

## **1. Introduction**

1.1 We are committed to safeguarding the privacy of our website visitors.

1.2 This policy applies where we are acting as a data controller with respect to the personal data of our website visitors; in other words, where we determine the purposes and means of the processing of that personal data.

1.3 This Privacy Policy governs our data collection, processing and usage practices. It also describes your choices regarding use, access and correction of your personal information. If you do not agree with the data practices described in this Privacy Policy, you should not use the Websites or our Service.

1.4 We use cookies on our website, which you have been informed about when you first visit our website. These cookies are necessary for the provision of our website and services.

1.5 In this policy, "we", "us" and "our" refer to roombuk

## **2. How we use your personal data**

2.1 In this Section 2, we have set out:

- (a) the general categories of personal data that we may process;
- (b) the purposes for which we may process personal data; and
- (c) the legal bases of the processing.

2.2 We may process data about your use of our website ("usage data"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your website visit and product usage. The source of the usage data is Google Analytics. This usage data may be processed for the purposes of analyzing the use of the website and services.

2.3 We may process the data you fill in the form on our website. ("account data"). The account data may include your name, email address, phone number and property registration number. The source of the account data is you or your employer. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases, and communicating with you.

2.4 We may process information that you post for publication on our website or through our services ("publication data"). The publication data may be processed for the purposes of enabling such publications and administering our website and services.

2.5 We may process information contained in any inquiry you submit to us/form you fill out regarding goods and/or services ("inquiry data"). The inquiry data may be processed for the purposes of offering, marketing, and selling relevant goods and/or services to you.

2.6 We may process information relating to our customer relationships, including customer contact information ("customer relationship data"). The customer relationship data may include your name, your employer, your job title or role, your contact details, and information

contained in communications between us and you or your employer. The source of the customer relationship data is you or your employer. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications, and promoting our products and services to customers.

2.7 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions.

2.8 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("notification data"). The notification data may include your email address and name. The notification data may be processed for the purposes of sending you relevant notifications and/or newsletters.

2.9 We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.

2.10 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

2.11 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining revenue loss coverage, managing risks, or obtaining professional advice.

2.12 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.13 Please do not supply any other person's personal data to us, unless we prompt you to do so.

2.14 Our customers use our services to manage their day-to-day operations, rates, inventory, and guest information. Our customers get access to our services through a dedicated account to be logged in from a URL. roombuk does not control the content of these or the types of information that our customers may choose to collect or manage using the Subscription Service. That information belongs to them and is used, disclosed and protected by them according to their privacy policies and is not subject to this Privacy Policy. roombuk processes its customers' information as they direct and in accordance with our agreements with our customers, and we

store it on our service provider's servers, but we do not have control over its collection or management. Our agreements with our customers prohibit us from using that information, except as necessary to provide and improve the Subscription Service, as permitted by this Privacy Policy, and as required by law.

2.15 roombuk collects information under the direction of its customers and has no direct relationship with the individuals whose Personal Information it processes. If you are a customer of one of our customers and would no longer like to be contacted by one of our customers that use our Subscription Service, please contact the customer that you interact with directly. We may transfer Personal Information to companies that help us provide our service. Transfers to subsequent third parties are covered by the service agreements with our customers.

2.16 Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you. If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information). Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

### **3. Providing your personal data to others**

3.1 We may disclose your personal data to any member of our company or distributor network (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy. Information about our company can be found at: <https://roombuk.com/>

3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishing, exercising, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.3 We may disclose your name, email, phone and address to our suppliers, distributors or third-party integration companies, insofar as reasonably necessary for improving your experience with us and helping us serve you better.

3.4 Financial transactions relating to our website and services are handled by our payment services providers. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find

information about the payment services providers' privacy policies and practices on their respective websites.

3.5 We may disclose your inquiry data to one or more of those selected third-party suppliers of goods and services that we work with for the purpose of enabling them to contact you so that they can offer, market, and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the inquiry data that we supply to it; and upon contacting you, each such third party will supply you a copy of its own privacy policy, which will govern that third party's use of your personal data.

3.6 In addition to the specific disclosures of personal data set out in this Section 3, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **4. International transfers of your personal data**

4.1 In this Section 4, we provide information about the circumstances in which your personal data may be transferred to countries outside India.

4.2 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

#### **5. Retaining and deleting personal data**

5.1 Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

(a) Name, email address, IP, phone number, company information will be retained for a minimum period until you inform us of your no longer interest in our products and services, and for a maximum period of until you remain our client and use our services.

5.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of name and email address will be determined based on your interaction and communication with us.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **6. Data security**

6.1 Section 6 sets out our data security and protection procedure, which are designed to help ensure that we comply with our legal obligations in relation to the data protection regulation, data encryption, and protection from firewall, bot, DDOS or evasion attacks.

## **7. Amendments**

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of changes to this policy by email or through the private messaging system on our website.

## **8. Your rights**

8.1 In this Section 8, we have summarized the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

8.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

8.3 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

8.4 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of

expression and information; for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.

8.5 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defense of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defense of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

8.6 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defense of legal claims.

8.7 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes) or directly unsubscribe from the marketing emails that we send. If you make such an objection, we will cease to process your personal data for this purpose.

8.8 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8.9 To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

8.10 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work, or the place of the alleged infringement.

8.11 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

8.12 You may exercise any of your rights in relation to your personal data by written notice to us OR by emailing us at [info@roombuk.com](mailto:info@roombuk.com), in addition to the other methods specified in this Section 7.

## **9. About cookies**

9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## **10. Cookies that we use**

10.1 We use cookies for the following purposes:

- (a) authentication - we use cookies to identify you when you visit our website and as you navigate our website;
- (b) status - we use cookies to help us to determine if you are logged into your account/our product;
- (c) personalization - we use cookies to store information about your preferences and to personalize the website for you;
- (d) security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (e) advertising - we use cookies to help us to display advertisements that will be relevant to you;
- (f) analysis - we use cookies to help us to analyze the use and performance of our website and services; and
- (g) cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally.

## **11. Cookies used by our service providers**

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 We use Google Analytics to analyze the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our

website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

11.3 To determine your interests, Google will track your behavior on our website and on other websites, and on other websites across the web using cookies. This behavior tracking allows Google to tailor the advertisements that you see on other websites to reflect your interests (but we do not publish interest-based advertisements on our website). You can view, delete or add interest categories associated with your browser by disabling cookies. However, these opt-out mechanisms themselves use cookies, and if you clear the cookies from your browser your opt-out will not be maintained. To ensure that an opt-out is maintained in respect of a particular browser, you may wish to consider using the Google browser plug-ins available at: <https://support.google.com/ads/answer/7395996>.

## **12. Managing cookies**

12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact on the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

## **13. Our details**

13.1 This website is owned and operated by roombuk.

13.2 We are registered in Sri Lanka, and our registered office is at 54, Siripa Road, Colombo 05, Sri Lanka.

13.3 Our principal place of business is worldwide.

13.4 You can contact us:

- (a) by post, to 54, Siripa Road, Colombo 05, Sri Lanka.
- (b) <https://roombuk.com/> ;
- (c) by email, using [info@roombuk.com](mailto:info@roombuk.com)