



medine

**MEDINE LIMITED
EXTERNAL
PRIVACY POLICY**

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1. OUR PRIVACY PROMISE

- We promise to collect, use and store your personal data in a safe and secure way.
- We promise to only use your personal data for the specific purposes stated.
- We promise to keep you informed about how we use your information and who we give it to.

This privacy notice tells you what to expect when Medine Limited (“Medine”) collects personal information about you and how we use that data, who that data may be sent to and how you can amend data you have submitted to us.

Medine is committed to protecting your personal information when you use our services. Whenever you provide such information, we will only use your information in line with all applicable data protection laws, including the EU General Data Protection Regulation (GDPR) and the Republic of Mauritius Data Protection Act 2017 (DPA). Your information will be kept in a secure environment and access to it will be restricted according to the ‘need to know’ principle.

2. OUR PRIVACY POLICY

“Personal data” means any information collected and logged in a format that allows you to be identified personally, either directly (e.g. name) or indirectly (e.g. telephone number) as a natural person.

This privacy policy forms part of the terms and conditions that govern our services. By accepting these terms and conditions, you expressly accept the provisions of this policy.

Our privacy policy applies to our website <https://www.medine.com>, and to personal information supplied over the telephone, by e-mail, fax or letter, SMS, through representatives, through online medium or channels and any other means.

This includes collecting unique online identifiers such as IP addresses, which are numbers that uniquely identify a specific computer or other network device on the internet. For more information, see our section on ‘cookies’ below.

3. WHO ARE WE?

Established in 1911 Medine Sugar Estates Company Limited has been rebranded to Medine Limited (Medine) as a private company in 2009 and is mainly domiciled in the west of Mauritius. Its registered office is situated at 4, Unicity Office Park, Rivière Noire Road, Unicity 90203, Mauritius.

Medine is now an umbrella to six businesses namely, Agriculture, Property, Education, Concorde, Tamarina and Casela.

Medine as the Management entity, shall be responsible for handling your personal information, inputted on this website and for marketing purpose. Given that the contractual relationship can primarily be with other entities of Medine, the responsibility for handling and keeping your personal information will rest on both the respective entity and Medine.

This policy applies to all data processing at Medine i.e. those operating under Medine brand name and/or any other brand owned by Medine.

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4. PRINCIPLES FOR PROTECTING YOUR PERSONAL DATA

The seven principles below are applicable within our organisation throughout the world.

(I) Transparency

When collecting and processing your personal data, we will communicate all information to you and inform you of the purpose and recipients of the data.

(II) Legitimacy

We will collect and process your personal data only for the purposes described in this Policy.

(III) Relevance and accuracy

We will only collect personal data that is necessary for data processing. We will take all reasonable steps to ensure that the personal data we hold is accurate and up to date.

(IV) Storage

We will hold your personal data for the period necessary for processing the same in compliance with the provisions of the law.

(V) Access, rectification, opposition

You may access, modify, correct or delete your personal data. You may also oppose the use of your personal data, particularly to avoid receiving sales and marketing information.

(VI) Confidentiality and security

We will ensure reasonable technical and organisational measures are in place to protect your personal data against alteration or accidental or unlawful loss, or unauthorized use, disclosure or access.

(VII) Sharing and international transfer

We may share your personal data within our organisation or with third parties (such as commercial partners and/or service providers) for the purposes set out in this Policy. We will take appropriate measures to guarantee security when sharing or transferring such data.

5. WHAT PERSONAL DATA IS COLLECTED?

At various times, we will be obliged to ask you, as our client, for information about you and/or members of your family to provide you the best of our personalised service.

- Contact details (for example; last name, first name, telephone number, address, email)
- Personal information (for example; date of birth, photo, nationality, passport, guarantor's information, marriage certificate, certificate of character)
- Information relating to your children (for example; first name, date of birth, age)
- Medical details, health reports
- Your credit card number (for transaction and reservation purposes)
- Academic certificates and CVs
- Your arrival and departure dates, visa documents, fidelity cards
- Your preferences and interests (for example; smoking or non-smoking room, type of bedding, allergies)

We do not deliberately collect sensitive information, such as information concerning race, ethnicity, political opinions, religious and philosophical beliefs, union membership, or details of health or sexual orientation or character certificate.

However, in limited cases, we might need to collect sensitive data to provide you with a better service and meet your needs, such as allergies, health conditions, current medication and/ or any physical conditions that affect your mobility. In these cases, the sensitive information will be those volunteered by you and which you have unequivocally agreed to communicate to us.

Where a reservation is made on behalf of a child who is under the age of 16 years, we shall not process the latter's Personal Information, unless express consent is given by the parent or guardian of that child. Where the reservation is made by the child's parent or guardian, we will request for relevant documentation to demonstrate a parent-child relationship. Where the reservation is not made by the child's parent or guardian, we will request for written documentation to be issued from the child's parent or guardian to signify their consent to us processing the child's Personal Information.

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6. WHEN IS PERSONAL DATA COLLECTED?

Personal data will be collected on a variety of occasions, including:

1. Activities:

- Reservation/Ticketing requests at Casela
- Reservations/Bookings at Yemen Experience
- Sale of land/properties & leasing contract (Medine Limited | Property)
- University enrolment and student accommodation (Uniciti Education Hub and SLR)
- Travel, accommodation and leisure booking (Concorde)
- Visa application (Concorde)
- Requests, complaints and/or disputes.
- Sports/Gym membership (SPARC)
- Crowdfunding (online funding)

2. Participation in marketing programs or events:

- Signing up for loyalty programs and membership schemes
- Event and Campaign management
- Online games or competitions
- Subscription to newsletters, in order to receive offers and promotions via email.
- Sponsorship request
- Social events (CSR)

3. Transmission of information from third parties:

- Tour operators, travel agencies, reservation systems, CRM, mass mailing softwares, banks or credit agencies, and others
- Agents or Contractors of Medine Limited | Property
- Profiling

4. Internet activities:

- Connection to our organisation websites (IP address, cookies)
- Online forms (web queries, online reservation, questionnaires, our organisation pages on social networks, network login devices such as Facebook login etc.).

5. Closed Circuit Television Systems and Other Security Systems:

- Closed circuit TV (CCTV) images.

7. HOW WILL MEDINE USE THE INFORMATION IT COLLECTS FROM ME?

We collect your personal data for a number of purposes including the following:

1. Meeting our obligations to our clients

2. Creation and storage of legal documents in compliance with accounting standards.

3. Improving our services, especially:

- Processing your personal data in our client marketing program in order to carry out marketing operations, promote brands and gain a better understanding of your requirements and wishes *
- Adapting our products and services to better meet your requirements
- Customising commercial offers and the promotional messages we send to you through various channels *
- Informing you of special offers and any new services created by our organisation or one of our entities *
- Managing claims/complaints

4. Managing our relationship with clients:

- Providing details for the client database
- Predicting and anticipating future behaviors
- Developing statistics and commercial scores, and carrying out reporting
- Providing context data for the offer push tool when a client visits a Medine's website
- Sending you newsletters*, promotions and offers*, or contacting you by telephone
- Managing requests to unsubscribe from newsletters, promotions and offers
- Taking into account the right to object

5. Use a trusted third party to allow us to send you promotional offers.

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6. Securing and enhancing your use of Medine websites, especially:

- Improving navigation
- Implementing security and fraud prevention.

7. Conforming to local legislation and applicable international legislation (for example, storing of accounting documents).

**(if consent given)*

8. DISCLOSURE OF PERSONAL INFORMATION

To provide you with the best-individualised service, we have to share your personal data with internal and external recipient subject to the following conditions:

(a) Within Medine, in order to offer you the best service, we can share your personal data and give access to authorised personnel, including:

- Medine employees
- IT department
- Finance department
- Internal Audit department
- Commercial partners and marketing services (if consent given)
- Medical services, if applicable
- Insurance services, if applicable
- Legal services, if applicable
- Generally, any appropriate person within Medine entities for certain specific categories of personal data.

(b) With service providers and partners: your personal data will be sent to a third party for the purposes of supplying you with services, for example:

1. External service providers:
 - Mass mailing software (if consent given)
 - Hotels, Airlines, Tour operators, Car hire agencies
 - University institutions
 - Embassy, Civil status, Notaries
 - Estate agency
 - Insurance companies
 - Customer Relationship Management (CRM) tools

- Banks
- Web developers/Advertising agencies
- Credit agencies/regulators*

(c) Local authorities: We will also be obligated to send your information to local authorities if this is required by law or as part of an inquiry and in accordance with local regulations.

Medine does not routinely disclose personal information to other organisations unless:

- Required by law.
- Use or disclosure is permitted by this policy.
- We believe it is necessary to provide you with a service or product which you have requested or are contracted to.
- To protect the rights, property or personal safety of any member of the public or a client of Medine or the interests of Medine.
- You give your consent.

9. INTERNATIONAL TRANSFERS

For the purposes set out in Clause 7 of this policy, we may transfer your personal data to internal or external recipients who may be in countries offering different levels of personal data protection in accordance with section 36 of the DPA 2017.

Consequently, in addition to the implementation of this Policy, Medine employs appropriate measures to ensure secure transfer of your personal data to a Medine entity or to an external recipient located in a country offering a different level of privacy from that proposed in the country where the personal data is collected.

As part of Medine's operation, your data will be sent to other service providers outside Mauritius and the European Union.

In addition, personal information that you submit for publication on the website will be published on the Internet and may be available, via the Internet, around the world. Medine cannot prevent the use of such information by others. By submitting your personal data, you expressly agree to these transfers, storing, processing and publishing.

However, any such transfer of information does not change any of our commitments to safeguard your privacy and the information remains subject to existing confidentiality obligations.

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10. DATA SECURITY

Medine takes appropriate technical and organisational measures, in accordance with applicable legal provisions, to protect your personal data against illicit or accidental destruction, accidental alteration or loss, and unauthorised access or disclosure. To this end, we have taken technical measures (such as firewalls) and organisational measures (such as a user ID/password system, means of physical protection etc.).

In the course of processing or transmitting your credit card CVV number Medine will observe and fully comply with best security practices.

Medine will endeavour to take all reasonable steps to keep secure any information which we hold about you, whether electronically or in hard copy, and to keep this information accurate and up to date. We also require our employees and data processors to respect the confidentiality of any personal information held by Medine.

11. COLLECTION OF OTHER INFORMATION

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

- Browser and device information
- App usage data
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you
- Aggregated information

If we are required to treat Other Information as Personal Information under applicable law, then we may use it for the required purposes and disclose Personal Information as detailed in this Policy. We and our third party service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this information to ensure that the Online Services function properly.
- **Through your use of the Apps:** When you download and use an App, we and our service providers may

track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.

- **Using cookies:** You may view our Cookie policy on our website for more information.
- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients, Facebook, etc.), measure the success of our marketing campaigns and compile statistics about usage of the Online Services and response rates. We also use Google Analytics which uses cookies and similar technologies to collect and analyse information about use of the Services and report on activities and trends. These services may collect information regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/, and opt-out by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.
- **IP Address:** Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address may be identified and logged automatically in our server log files whenever a user accesses the Online Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering the Online Services. We may also derive your approximate location from your IP address.
- **By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the Services (for example, we may aggregate Personal Information to calculate the percentage of our users who have a particular telephone area code).

12. HOW LONG WILL MEDINE KEEP MY INFORMATION?

We retain your personal data only for the period necessary for the purposes and in accordance with our Data Retention Policy and with the provisions of applicable laws.

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13. WHAT RIGHT DO I HAVE OVER MY PERSONAL INFORMATION?

Under the General Data Protection Regulation and DPA 2017, you have the right to:

- Access your personal data by making a subject access request
- Rectification, erasure or restriction of your information where this is justified
- Object to the processing of your information where this is justified
- Data portability

To be informed	An identified or identifiable individual, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual;
Access	Please send a written request if you would like confirmation that your data is being processed by us and to receive a copy of your data. We will do utmost to provide the data in a portable format.
Rectification, Erasure or Restriction of Processing	You have the right to request us to inaccuracies and complete your personal data. You can also request to erase your data where the data are no longer necessary in relation to the purpose for which the personal data was collected, you have withdrawn your consent, you have objected to processing or the data have been unlawfully processed.
To Object	<p>You have the right to object to the processing of your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of a legal claim.</p> <p>We shall stop the processing of any data, which has been obtained through your express consent upon you withdrawing such consent in writing to the Data Protection Officer.</p>
Not to be subject to automated decision-making including profiling	<p>You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or which significantly affects you.</p> <p>The above shall not apply where the decision is:</p> <ol style="list-style-type: none"> Necessary for entering into, or performing, a contract between you and Medine; Authorised by a law to which Medine is subject and which lays down suitable measures to safeguard your rights, freedoms and legitimate interests; or Based on your explicit consent.

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14. HOW TO CONTACT US?

To exercise your rights, please contact the Medine Data Protection Officer using the following contact details:

Data Protection Officer
Medine Limited.
4, Unicity Office Park,
Rivière Noire Road,
Unicity 90203
Mauritius
Email: dpo@medine.com

For the purposes of confidentiality and personal data protection, we will need to identify you in order to respond to your request. You will be asked to include a copy of an official piece of identification, such as a driver's license or passport, along with your request. In some cases, we may also request an administrative fee to cover the cost of access.

We will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to complain to the Data Protection Office under the DPA 2017 and the European Data Protection Supervisor or any supervisory authority under the GDPR.

15. UPDATES

We may modify this policy from time to time. Consequently, we recommend that you consult it regularly.

Medine operates in a dynamic business environment. Over time, aspects of our business may change as we respond to changing market conditions. This may require our policies to be reviewed and revised. Medine reserves the right to change its privacy policy at any time and notify you by posting an updated version of the policy on our website.

The amended policy will apply between us whether or not we have given you specific notice of any change.