# Introduction

**Sri Lanka Telecom PLC** ("**SLTravel,**" "we," "us," "our") has a commitment to safeguard privacy of users who visit, access, and interact with **SLTravel**, **SLTravel** Connectivity Partner Portal, Affiliate API Developer Portal on our website (via mobile and desktop), mobile app or other similar pages or means connected to the above such as contacting our support team via email, (collectively, "Site") or other similar pages or means connected to the Site (such as contacting our support team via email). This Privacy Policy for the Site (hereinafter referred to as the 'Policy') sets out SLT's commitment to privacy of the users of the Site.

This Policy is applicable for the accommodation customers who access **SLTravel** Site (hereinafter referred to as the 'Users') for the purpose of hotel booking reservations through the site.

The Users understand that the user's personal data shall be entered in to the SLT system by the Users.

Users, having read and having satisfied themselves of the Policy hereinafter recited continues to use or access the Site and such continued access shall mean User's consent to collect, store and process the User's data. Process shall mean and include but not be limited to collect, store, preserve, alter, retrieve, disclose, transmit, align, combine or carry out logical or arithmetic operations. In the event the User is not satisfied with the privacy commitment under this Policy, User shall immediately discontinue the use of service and/or access to this Site and inform SLT.

### 1. Collection of Personal Data

Users understand that it is essential for SLT to collect personal data for the purpose of creating a reservation platform to the users via the site. Users shall not provide any personal data belonging/relating to another person. SLT collect, store and process user data only for the purpose of promoting the platform of such Users on the Website as detailed hereunder. SLT may collect personal information including, but not limited to, title name, NIC, Passport, business registration number, business email address, business

address, business phone number and business title or position, gender, date of birth, email address, company name, company address, business type, business registration of the User.

### 2. Use of User Data

SLT will use User Data for the purpose of promoting the services of the platform placing of an order by customers; the completion of a transaction; financial transactions in relation to payments; audit the downloading of data from the Site; arranging for a delivery or returning of a purchase; to maintain, optimize, and set-up the Site, improve the layout and/or content of the pages of the Site and customize or to personalize them for Users; identify visitors on the Site and/or carry out research on Users' demographics. Further SLT will utilize User Data to detect and prevent any misuse, fraud, for diligence and background checks, to comply with and to respond to legal requirements setting up/administering user accounts and developing Site profiles, to monitor the user experience, for internal training (Primary Purpose).

SLT may send useful information to the Users, provided that Users have marked "I Agree to Receive Messages" Tick box displayed on the Sites for the purpose of being contacted. This would indicate the User's free, specific, informed and unambiguous consent. Subject to obtaining User consent, SLT may contact Users via email, SMS or any other consented means for the purposes of marketing advertising and promoting the Site and its new features, other products and services of SLT ( for Secondary Purposes).

## 3. Information Shared with Third Parties

In order to provide SLT services, SLT will need to share information with certain other third-parties, including service providers and our affiliates.

Users understand that, in general, the third-party providers on the Site engaged by SLT will only collect, use and disclose User Data only for the Primary Purpose under this Policy.

Unless the same is required for achieving of the Primary Purpose or by Law, SLT shall NOT sell or disclose User Data to third parties without obtaining prior consent of the User.

### 4. Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to the browser from the Website and stored on hard drive of the User devices when using this service. SLT and selected third parties of the Website use "cookies" to provide Users with a better, faster and safer user experience or to show personalized advertising.

Cookies and similar technologies may have following functions among other things:

- They may be technically necessary for the provision of the service
- They help to optimize the services (e.g. monitoring of error messages and loading times)
- They help SLT to improve User experience (e.g. save font size and form data entered)
- They allow SLT to show Users more relevant advertisements

Where possible, SLT take appropriate security measures to prevent unauthorized access of cookies and similar technologies. A unique ID ensures that only SLT and/or selected third parties have access to User Data on cookies.

## 5. Retention of Data

Users shall understand that SLT shall retain the User Data up to the period the same is necessary for the purpose/s they are being processed. However, the Users shall understand that SLT may store and retain data for archiving purposes obligatory/entitled under the law. Further, SLT shall be obliged/entitled to retain User Data without erasure or further processing in the event the same is required for evidentiary purposes or retention purposes under a written law or for a criminal investigation or judicial proceeding.

# 6. Security of Data

User Data shall be treated as confidential and be protected from unauthorized disclosure or modification.

SLT shall protect User Data through administrative, technical, physical security measures and organizational security measures. The User Data will always be treated as confidential information by SLT.

It should be noted that, Users are solely responsible for protecting their passwords and their devices against unauthorized access.

If a User attempts to change the password/User ID or update any other account information or attempt any other account activity, User may be required to enter their current password.

Users can typically end the signed in session by either signing out and/or clearing the cookies. If a User has certain browser privacy settings enabled, simply closing the browser may also end signed in session. When using a public or shared computer, User shall sign out and/or clear cookies in order to protect their account and personal User Data.

User shall be solely responsible for password protection proper sign-out and such other acts of securing their data and keep SLT indemnified of repercussions of failure to do so.

In order for SLT to safeguard the security of data, the Users shall equally contribute by using the Site in a responsible manner where the rights and information of the other Users shall be secured.

#### 7. Consent of the User

Users by accessing the **SLTravel** Site amounts to granting of the consent for the use of User Data for achieving of the Primary Purpose as detailed under this Policy.

Any use of the User Data by SLT for a Secondary Purpose as defined herein will be made with the consent of the User and an opportunity will be provided to the User to decline/withdraw such consent subsequently at any given point.

As such, in the event of SLT wishing to use User Data for any Secondary Purpose, SLT shall obtain the prior consent of the User to use, share, transfer or dispose any User Data to a third party.

For avoidance of doubt, the User understands that, once the consent is given, SLT may, from time to time, send pop-ups, alerts and messages to the User of any new product or service of SLT or any promotions of the **SLTravel** Site without further consent of the User.

## 8. Children's Privacy

This service is not intended for the use by Minors (below the age 18). SLT will not knowingly collect User Data from Users who are considered children/minors. This Policy do not permit the use of the service by children/minors.

## 9. User Rights

Users are entitled to withdraw the consent given for the collection and processing of the User Data at any time. Such withdrawal of consent will not affect any lawful collection, processing or transaction created prior to such withdrawal.

Further, the Users may request the erasure of the User Data, subject the rights of SLT under clause 10 of this Policy.

Users may, with legitimate proof of the same, request to rectify or complete any personal data, which is either inaccurate or incomplete. However, the responsibility with regard to any inaccurate User Data provided by Users shall always remain with the Users and Users shall keep SLT indemnified of any repercussions thereto.

User's may request to correct, update or remove any information that may be in SLT's records by sending an e-mail with the details of the requestor and the request, subject to SLT's rights under Clause 5.

Users shall have the right to request for a written confirmation from SLT, whether User request for rectification, completion, erasure or refraining from further processing would be granted or refused.

Users are free to disable the use of any cookies supported by the device. Users may refuse the use of cookies by selecting the appropriate settings on their browser; however, in the event of a User doing so, such User may not be able to use the full functionality of this Website.

In the event a User decides not to use cookies, SLT will not use cookies to personalize the advertisements. However, the User will continue to receive general advertisements.

# 10. Rights of SLT

SLT may with the consent of the User, use the User Data collected or processed for any Secondary Purpose other than the purpose of delivering services under the Site.

SLT may refuse to collect additional data, which are not required for purpose of delivering of services under the Site or refuse to make any changes to the collected data unless legitimate proof is provided in the process of rectifying inaccurate or incomplete User Data

SLT shall be entitled to retain User Data without erasure or further processing in the event the same is required for evidentiary purposes or retention purposes under a written law or for a criminal investigation or judicial proceeding.

SLT shall have the right to grant or refuse any request by the User for rectification, completion, erasure or refraining from further processing due to technical and operational feasibility of SLT to act on such request amongst any other reasons made available under any written law. However, SLT shall inform the User of such decision of SLT.

SLT reserves the right to impose any fees for grant of any requests made by the Users.

## 11. Exceptions to this Policy

The laws of the Democratic Socialist Republic of Sri Lanka will supersede over this Policy.

This Policy shall not be applicable in the event a User is redirected to another website/portal or a frame of another site or application which may have a link to the Site.

SLT shall not be responsible for the privacy practices or content of those third parties or

other sites and SLT encourage Users to read the privacy policies of such third parties or

sites. SLT shall not be responsible for any information provided by the Users on such

websites.

12. **Changes to this Privacy Policy** 

SLT may update this Policy from time to time in response to changes in legal, technical

or business environment. Changes to this Policy will take effect immediately upon its

posting on the Site. User can check the latest update by checking the "last updated date

and time" displayed at the bottom of this Privacy Policy.

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