data

7.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:

7.1.1 use of Data for direct marketing purposes; and

7.1.2 sharing Data with third parties.

## 8. Your Right to Withhold Information

8.1 You may access certain areas of the Web Site without providing any Data at all. However, to use all Services and Systems available on the Web Site you may be required to submit your Data.

8.2 You may restrict your internet browser's use of Cookies. For more information see Clause 10 below.

## 9. Accessing your own Data

9.1 You may access your Account at any time to view or amend the Data. You may need to modify or update your Data if your circumstances change. Additional Data as to your marketing preferences may also be stored and you may change this at any time.

9.2 You have the right to ask for a copy of your personal Data on payment of a small fee.

## 10. Security

10.1 Data security is of great importance to Villa Buddha and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected online.

## 11. Cookies

11.1 Villa Buddha may set and access Cookies on your computer. First-party Cookies that may be placed on your computer are detailed in Schedule 1 and third-party Cookies that may be placed on your computer are detailed in Schedule 2. Villa Buddha has carefully chosen these Cookies and uses them to facilitate certain functions and features of the Web Site. We also use Cookies for analytics purposes. These Cookies track your movements and activities on the Web Site and are designed to give us a better understanding of our users, thus enabling us to improve the Web Site and our services.

11.2 None of the Cookies set by the Web Site jeopardize your privacy in any way and no personal data is collected. By giving your consent to the setting of our Cookies you are enabling us to provide the best possible experience and service to you through our Web Site. If you wish to deny your consent to the placing of Cookies, certain features of the Web Site may not function fully or as intended.

11.3 Certain features of the Web Site depend upon Cookies to function and are deemed, within the law, to be strictly necessary. These Cookies are detailed in Schedule 1. You will not be asked for your consent to place these Cookies however you may still disable cookies via your web browser's settings, as set out in sub-Clause 11.4.

11.4 You can choose to enable or disable Cookies in your web browser. By default, your browser will accept Cookies, however this can be altered. For further details please consult the help menu in your browser. Disabling Cookies may prevent you from using the full range of Services available on the Web Site.

11.5 You may delete Cookies at any time however you may lose any information that enables you to access the Web Site more quickly.

11.6 The Web Site uses the third-party Cookies detailed in Schedule 2 for the purposes described therein. These Cookies are not integral to the services provided by the Web Site to you and may be blocked at your choosing via your internet browser's privacy settings.

11.7 It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your browser if you are unsure as to how to adjust your privacy settings.

## 12. Changes to this Policy

Villa Buddha reserves the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Web Site and you are deemed to have accepted the terms of the Policy on your first use of the Web Site following the alterations.

### Schedule 1: First-Party Cookies - Strictly Necessary Cookies

Name	Used	Purpose	Typical Content	Expires
ASP.NET_SessionId	Throughout	Standard ASP.NET cookie containing the user's session ID.	Random generated number	End of the session when browser closed
AspxAutoDetectCookieSupport	Throughout Admin Area			End of the session when browser closed
GTROLES	Throughout Admin Area			End of the session when browser closed
GTFORMAUTH	Throughout Admin Area			End of the session when browser closed
promocode	Only if you arrive via a URL with a promo code	Remembers promo code so that when you register you don't have to type it in and any discounts are automatically applied.	promo code	12 months

## Schedule 2: Third-Party Cookies

Provider	Name	Used	Purpose	More Info
Google Analytics	_utma _utmb _utmc _utmz	Throughout	Used to collect information about how visitors use this site. This information is used to compile reports and to help us improve the site. The cookies collect information in an anonymous way, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.	<a href="#">Cookies &amp; Google Analytics</a> <a href="#">Google Privacy Policy</a>
Twitter	k guest_id	Blog	Latest Tweets Widget	<a href="https://twitter.com/privacy">https://twitter.com/privacy</a>