



## Old Boma ("Saruni") Privacy Policy

### Our promise to you:

- Is to hold your data securely;
- Share only where you agree;
- Use your data to arrange your travel arrangements and improve our services;
- Put you in control by allowing you to update, delete and access your data.

This policy covers how we, Old Boma Ltd., also known as 'Saruni', collect, use, disclose, transfer and store your data. We are Old Boma Ltd., also known as 'Saruni' of P.O. Box 24201, Karen, Nairobi, Kenya 00502. Our website [www.saruni.com](http://www.saruni.com) is the official travel website for our company.

Please read the following information carefully. If you book on behalf of others, you are responsible for ensuring that the others are aware of the content of this Privacy Policy and are in agreement with you supplying their personal data to use to make a booking or enquiry. By making a booking or an enquiry, you agree to the transfer, storage and processing of it as necessary. We will take all reasonable steps necessary to ensure your data is treated securely and in accordance with this Privacy Policy but if you do not agree with this policy we cannot accept your booking and, where applicable, you should not use the Saruni website.

### The personal information we collect and when and why we use it

The sort of personal data we collect will be information such as name, address, email address, telephone number, date of birth, and personal travel arrangements. In addition, we may also be required to obtain your passport details to pass to overseas authorities which require Advanced Passenger Information.

We will need to collect this information to arrange the travel and other services you are requesting. In some cases, we may also need to collect more sensitive personal data such as information concerning medical conditions, disabilities and special requirements such as dietary requests which may disclose your religious beliefs, so as to be able to consider your particular needs in relation to a booking.

### How we use this personal information

We use your personal information to:

- fulfill our contract with you and/or deal with your booking or intended booking, including processing your booking, sending you your itinerary or other details relating to your booking; update you on changes to your travel itinerary (for example, if there is a change to your booking pre travel; if a flight is delayed or cancelled);
- manage your wider travel or services requirements (for example, liaising with and transferring your data to airlines, service providers and/or travel facilitators so that they can facilitate your booking and/or your travel arrangements so any disruption can be minimised), this includes when you book a holiday package, hotel, car or other service which may be provided by us or third parties with us;
- process payments for your booking, fulfill requests for refunds and for accounting or audit purposes;
- communicate and interact with you at different times throughout your journey;
- communicate with airlines, accommodation providers and other parties that are part of your journey regarding your experience, preferences, compliments or complaints;
- improve the products and services we offer or help us to create new ones;
- market our products and services to you.

We do not generally collect special categories of personal information from you (or those you are booking for), but where we do, we seek to minimise the collection and use of it and handle it with extra care. We also share this information with third parties (who help manage our business and deliver services such as those parties who provide wheelchairs at airports) and other companies (who help manage your booking or journey), and we transfer it globally. Where you (or any passenger travelling) provides us with special categories of personal information you agree that you have voluntarily provided such information, and you consent (and the passenger travelling consents) for us to use that information for the purposes for which it was collected.

If you have any queries about any of our products or services, compliments or complaints, we will need to collect information from you, including your contact details, in order for us to respond to your query or provide you with assistance. We will collect this information when you, send us an email, call our reservations team, visit a local office, complete a website enquiry form, or contact us via another form of communication such as through social media or an online chat tool.

### **Personal information we collect and use for legal, compliance and regulatory purposes**

We process your personal information so that we can meet our legal, compliance and regulatory obligations, for legal purposes, such as to respond to a valid legal claim, summons or regulatory order, and to protect our property, rights and interests as well as the property, rights and interest of other persons.

### **Personal information we collect and use from third parties**

We collect personal information from third parties who you have authorised to provide your personal information to us (for example, this may be your travel agent or another person making a booking on your behalf, your travel companion, your travel coordinator, our promotion partners, social media and other digital website). We also collect personal information from individuals who may refer you as a friend to our products or services. We ask these individuals to confirm that you are happy to hear from us.

### **Personal information we collect and use when you are making a payment**

We collect different personal information depending on your payment method (such as credit card, bank transfer, cash). For example, for credit card payments we may collect the credit card holder name, address, card number, expiry date and CVC code.

### **Legal basis for using your personal information**

We will only collect, process use, share and store your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- we need to use your personal information to perform a contract or take steps to enter into a contract with you. For example, to manage your booking with us, to take payment for your booking, or to complete your travel arrangements;
- we need to use your personal information for our legitimate interest as a commercial organisation. For example, we may capture your interactions with our website and booking journey via tools on our website in order to identify errors or issues and ensure your customer experience meets expectations. In all such cases, we will look after your information at all times in a way that is proportionate and that respects your privacy rights;
- we need to use your personal information to comply with a relevant legal or regulatory obligation that we have.

### **Sharing your personal information with others**

We share your personal information in the manner and for the purposes described below:

- to improve the products and services we offer or help us to create new ones and for marketing and analytics as detailed below; and for the purposes described in this Privacy Policy;
- with third parties who help us manage our business and deliver our products and services. These third parties have agreed to confidentiality obligations and use any personal information we share with them or which they collect on our behalf solely for the purposes of providing the contracted service to us. These third parties include service providers who help manage our IT and back office systems, detect fraudulent transactions and security incidents; verify payments such as banks and payment card companies; provide internet services and host our facilities;
- bank and payment providers to authorise and complete payments;
- with governments, government organisations and agencies, border control agencies, regulators, law enforcement and others as permitted or required by law, in relation to API or such other legal requirements as apply from time to time when travelling to or from a particular country, and to generally comply with all applicable laws, regulations and rules, and requests of law enforcement, regulatory and other governmental agencies;
- with third parties whose products or services you are purchasing through our website or offices, or otherwise such as airlines, tourism agencies, hotel, transfer and car hire companies, tour and excursion providers or to travel agents, including if there is a problem with your booking so that your travel agent can resolve it with you.

### **Personal information we collect and use for marketing purposes and analytics**

How we use personal information to keep you up to date with our products and services.

We will only send you direct marketing, whether about us, carefully selected third parties or partners, products or services, in accordance with your marketing preferences. We may contact you by email, social media, or through other communication channels that we think you may find helpful. If at any time you would like us to stop sending you marketing material please contact us or choose the relevant "unsubscribe" option set out below.

### **How you can manage your marketing preferences**

To protect your privacy and to ensure you have control over how we manage marketing with you and provided that you have indicated that you would like to receive it:

- we will take steps to limit direct marketing to a reasonable level;
- only send you communications which we believe may be of interest or relevance to you and at all times in line with your permissions, which, as appropriate, may include telling you about developments in the products and services available through us and those of our carefully selected partners (provided that we will communicate these to you in conjunction with our own marketing);
- you can click the "unsubscribe" link that you will find at the bottom of our mailers which you receive from us, or you can unsubscribe by contacting us or changing your account settings which will remove you from the relevant marketing list.

If you do unsubscribe from marketing communications you will still receive operational and service messages from us regarding your booking including where you may not have completed a booking and responses to your enquiries made to us.

### **When and how we undertake analytics**

We aggregate personal information and remove any identifying elements in order to analyse patterns and improve our marketing and promotional efforts, to analyse website use, to improve our content and products and services, to customize our website' content, layout, products and services, and to support our

business operations. We gather certain usage information like the number and frequency of visitors to our website. This information includes which webpage you just came from, which webpage you next go to, what browser you are using, your device ID and your IP address. This collective data helps us to determine how much our customers use parts of our website, and do research on our users' demographics, interests, and behaviour to better understand and serve you. One of the ways we do this is by installing and using Cookies on your browser or device.

If you use buttons on our website linked to social media or similar sites (for example, "Like" and/or "Share" buttons), content from our Website may be sent back to those sites and, depending on your privacy settings, may be privately or publicly visible (for example, to friends, followers or generally to anyone who has access to your profile page).

### **Transferring personal information globally**

We assist you in arranging your travel within East Africa, which means your personal information is transferred and stored in other countries outside your country of residence. Some of these countries are subject to different standards of data protection than your country of residence.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable law, and we only transfer personal information to another country where:

- we are satisfied that adequate levels of protection are in place to protect your information; and
- the transfers are fully managed to protect your privacy rights and interests and are limited to countries which are recognized as providing an adequate level of legal protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights.

To this end:

- where we transfer your personal information outside our company or to third parties (who help us to provide our products and services), we obtain contractual commitments from them to protect your personal information; or
- where we receive requests for information from law enforcement or regulators, we carefully review and validate these requests before any personal information is disclosed.

In the event your personal information is transferred to a foreign jurisdiction, it may be subject to the laws of that jurisdiction and we may be required to disclose it to the courts, law enforcement or governmental authorities in those jurisdictions.

You have a right to contact us for more information about the safeguards we have put in place to ensure the adequate protection of your personal information when this is transferred as mentioned above.

### **How we protect and store your personal information**

#### **Protection of your personal information**

We have implemented and maintain appropriate technical and organisational security measures, policies and procedures designed to protect the personal information that you share with us and safeguard the privacy of such information. For example, the measures we take include placing confidentiality requirements on our staff members and service providers.

#### **Storage of your personal information**

We keep your personal information for as long as is reasonably necessary for the purposes for which it was collected. For example, to manage bookings and provide you with any relevant products or services, as

explained in this Privacy Policy. We will ensure that it is disposed of in a secure manner. In most cases we will destroy your data 7 years after collection in order to comply with UK HMRC rules. Where no booking is made, data will be removed not more than 12 months after collection.

In some circumstances we may store your personal information for longer periods of time, for example, where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements. In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

## **Cookies**

A “cookie” is a small computer file which is downloaded to your device. It collects information as to how you navigate our Website and the internet and helps us provide better website services to you.

Cookies may collect personal information about you. Cookies help us remember information about your visit to our website, like your departure point, and other settings and searches. Cookies enable us to understand who has seen which webpages and how frequently, and to determine which are the most popular areas of our website. They can also help us to operate our website more efficiently and make your next visit easier and customise your view of the website to reflect your preferences and activities. They also help us tailor our marketing and advertisements to you on our website, other website you visit, social media website and your other devices.

## **Legal rights available to help manage your privacy**

You have certain rights in relation to your personal information.

In order to exercise your rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you.

You can exercise your rights by emailing us at [marketing@saruni.com](mailto:marketing@saruni.com) or by sending us a communication to Old Boma Ltd., P.O. Box 24201 Karen, Nairobi, Kenya 00502. Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request within 30 days or inform you if we require further information in order to fulfil your request.

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

### **Right to access personal information**

You have a right to request that we provide you with a copy of your personal information that we hold and you have the right to be informed of: the source of your personal information; the purposes, legal basis and methods of processing; the data controller’s identity; and the businesses or categories of businesses to whom your personal information may be transferred.

### **Right to rectify or erase personal information**

You have a right to request that we rectify inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it.

You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful right to object ; or
- it has been processed unlawfully; or
- the personal information must be erased for compliance with a legal obligation under European Union or Member State law to which they are subject.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

### **Right to object to the processing (including direct marketing) of your personal information**

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

You can request that we stop contacting you for marketing purposes.

You can request that we not transfer your personal information to unaffiliated third parties for the purposes of direct marketing or any other purposes.

If you have joined our mailing list, you can manage your marketing preferences automatically by clicking the "unsubscribe" link that you will find at the bottom of our emails which you receive from us, or you can unsubscribe by contacting us at [marketing@saruni.com](mailto:marketing@saruni.com).

### **Right to obtain a copy of personal information safeguards used for transfers outside your jurisdiction**

You can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

We may redact data transfer agreements to protect commercial terms.

### **Right to restrict the processing of your personal information**

You can ask us to restrict your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

You have a right to lodge a complaint with the Information Commissioners Office if you have concerns about how we are processing your personal information.

If you have any concerns regarding data that we hold, please contact the Managing Director at Riccardo Orizio, Old Boma Ltd., P.O. Box 24201 Karen, Nairobi, Kenya 00502 and at [riccardo@saruni.com](mailto:riccardo@saruni.com).