

DATA PROTECTION POLICY

Data Protection Policy

1. Preview

BetterBy Ltd respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and tell you about your privacy rights in relation to existing laws regulating the personal data protection.

Where individuals are engaged by an organisation, which is a client of BetterBy Ltd, and you provide us with the personal data on behalf of your employer or travel sponsor, BetterBy Ltd will process your data as required. Where travel services are purchased for you pursuant to an arrangement between your employer /travel sponsor, BetterBy Ltd as an agent, the relevant service provider will be responsible for the security of the personal data it receives and for compliance with relevant laws & regulations.

By providing personal information to us, you agree that this Notice will apply to how we handle your personal information and you consent to us collecting, using and disclosing your personal information as detailed in this Notice. If you do not agree with any part of this Notice, you must not provide your personal information to us. If you do not provide us with your personal information, or if you withdraw a consent that you have given under this Notice, this may affect our ability to provide services to you or negatively impact the services we can provide to you. For example, most travel, hotel, safari bookings, visa assistance must be made under the traveller's full name and must include contact details and appropriate identification (e.g. passport details). We cannot make bookings for you without that information.

2. Purpose

This privacy notice aims to clearly provide you with information on how BetterBy Ltd collects and processes your personal data, including any data you may provide through your employer or travel sponsor. Through this notice we also wish to inform you on how, when & why we process your personal data.

3. Data We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed and made anonymous. We may collect, use, store and transfer different kinds of personal data about you which we have listed below;

3.1. Identity Data

Identity Data includes full name, username or similar identifier, marital status, title, date of birth and gender

3.2. Contact Data

Contact Data includes billing address, delivery address, email address and telephone numbers.

3.3. Travel Data

Travel Data includes passport number, identity documents used for domestic travel and/or international travel where applicable, drivers license, loyalty programme details, biometric information

3.4. Financial Data

Financial Data includes payment card details, bank account or any data that is required to process financial transactions.

3.5. Transactional Data

Transactional Data includes details of products and services you have purchased from us including details about payments to and from you and other.

3.6. Profile Data

Profile Data includes your username and password, purchases or travel bookings made by you, preferences related to service provisions including on Airline, Hotels etc., feedback and survey responses.

3.7. Marketing & Communications Data

Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences. This will include your contact data.

3.8. Statistical Data

We also collate and share aggregated data such as statistical data for reporting purposes. Such data is derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your travel data for Management Information Reports. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this notice.

3.9. Special Category Data

We do collect special categories of Personal Data about you which includes details about your health and religion for purposes for defining services such as meal preference, visa assistance

4. How is your Personal Data Collected

We will only collect personal information in compliance with your local data protection laws. We collect your personal information from the information you submit during the course of your relationship with BetterBy. Data may be collected via email, WhatsApp, Phone Calls, In person or any other method. We will collect this information directly from you or your appointed person. We may also collect your personal information when you complete surveys or provide us with feedback, unless you choose to do so under a pseudonym or anonymously.

4.1. Direct Interactions

Direct interactions. Your employer or your travel Sponsor or you may give us your Identity, Contact and Financial Data by filling in forms electronically or by corresponding with us by post, phone, and email or otherwise.

4.2. Data Provided Via Client Contract Relationships

Personal Data provided by your company or travel sponsor for the purposes of provision of services. In all our contractual client dealings, it is explicitly stated that it is the responsibility of the client to seek authorisation for BetterBy Ltd to use the personal data to fulfil its obligations in respect of the scope of works.

BetterBy Ltd will assume this permission has been sought and given if an authorised travel request is received.

4.3. Publicly Available Sources

Identity and Contact Data from publicly available sources.

5. How We Use Your Personal Data

We only use your personal data where;

- the processing is necessary to provide our services to you,
- the processing is necessary for compliance with our legal obligations; and/or
- the processing is necessary for our legitimate interests or those of any third party recipients that receive your personal information
- providing you with services and tools you choose to use (for example, saving travel preferences online or offline);
- servicing our relationship with you by, among other things, creating and maintaining a customer profile to enable our brands to service you better or presenting options on our website we think may interest you based on your browsing and preferences;
- involving you in market research, gauging customer satisfaction and seeking feedback regarding our relationship with you and/or the service we have provided;
- to facilitate your participation in loyalty programs;
- internal accounting and administration;
- to comply with our legal obligations, including complying with law enforcement or government authority requests, and any applicable customs/immigration requirements relating to your travel;
- other purposes as authorised or required by law

5.1. Details

Where you, your company or your travel sponsor contact us in relation to a travel booking or query, the purpose for which we collect your personal information is generally to provide you with travel advice and/or to assist you with booking travel and/or travel related products and services. When you, your company or your travel sponsor book or otherwise arrange travel related products and services through us, we usually act as an agent for the relevant travel service providers (e.g. for an Airline, hotel etc.). In this case, we process your personal information as necessary so as to provide the services you requested from us. This usually includes collecting personal information about you both for our internal purposes as described in this Notice and for the travel service provider for whom we act as agent (e.g. to provide you with the booked services).

We may therefore share your information with our travel service providers such as hotel, airline, car rental, or other providers, who fulfill your travel bookings. Please note that these travel service providers also may use your personal

information as described in their respective privacy policy and may contact you as necessary to obtain additional information about you, facilitate your travel reservation, or provide you with your requested services. We encourage you to review the privacy policies of any third-party travel service providers whose products you purchase through us.

Most of the service providers have their Privacy Notices within the public domain i.e. Website, and where such Privacy Notice is not available, we will provide you with copies of all relevant travel service provider terms, conditions and privacy policies on request.

We act as agent for or on behalf of many thousands of travel service providers around the world, so it is not possible for us to set out in this Notice all of the travel service providers for whom we act or their locations.

6. Purpose For Which we will use your personal data

We have set out below, a description of all the ways we plan to use your personal data (whether on our own behalf or acting on behalf of your employer or travel sponsor), and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

6.1. Register Traveller

Name, email address, phone numbers, employer, and physical addresses, passport number, additional document information e.g. Driver License, Passport, Identity Card, Seaman Book etc., gender and date of birth. If we book travel for you or your travel companions, we may collect similar information about them. You may choose to provide additional information when setting up your traveller profile which may include request traveller credentials, and emergency contact information.

Legal Basis & Legitimate Interest: Performance of a contract with you, your employer or travel sponsor.

6.2. Book Travel Services

In addition to above, as well as the information required to build your profile we collect travel (such as arrival and departure location, airline, hotel and car rental) and other information that may be required to book your travel. Special categories of information to provide accessibility, meal preferences or other requested services.

Legal Basis & Legitimate Interest: Performance of a contract with you, your employer or travel sponsor.

6.3. Process & Deliver Services

To process and deliver your travel services;

- Manage payments, fees and charges
- Collect and recover money owed to us

In addition to above, we also collect payment card information and details necessary to process these payments.

Legal Basis & Legitimate Interest: Performance of a contract with you, your employer or travel sponsor and for legitimate interest of recovering dues owed for services rendered.

6.4. Relationship Management

Relationship management involves notifying you of changes to our terms or changes to the privacy policy or notifying you of incidents and advisory e-newsletters. Information related to Identity, Contact, Profile and Marketing & Communication data is required.

Legal Basis & Legitimate Interest: Performance of a contract with you, your employer or travel sponsor, compliance to legal & statutory obligation and our legitimate interests keep our records updated and to study/analyse on how customers use our products/services.

6.5. Participation in Survey & Competition

Data related to Identity, Contact, Profile and Marketing and Communications is required for purposes of conducting surveys or competitions.

Legal Basis & Legitimate Interest: Performance of a contract with you, your employer or travel sponsor, compliance to legal & legitimate interest to build customer relationship and grow the business.

6.6. Business Development

Data related to Identity & Contact in order to explore and seek new business opportunities.

Legal Basis & Legitimate Interest: For the legitimate purposes to grow our business and engage in marketing activities.

6.7. Statistical Data Analytics

Data related to Identity, Contact, Travel Data, Financial Data, and Transactional Data to form the aggregated data for analytical purposes.

Legal Basis & Legitimate Interest: Performance of a contract with you, your employer or travel sponsor and for the legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) grow our business and engage in marketing activities.

7. Disclosure of Personal Data

BetterBy Ltd may share your personal data with third parties for the purposes set out above. This includes service providers like airlines, hotels, tour operators, car rentals, Embassies, Visa Centres and end fulfillers of services.

It is explicit in our understanding, in law, note that if travel or associated services are purchased for you pursuant to an arrangement between your employer or travel sponsor and BetterBy Ltd then, due to BetterBy Ltd's status as an agent, the relevant service provider will be responsible for the security of the personal data it receives and for compliance with applicable law; BetterBy Ltd is not responsible for the acts or omissions of such service providers.

8. Overseas Transfer of Data

We share your personal data within BetterBy Ltd, its local Partners and to Services Providers where such international transfers are necessary for the performance of a contract between you, your company or travel sponsor. This will involve transferring your data outside the national boundaries.

Many of the Service Providers are based outside the defined national boundaries so their processing of your personal data will involve a transfer of data. Whenever we transfer your personal data overseas, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- Where we use certain service providers, who give personal data the same protection as we adhere to

It is possible that information will be transferred to an overseas recipient (other than any of our overseas related entities) located in a jurisdiction where you will not be able to seek redress under your local data protection laws and that does not have an equivalent level of data protection as in your jurisdiction. To the extent permitted by your local data protection laws, we will not be liable for how these overseas recipients handle, store and process your personal information.

9. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

9.1. Site Access Control

Prevent unauthorized persons from gaining access to data processing sites that process and use data.

9.2. System Access Control

Prevent data processing systems from being used without authorization.

9.3. Data Access Control

Ensure that persons authorized to use a data processing system have access only to the data they are authorized to access, and that data cannot be read, copied, modified, or removed without authorization during processing, use and storage.

9.4. Disclosure Control

Ascertain and check where and to whom data can be transferred by means of data transmission facilities.

9.5. Input Control

Perform checks & maintain audit logs to establish whether and by whom data has been entered, modified, or removed in data processing system.

9.6. Order Control

Ensure that personal data processed on behalf of a customer is processed in strict accordance with the customer's instructions.

9.7. Availability Control

Ensure that data is protected against accidental destruction or loss.

9.8. Notification Control

Ensure that the customer is notified promptly in the event of a material breach of any of the controls above. Any breach of confidential data is notified to customer within 72 hours of ascertaining such breach.

10. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for a period ranging from six – seven years, depending on the regulation in each country, after they cease being customers for tax purposes. In some circumstances you can ask us to anonymise your personal data after a specific period of non-use of services.

11. Your Rights

Unless withdrawn in writing, you have given your voluntary consent to BetterBy Limited to collect and process your data

You have right in relation to your personal data to:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Please note that, if you request that we restrict or stop using personal information we hold on you, or withdraw a consent you have previously given to the processing of such information, this may affect our ability to provide services to you or negatively impact

the services we can provide to you. For example, most travel bookings must be made under the traveller's full name and must include contact details and appropriate identification (e.g. passport details). We cannot make bookings for you without that information.

12.Social Media Integrations

Our websites and mobile applications may use social media features and widgets (such as "Like" and "Share" buttons/widgets) (" SM Features"). These are provided and operated by third-party companies (e.g., Facebook) and either hosted by a third-party or hosted directly on our website or mobile application. SM Features may collect information such as the page you are visiting on our website/mobile application, your IP address, and may set cookies to enable the SM Feature to function properly.

If you are logged into your account with the third-party company, then the third-party may be able to link information about your visit to and use of our website or mobile application to your social media account with them. Similarly, your interactions with the SM Features may be recorded by the third-party. In addition, the third-party company may send us information in line with their policies, such as your name, profile picture, gender, friend lists and any other information you have chosen to make available, and we may share information with the third-party company for the purposes of serving targeted marketing to you via the third-party social media platform. You can manage the sharing of information and opt out from targeted marketing via your privacy settings for the third-party social media platform.

Your interactions with these SM Features are governed by the privacy policy of the third-party company providing them. For more information about the data practices of these third-party companies, and to find out more about what personal information is collected about you and how the third-party uses such personal information, please refer to their privacy policy directly.

13.IP addresses

When you access our website, use any of our mobile applications or open electronic correspondence or communications from us, our servers may record data regarding your device and the network you are using to connect with us, including your IP address. An IP address is a series of numbers which identify your computer, and which are generally assigned when you access the internet.

We may use IP addresses for system administration, investigation of security issues and compiling anonymised data regarding usage of our website and/or mobile applications. We may also link IP addresses to other personal information we hold about you and use it for the purposes described above (e.g., to better tailor our marketing and advertising materials, provided you have opted in to receive electronic marketing).

14.Tracking Technologies / Cookies

We may use third-party web analytics services on our websites and mobile apps, such as those listed in our Cookies Policy. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our websites and apps.

For information regarding our use of cookies and tracking technologies, refer to our Cookies Policy on our website.

15. Linked Sites

Our websites may contain links to third-party websites over which we have no control. We are not responsible for the privacy practices or the content of such websites. We encourage you to read the privacy policies of any linked third-party websites you visit as their privacy policy and practices may differ from ours.

16. Contact and Acceptance

If you have any questions about how we process your personal information, please contact us through email at oliver@betterby.co.ke

The policy has been reviewed by BetterBy Limited Directors and comes into effect immediately. It could be reviewed when necessary.

It is agreed and understood, unless withdrawn in writing, you, your representative, Employer, Contractor, travel sponsor or any holder of your data have given your voluntary consent to BetterBy Limited to collect and process your data from the onset of our cordial working relationship.

BetterBy Limited

A handwritten signature in blue ink, appearing to read "Oliver", with a long horizontal stroke extending to the right.

Oliver Mascarenhas
Director