



## PRIVACY STATEMENT

### INTRODUCTION

Elite Lifestyle Society Inc. is committed to protecting your privacy. This Privacy Statement explains how and for what purposes we use the information collected about you in connection with your use of our Concierge Service or Platform. Please read this Privacy Statement carefully.

By using our services or services provided by external Suppliers, you agree to be bound by this Privacy Statement regarding the information collected about you in connection with the Elite Lifestyle Society service.

### IF YOU DO NOT AGREE TO US COLLECTING AND USING YOUR INFORMATION, YOU MUST NOT USE ELITE LIFESTYLE SOCIETY SERVICES.

A. During your Membership, we may collect certain personal details about you, such as your name and contact information. We may also collect information about your family members or third parties when you provide details about them.

B. We collect this information about you to: provide Services to you; enable Suppliers to provide Services to you; operate our business; develop aspects of our business; personalize your preferences; contact you; and comply with the law.

C. We may determine the purposes and means of processing your personal data and act as the data controller in relation to this personal information. Furthermore: i. When you request Services from a Supplier, we may share your information with Supplier(s) who will process your data for their own purposes as data controllers and/or processors, for example, to provide specific quotes or make a booking. ii. Each Supplier is responsible for its use of your information, and Elite Lifestyle Society does not accept responsibility for such use, except when we have failed to comply with this Privacy Statement or applicable data protection laws.

Capitalized terms used without definition shall have the meanings assigned to them in the Elite Lifestyle Society Membership Terms and Conditions.

### HOW YOUR DATA IS USED

a) Any personal data we process will be handled in accordance with applicable data protection laws. Below we have outlined the purposes for processing your personal data:

b) We may use the information you provide or that we collect from you for the following purposes:

i. To provide services, allow Suppliers to offer Services, administer your membership, and manage our organization. This is necessary for the performance of our services to you. ii. To inform you about changes to our services and available offerings: I. We may use your personal data to provide information, suggestions, recommendations, products, and services that may interest you. You may be contacted via mail, email, telephone, SMS, WhatsApp, or other communication means as permitted by law. You can opt-out of this type of communication by contacting us. II. We will only contact you by email with information about products and services similar to those you've previously shown interest in or that we believe you may be interested in based on your preferences. iii. To communicate with you. We have a legitimate interest in processing personal data to respond to inquiries, requests, complaints, or feedback. iv. To administer, maintain, and improve our services:

I. We use "cookies" to track website traffic patterns and website usage, helping us understand how visitors use our website to enhance the design, layout, and functionality. Cookies will make it easier for you to use the website during future visits. A cookie is stored on your computer's hard drive, recording your navigation, and enabling tailored options upon your next visit. You can adjust your browser settings to refuse cookies, but this may impact your experience on the website. For more information on cookies, visit [www.allaboutcookies.org](http://www.allaboutcookies.org). II. We have a legitimate interest in processing user data to manage, maintain, and improve our website. v. To notify you about updates to this Privacy Statement. This is necessary for the performance of our services. vi. For internal operations such as troubleshooting, data analysis, testing, research, and statistical purposes. We have a legitimate interest in processing data for these purposes. vii. To allow participation in interactive features of our service. This processing is necessary for the performance of these services. viii. To ensure the security of our systems. We have a legitimate interest in processing user data to safeguard our systems. ix. To comply with any legal or regulatory obligations imposed on us or any relevant authorities.

c) If you have questions regarding how we use your data, please contact the Elite Lifestyle Society Data Protection Officer at [data@elitelifestylesociety.com](mailto:data@elitelifestylesociety.com)

### HOW WE LOOK AFTER YOUR DATA

We adhere to strict protocols for the storage and disclosure of your personal data to prevent unauthorized access and ensure your information remains secure.



## PRIVACY STATEMENT

### HOW WE COLLECT DATA FROM YOU

a) We may collect and process the following information in accordance with applicable data protection laws:

i) Contact Information: This includes email addresses or phone numbers provided when you first use our service or provided to validate such registration and for password reset purposes.

ii) Communications with Us: If you contact us via an online form submission with an enquiry, through telephone, SMS, WhatsApp, email, or in response to communication from us, we collect the details of these interactions. Calls may be recorded for quality control, training, fraud detection, and claims handling purposes. Recordings are kept for a limited period and automatically deleted, unless there is a legitimate reason to retain them longer, such as for fraud investigation or legal purposes.

iii) Correspondence Information: We may be provided with certain personal data such as your name, email address, and details contained in the correspondence, which may tell us something about your preferences. We need this information to respond to your enquiries.

iv) Transaction and Interaction Details: This includes details of registration, enquiries, discussions, instructions, and transactions you carry out in relation to the services via phone or email interaction with our representatives, including but not limited to: your name; subjects of interest or preferences; order details; billing information; address; type of subscription; hashed payment details; and payment acceptance status. We need this information to provide the Travel and Concierge Services.

v) Website Information: When you visit our website, we capture access data such as your IP address, browser type and version, time zone, operating system, platform, date and time of access, articles read, requests made, data transmitted, and the requesting provider. This data helps us administer, maintain, and improve our services, as well as enhance your experience on our website.

vi) Geographic Information: From your IP address, we may identify your city or country of location. This information is used to display geographically relevant content to you on our platform.

b) If you provide us with information about other individuals, you confirm that:

i) You have their consent or authorization to share this information with us.

ii) You have notified them about the collection and use of their data as outlined in this Privacy Statement.

c) We may process your personal data to comply with certain legal and regulatory requirements, including those imposed by law enforcement or regulatory agencies.

d) You are responsible for keeping your personal details up-to-date during your membership. If any information changes, please contact us to update your details.

### WHEN DO WE GIVE YOUR DATA TO OTHER PEOPLE?

a) We may share your information (including any of the data we have collected as mentioned in section 1 above) with selected third parties, including Suppliers and other entities necessary for the performance of contracts you enter into or to provide the Travel & Concierge Services to you.

b) We may also share data with:

i) Suppliers who are directly involved in fulfilling your requests.

ii) Internal Third Parties within our organization who need access to the information to perform their roles.

iii) External Third Parties who assist with our operations.

iv) Third parties to whom we may sell, transfer, or merge parts of our business or assets. In the event of a business change, such as a merger, acquisition, or asset sale, the new owners may use your personal data in the same way outlined in this Privacy Statement.

c) We require all third parties to respect the security of your personal data and comply with applicable data protection laws. We do not permit third-party service providers to use your personal data for their own purposes and only allow them to process it in accordance with our instructions for specified purposes.



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### WHERE WE STORE YOUR DATA

a) By using the Travel & Concierge Service, you acknowledge that in order to perform these services, we may need to transfer your personal data outside of your country to other locations where Elite Lifestyle Society Inc. or its Suppliers operate. These countries may not have the same data protection laws as the country where you initially provided the information. However, we will ensure that the information is protected as described in this Privacy Statement.

b) When we transfer your personal data outside of the country in which you are based, we will rely on appropriate safeguards, such as signing standard contractual clauses or adhering to applicable data protection laws in your jurisdiction.

### ACCESS TO YOUR DATA AND YOUR RIGHTS

a) As a result of our collection and processing of your personal information, you may have the following legal rights, subject to the data protection laws in your country:

i) Access: The right to request access to personal data we hold about you.

ii) Rectification: The right to request us to correct any inaccuracies or incomplete data.

iii) Erasure: The right to request the erasure of your personal data where we do not have a compelling reason to continue processing it, in certain circumstances.

iv) Data Portability: The right to receive your personal data in a structured, commonly used, and machine-readable format in certain circumstances.

v) Objection or Restriction: The right to object to or request the restriction of our processing of your personal data in certain circumstances.

vi) Automated Decisions: The right to object to, and not be subject to a decision based solely on automated processing (including profiling) that produces legal effects or significantly affects you.

vii) Withdrawal of Consent: If we process your personal data based on consent, you have the right to withdraw that consent at any time by contacting us.

viii) Complaint: The right to lodge a complaint with a data protection supervisory authority. If you need details of the data protection supervisory authority in your country, please contact us, and we will provide the relevant information.

b) To exercise any of your rights as outlined above, please contact our Data Protection Officer at [data@elitelifestylesociety.com](mailto:data@elitelifestylesociety.com)

### LINKS

a) Our correspondence with you may, from time to time, contain links to and from other websites and services, including third-party payment processors. If you follow a link to any of these websites, please note that:

i) We are not responsible for the content or reliability of any websites linked to or from our platform.

ii) We do not necessarily endorse the views expressed within linked websites, and the inclusion of a link to a website should not be seen as an endorsement.

iii) We cannot guarantee that these links will work all the time, and we have no control over the availability of the linked pages.

iv) These linked websites have their own privacy policies. We do not accept responsibility for or liability regarding these policies. Please review these privacy policies before submitting any personal data to such websites.