

ONE OCEAN BONAIRE C.V. PRIVACY STATEMENT

Last Updated: June 1, 2018

This privacy statement ("Statement") applies to One Ocean Bonaire C.V. and its subsidiaries (collectively, "One Ocean," "we," or "us"). At One Ocean, we strive to deliver outstanding products, services, and experiences. We value your business and, more importantly, your loyalty. We recognize that privacy is an important issue. We have developed this Statement to explain our practices regarding the personal information we collect from you or about you on this site, through written or verbal communications with us, when you visit one of our properties, or from other sources. If you are a resident of the European Economic Area (EEA), please see Appendix A for additional information regarding One Ocean's use of your personal information.

By using any of our products or services and/or by agreeing to this Statement, e.g. in the context of registering for any of our products or services, you understand and acknowledge that we will collect and use personal information as described in this Statement.

Please note that this Statement does not apply to our processing of personal information on behalf of and subject to the instructions of third parties such as airlines, car rental companies and other service providers, companies that organize or offer packaged travel arrangements or marketing partners.

Click on one of the links below to jump to a specific section:

- [Personal Information We Collect](#)
- [Personal Information We Collect from Third Parties](#)
- [Use of Personal Information Collected About You](#)
- [Personal Information We Share](#)
- [Other Information](#)
- [Sensitive Information](#)
- [Personal Information From Children](#)
- [Links to Third-Party Websites and Services](#)
- [Protecting Personal Information](#)
- [Changing and Accessing Your Personal Information](#)
- [Retaining Personal Information](#)
- [Choices – Marketing Communications](#)
- [Statement Modifications](#)
- [Contact Us](#)
- [Appendix A: Additional Provisions Applicable to Processing of Personal Information of EEA Residents](#)

PERSONAL INFORMATION WE COLLECT

We collect personal information at every touch point or guest interaction, and in conducting every aspect of our business, we may collect personal information. This personal information may include: your name, mailing address, billing address, email address, phone number, information related to your reservation, stay or visit to a property; participation in a membership or loyalty program; participation in a contest, sweepstakes, or marketing program (even if you do not stay at one of our properties); information related to the purchase and receipt of products or services; nationality, passport number and date and place of issue; travel history; payment information, such as your payment card number and other card information, as well as authentication information and other billing and account details associated with billing; guest preferences; marketing and communication preferences; information about vehicles you may bring onto our properties; reviews and opinions about our properties (if they are identified or associated with you); travel partner program affiliation and member number; hotel, airline and rental car packages booked; groups with which you are associated for stays; and other types of information that you choose to provide to us or that we may obtain about you.

We may ask for details on joint travelers, including their names. We may also collect information related to conversations, and other communications such as WhatsApp messages and SMS.

In addition, we collect other personal information in certain cases, such as:

- *Surveys:* We may request demographic data or other personal information in customer surveys.
- *On-property Collection:* We collect additional personal information during registration/check-in at our properties, including such information as required by local laws. We may also use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas. We may also use closed-circuit television and other technologies that record sound or video for the protection of our staff, guests and visitors to our properties where permitted by law. In addition, we may collect personal information in connection with on-property services, such as activities and equipment rental.
- *Social Media:* If you choose to participate in One Ocean-sponsored social media activities or offerings, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. We may also allow you to enter into contests to provide photos, such as of your stay with us, which you may share with your connections on social media for votes, shared offers or other promotions.
- *Forward-to-a-Friend:* From time to time, we may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend, whether via the Internet, a stand-alone kiosk or mobile device. If you choose to use this feature, we will ask you for the recipient's name and email address, along with the text of any message you choose to include. By using this feature, you represent that you are entitled to use and provide us with the recipient's name and email address for this purpose.

In addition to the information we collect from you directly, we may also infer information about you based on the information you provide to us or from Other Information we collect.

[Back to Top](#)

PERSONAL INFORMATION WE COLLECT FROM THIRD PARTIES

We may also collect information about you from third parties, including information from your social media services consistent with your settings on such services; and from other third-party sources that are lawfully entitled to share your data with us. We use and share this information (and may append this information to the other information we have on file for you) for the purposes described in this Statement.

[Back to Top](#)

USE OF PERSONAL INFORMATION COLLECTED ABOUT YOU

We use your personal information in a number of ways, including to provide and personalize the services you request and expect from One Ocean, to offer you the expected level of hospitality in-room/-apartment and throughout our properties, conduct direct marketing and sales promotions and as set forth below in more detail. We will collect your consent prior to processing your data where required by applicable law.

We are obligated to collect certain data, including your name, address and payment information, in order to process your reservation. Failure to provide this information will result in our inability to process your reservation.

- *Marketing and Communications:* Where permitted we may use your personal information to provide or offer you newsletters, promotions and featured specials, as well as other marketing messages in accordance with any communications preferences you have expressed. We use your information to provide in-stay messaging, and reservation confirmations; to send you marketing messages; and to conduct surveys, prize draws, and other contests. We may provide these communications via email, postal mail, online advertising, social media, telephone, text message (including SMS and MMS), push notifications, WhatsApp messaging, and other means. With your consent, we also use user-generated content (such as photos) from social media services to deliver display advertising or on our website and apps.
- *Service Improvements:* We may use your personal information to improve One Ocean's services and to ensure that our site, products, and services are of interest to you. We also use your personal information to provide you with the expected level of hospitality in-room/-apartment and throughout our properties. This may include providing you with the ability to control your in-room technology through our website or apps on your personal devices.
- *Data Correctness, Analytics and Personalization:* We may aggregate your personal information with data from third-party sources for purposes of keeping information up to date and analytics. We also rely on information from third parties in order to provide better, more personalized service. For example, if you connect your social media services or other accounts to our services, we may use this information to make your experiences with us more personal and social, or share and use it as described elsewhere in this Statement.

[Back to Top](#)

PERSONAL INFORMATION WE SHARE

In order to offer you the expected level of hospitality and to provide you with the best level of service, we may share your personal information with our service providers, and other third parties as set forth in detail below:

- *On-property Services:* We may share personal information with third-party providers of on-property services such as concierge services, spa treatments, golf, or dining experiences.
- *Service Providers:* We rely on third parties to provide services and products on our behalf and may share your personal information with them as appropriate. Generally, our service providers are contractually obligated to protect your personal information and may not otherwise use or share your personal information, except as may be required by law. We may use service providers to communicate news and deliver promotional and transactional materials to you on our behalf, including personalized online and mobile advertising in accordance with your preferences and applicable law. Please see our [Cookies Statement](#) for more information. One Ocean will only work with parties that offer a method to opt-out of such advertising.
- *Other:* In addition, One Ocean may disclose personal information in order to: (i) comply with applicable laws, (ii) respond to governmental inquiries or requests from public authorities, (iii) comply with valid legal process, (iv) protect the rights, privacy, safety or property of One Ocean, site visitors, guests, employees or the public, (v) permit us to pursue available remedies or limit the damages that we may sustain, (vi) enforce our websites' terms and conditions, and (vii) respond to an emergency.

[Back to Top](#)

OTHER INFORMATION

When you visit and interact with One Ocean website, we collect other information that does not directly identify you about your use of the site, such as a catalog of the site pages you visit, and the number of visits to our sites ("Other Information"). We use Other Information, as well as data received from third parties, to deliver you email, online (on our sites and other sites) and mobile advertisements.

We use cookies and other technologies (such as "pixel tags," "web beacons," "clear GIFs", links in emails, JavaScript, device IDs assigned by Google or Apple, or similar technologies) to collect this information. If you want to remove or block Cookies from your device at any time, you can update your browser settings (consult your browser's "help" menu to learn how to remove or block Cookies). One Ocean is not responsible for your browser settings. You can find good and simple instructions on how to manage Cookies on the different types of web browsers at www.allaboutcookies.org.

Note for EEA and UK-Residents: If you are based in Europe, you also can adjust your Cookie preferences by adjusting the Cookie Settings through the Cookie Consent Manager, which can be found here: [Cookie Preferences](#).

You can learn more about interest-based advertising and how to opt out of our vendors' and other advertisers' use of Cookies to tailor content or advertising to you by visiting <http://optout.networkadvertising.org/#/> and <http://www.aboutads.info/choices>.

At this time, we do not respond to Do Not Track signals or other, similar mechanisms. Please see our [Cookies Statement](#) for more information.

We may use information we have collected and aggregated, or anonymized personal information received from third parties, to understand more about our users (for example, we may use aggregated information to calculate the percentage of our users who have a particular telephone area code). This includes demographic data, such as date of birth, gender and marital status, inferred commercial interests, such as favorite products or hobbies, and other information we may collect from you or from third parties.

Because Other Information does not personally identify you, such information may be disclosed for any purpose where permitted by law. In some instances, we may combine Other Information with personal information. If we do combine any Other Information with personal information, the combined information will be treated by us as personal information in accordance with this Statement.

[Back to Top](#)

SENSITIVE INFORMATION

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the purpose of unique identification. In some jurisdictions, mobile phone numbers, location data, and information contained on identity documents also are considered sensitive information.

We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. We may use health data provided by you to serve you better and meet your particular needs (for example, the provision of disability access).

[Back to Top](#)

PERSONAL INFORMATION FROM CHILDREN

We do not knowingly collect personal information from individuals under 18 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission.

[Back to Top](#)

LINKS TO THIRD-PARTY WEBSITES AND SERVICES

Our site may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

Your use of on-property Internet service is subject to the third-party Internet provider's terms of use and privacy policy. You can request those terms and policies by visiting the Internet provider's website: <http://www.telbo.net/customer-service.php>

[Back to Top](#)

PROTECTING PERSONAL INFORMATION

One Ocean will take reasonable measures to: (i) protect personal information from unauthorized access, disclosure, alteration or destruction, and (ii) keep personal information accurate and up-to-date as appropriate. We also seek to require our affiliates and service providers with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use reasonable technological measures to protect the personal information that you transmit to us via our site. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

Our booking engine is provided by PCI compliant software from SideMinder (<https://www.siteminder.com/pci-compliance/>). In the event of a security incident, One Ocean will notify regulators and/or consumers as required by applicable laws or regulations.

For your own privacy protection, please do not send payment card numbers or any other confidential personal information to us via email.

We will not contact you by mobile/text messaging or email to ask for your confidential personal information or payment card details. We will only ask for payment card details by telephone when you are booking a reservation or promotional package.

[Back to Top](#)

CHANGING AND ACCESSING YOUR PERSONAL INFORMATION

To the extent required by applicable law, you may be able to request that we inform you about the personal information we maintain about you and, where appropriate, withdraw your consent for certain

data processing activity and/or request that we update, correct, delete, and/or stop processing your personal information. We will make all required updates and changes within the time specified by applicable law and as required by law. Such requests may be submitted in writing to customer.privacy@oneoceanbonaire.com. To protect your confidentiality, we can only respond to such requests to the email address that you have registered or otherwise provided to us. Please remember that if you make such a request, we may not be able to provide you with the same quality and variety of services to which you are accustomed.

In addition, you may request that we cease sharing personal information about you with our business partners or that One Ocean cease using personal information about you by contacting us using the email or mailing address above. We will seek to honor those requests consistently with applicable law.

[Back to Top](#)

RETAINING PERSONAL INFORMATION

We retain personal information about you for the period necessary to fulfill the purposes outlined in this Statement, unless a longer retention period is required or permitted by applicable law. We retain personal information collected in order to fulfill guest reservations for seven years after the stay is completed. We retain other personal information for shorter periods of time if possible and if permitted by law.

We will destroy your personal information as early as practicable and in a way that the information may not be restored or reconstructed.

If printed on paper, the personal information will be destroyed in a secure manner, such as by cross-shredding or incinerating the paper documents or otherwise and, if saved in electronic form, the personal information will be destroyed by technical means to ensure the information may not be restored or reconstructed at a later time.

[Back to Top](#)

CHOICES – MARKETING COMMUNICATIONS

If you have given us your contact information (mail address, fax number, email address or phone number), we may want to inform you in accordance with any preferences you have expressed, and with your consent where required, about our products and services or invite you to events via email, online advertising, social media, WhatsApp, telephone, text message (including SMS and MMS), postal mail, our customer service call center, and other means (including on-property messaging, such as your in-room television).

If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe function in the email you receive from us or by sending a request to data.protection@oneoceanbonaire.com. Opt-out requests can take up to ten business days to be effective.

Special Notification for California Residents. Individual customers who reside in California and have provided their personal information to One Ocean may request information about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. Such requests must be submitted to us at one of the following addresses: data.protection@oneoceanbonaire.com. Within thirty days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

[Back to Top](#)

STATEMENT MODIFICATIONS

We may modify this Statement from time to time. When we make material changes to this Statement we will post a link to the revised Statement on the homepage of our site, and if you have registered for any of your products or services, we may also inform you through a communications channel that you have provided. You can tell when this Statement was last updated by looking at the date at the top of the Statement. Any changes to our Statement will become effective upon posting of the revised Statement on the site. Use of the site, any of our products and services, and/or providing consent to the updated Statement following such changes constitutes your acceptance of the revised Statement then in effect.

[Back to Top](#)

CONTACT US

If you have any questions about this Statement or how One Ocean processes your personal information, or if you wish to either provide a compliment or a complaint, please contact us by email at customer.privacy@oneoceanbonaire.com or by postal mail to One Ocean, 159 Kaya Gob. N. Debrot, Kralendijk, Caribbean Netherlands. We will respond within 30 days or sooner if practicable.

[Back to Top](#)

APPENDIX A

ADDITIONAL PROVISIONS APPLICABLE TO PROCESSING OF PERSONAL INFORMATION OF EEA RESIDENTS

For individuals residing in the EEA, this Appendix outlines certain additional information that One Ocean is obligated to provide to you, as well as certain rights you have with respect to the processing of your personal information, pursuant to applicable local laws. This Appendix will control to the extent it conflicts with any provision in the main body of this Statement.

Data Protection Officer: One Ocean's Data Protection Officer may be contacted by email at data.protection@oneoceanbonaire.com, or at the following address:

Attn: Data Protection Officer
159 Kaya Gob. N. Debrot
Kralendijk
Caribbean Netherlands

Purposes and Legal Basis for Processing: One Ocean processes your personal information for the purposes set forth in Sections 4 (Use of Personal Information Collected About You) and 5 (Personal Information We Share) of the main body of this Statement.

The legal bases for One Ocean's processing activities include processing such information as necessary to comply with our contractual obligations, compliance with our legal obligations, protecting the safety of our employees, guests and others, for our legitimate business interests, and pursuant to your consent.

The particular legal basis for the processing of your personal information is based on the purpose for which such information was provided or collected:

- *Surveys*: Completion of surveys is voluntary – we process the information obtained from surveys on the basis of your consent and in furtherance of our business interests, including marketing, service improvements, and analytics.
- *On-property Collection*:
 - When you make a reservation and when you stay at one of our properties, we process your name, address, contact information, along with the details of your stay (arrival and departure day and time, vehicle information and information regarding others traveling or staying with you), on the basis of our contractual relationship with you. We also process such data for our business interests, including for marketing, service improvements, administration, and analytics and service personalization, as described in Section 4 of our Global Privacy Statement (above).
 - We collect certain additional personal information during registration/check-in at our properties (such as national ID or passport information), as necessary to comply with our legal obligations.
 - We use closed circuit television and other security measures at our properties that may capture or record images of guests and visitors in public areas for the protection of our staff, guests and visitors to our properties.
 - We process personal information in connection with on-property services (such as concierge services, activities, and equipment rental, in order to provide the services to you and for our business interests including for marketing, service improvements, and

analytics and service personalization, as described in Section 4 of our Global Privacy Statement (above).

- *Social Media:* Participation in One Ocean-sponsored social media activities and offerings is voluntary - we process information obtained from social media participation on the basis of your consent and in furtherance of our related business interests, including for marketing, service improvements, and analytics and service personalization, as described in Section 4 of our Global Privacy Statement (above).
- *Promotions:* Participation in promotional offerings is voluntary – we process the information obtained from such participation based on your consent and as necessary to administer the offering. We also use certain data for our business purposes, including for marketing, service improvements, and analytics and service personalization, as described in Section 4 of our Global Privacy Statement (above).
- *Direct Marketing:* We use your personal information to send you marketing messages on the basis of your consent. You may withdraw your consent for direct marketing communications at any time by contacting us at customer.privacy@oneoceanbonaire.com or by following the unsubscribe instructions in the marketing message.

Retention: We retain personal information about you for the time necessary to accomplish the purpose for which such information was collected, usually for the duration of any contractual relationship and for any period thereafter as legally required or permitted by applicable law. Our retention policies reflect applicable statute of limitation periods and legal requirements.

Data Subject Rights: Residents of the EEA have the following rights:

Access, Correction and Erasure Requests: You have the right to:

- ask us to confirm whether we are processing your personal information
- receive information on how your data is processed
- obtain a copy of your personal information
- request that we update or correct your personal information
- request that we delete personal information in certain circumstances

Right to Object to Processing: You have the right to request that One Ocean cease processing of your personal information:

- for marketing activities, including profiling
- for statistical purposes
- where such processing is based on our legitimate business interests, unless we are able to demonstrate a compelling legitimate basis for such processing or we need to process your personal information for the establishment, exercise or defense of a legal claim

Right to Restrict Processing: You have the right to request that One Ocean limits the processing of your personal information:

- while One Ocean is evaluating or in the process of responding to a request by you to update or correct your personal information
- where such processing is unlawful and you do not want One Ocean to delete your data
- where One Ocean no longer requires such data, but you want us to retain the data for the establishment, exercise or defense of a legal claim
- where you have submitted an objection to processing based on our legitimate business interests, pending our response to such request
- Where we limit the processing of your personal information pursuant to your request, we will inform you prior to re-engaging in such processing.

Data Portability Requests: You have the right to request that we provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that we have obtained directly from you and only where our processing is based on consent or the performance of a contract.

Submitting Requests: your requests may be submitted in writing to data.protection@oneoceanbonaire.com, or the One Ocean Data Protection Officer, 159 Kaya Gob. N. Debrot, Kralendijk, Caribbean Netherlands. You may also update your personal information as provided in Section 12 (Changing and Accessing Your Personal Information) of the main body of this Global Privacy Statement.

We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity. We may charge you a reasonable fee for subsequent copies of data that you request.

If you have concerns about our data practices or the exercise of your rights, you may either contact One Ocean at data.protection@oneoceanbonaire.com or the supervisory authority in the Member State of your residence.

Right to Withdraw Consent: You have the right to withdraw your consent to any processing that we conduct solely based on your consent (such as sending direct marketing materials to your personal email account). You may withdraw your consent to marketing activities by following the instructions on any marketing emails, or contacting customer.privacy@oneoceanbonaire.com. For any other activities for which you have previously consented, you may contact data.protection@oneoceanbonaire.com to withdraw such consent.

Segmentation (also referred to as profiling) and Automated Decision Making: We use personal information to divide large groups of consumers into sub-groups of consumers (known as segments) based on some type of shared characteristics such as geography, behavior, or demographics.

With your consent, we make automated decisions, meaning without human interference, using segmentation and/or your specific personal information to offer you certain benefits based on your characteristics (such as discounted room rates or other special offers based on your geography, behavior, or demographics).

International Data Transfers: We may transfer the personal information we collect about you pursuant to the purposes described in this Statement to countries that have not been found by the European Commission to provide adequate protection. In particular, we transfer your personal information to Caribbean Netherlands.

[Back to Top](#)
