

This Privacy Policy (“Policy”) applies to the use and processing of personal information collected and used by Santa Fé International Resort SA and embodies our commitment to the protection of your personal data.

This Policy puts you, the individual, in control of how your personal information is processed. We will not process your personal information in any way that is incompatible with this Policy.

By using Santa Fé International Resort SA websites and submitting your personal information you consent to the collection, use and sharing of that information as set out in this policy.

### **THIS PRIVACY POLICY PROTECTS YOUR PRIVACY BY INFORMING YOU ABOUT:**

- The types of personal information we collect about you through our websites;
- How we collect that information;
- The general purposes for which we collect such information;
- How we process that information;
- The choices and means by which individuals may limit its use and disclosure.

### **EMPOWERING YOU TO CHOOSE:**

- Whether and how certain personal information you provide is used (where such use is unrelated to the uses for which you originally disclosed it); and
- Whether and the manner in which a third party uses certain personal information you provide (where such use is unrelated to the uses for which you originally disclosed it).

### **ASSURING YOU THAT SANTA FE INTERNATIONAL RESORT:**

- Takes precautions to protect personal information from loss, misuse, unauthorized access, disclosure, alteration or destruction;
- Implements policies and procedures to ensure that personal information is kept only for the purposes for which it has been gathered;
- Uses measures to ensure that we have accurately and completely recorded the personal information you have provided; and
- Provides you access to your personal information as well as procedures for correcting or modifying that information where appropriate.

Ensuring accountability to individuals who believe that Santa Fé International Resort SA has not complied with these privacy principles.

### **INFORMATION WE COLLECT DIRECTLY FROM YOU**

We collect personal information that you have directly provided us by registering on our websites, via telephone calls, email or any other manner you have communicated information directly to us. The type of information that we may collect directly from you may include for example your name, email address, telephone number, country location, postal address, date of birth etc.

### **INFORMATION WE COLLECT WHEN YOU VISIT OUR WEBSITES AND ONLINE ADS OR PROMOTIONS**

When you visit our websites and view our online advertisements and promotions, we use cookies and other similar technologies from third party advertisers that automatically collect information about you. Examples of the type of information that we may collect through these technologies may include information about your device, your web browser, your operating system, IP address, web pages you view, links you click on and open, emails you open from Santa Fé International Resort SA etc.

### **THIRD PARTY ADVERTISING AND COOKIES**

We may place or recognize a unique “cookie” on your hard drive, and may use information (not including your name, address, email address, or telephone number) about your visits to this and other websites in order to measure advertising effectiveness and to enhance your viewing experience.

### **WHY WE COLLECT PERSONAL DATA - GETTING TO KNOW OUR CUSTOMERS**

We use information collected about you to provide you with products, offers and services that are relevant to your interests, and to show advertisements, promotions or other content that may be of interest to you.

Santa Fé International Resort SA is in the business of providing a large investment opportunities and a first class real estate service that requires more than simply offering innovative services. It requires that we understand you, our customer, and your needs.

We get to know you primarily through the information you provide to us when signing up for, or using, one or more of our services. The information you provide

ranges from basic contact information, to payment information, to the financial requirements and property details for which you are looking for.

After you have signed up for our services, we may be in communication with you about your enquiry, technical questions you may have about services provided by us, or any other matter relating to those services. These communications are essential to our relationship with you and to our ability to provide you with quality services that are responsive to your needs.

For operational and quality assurance purposes, we take note of whether and how you use the information and services that we provide, such as by recording site traffic patterns and by maintaining log files of users' access to site files.

### **THIRD PARTY ADVERTISING AND COOKIES**

We use information about you for purposes of monitoring and improving our business operations, as well as to ensure we: (i) account to you properly, (ii) administer your account in accordance with your agreements with us, and (iii) properly perform the services you have requested.

We also use the information we collect to monitor and improve our internal operations, as well as to improve the experience of users in our network of sites. For example, we may correlate website traffic information with data about individual users. This data helps us to determine how much our customers use parts of the site, allowing us to enhance it to fit the needs of as many of our customers as possible. We may also break down overall usage statistics according to customers' domain names, browser types, and MIME types by reading this information from the browser string (information contained in every user's browser).

Another example of our use of information to enhance the experience of users in our network of sites is our reliance on cookie files. We use cookie files to make it easier for users to access our site or services. A cookie file is a small data file that certain websites write to your hard drive when you visit them. A cookie file can contain information such as a user ID that the site uses to track the pages you have visited. However, the only personal information a cookie can contain is information you supply yourself. A cookie cannot read data off your hard disk or read cookie files created by other sites. We use cookies to track user traffic patterns (as described above) when you register for Santa Fé International Resort services. When you register, we may use a cookie to store a unique, random user ID. We use

this ID to identify you anonymously in our database and to track the pages you visit on our site.

If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. You may refuse cookies by turning them off in your browser; however, some of our sites may require a cookie for access.

Examples of third party advertisers and other marketing service providers who may collect your personal data may include Google – Analytics and Adwords; Social media platforms such as Facebook, Instagram, Twitter, LinkedIn, Google+; Yahoo; lead capture forms – zapier.com; email marketing providers – mailchimp.

### **WHAT WE DO WITH YOUR INFORMATION**

We are committed to making sure your information is secure and have put in place procedures to safeguard your personal data. We process and store your information in house within the Santa Fe International Resort company offices on secure servers. Your data is normally stored in the office closest to your location, governed by the information you have provided us.

### **PERSONAL DATA RETENTION**

Any personal data held by us for marketing and service update notifications will be kept by us until such time that you notify us that you no longer wish to receive this information. We will retain personal information for as long as is necessary to fulfil the purposes for which we collected it for, as outlined in this Privacy Statement, including for the purposes of satisfying any legal, accounting, or reporting requirements, unless a longer retention period is required or permitted by law.

### **WHOM WE MAY SHARE INFORMATION WITH**

We do not share your personal information with any third party companies. No third party providers have access to your data, unless specifically required by law.

### **OUR ACCOUNTABILITY TO YOU**

Santa Fé International Resort SA respects and values the security and privacy of its contacts. Santa Fé International Resort SA follows strict security procedures in the storage and disclosure of personal information in order to prevent unauthorized access. Personal Data is held on our contacts and administration database either because of work we have undertaken or are currently engaged in, or because we believe that clients may be interested in receiving material from us about our

business and services. As such we hold client contact details and the history of our client relationship. This allows us to manage our client relationships effectively and target items of interest so that you do not receive unwanted material. Should you no longer wish to receive email or other communications from us you can request this at any time by email to [privacy@santafeinternationalresort.com](mailto:privacy@santafeinternationalresort.com) or by clicking on the unsubscribe links in all of our email communications.

In addition to the privacy protections that we provide as a company, our employees are independently responsible for ensuring compliance with this Privacy Policy, as described below.

### **EMPLOYEE ACCOUNTABILITY**

Only those Santa Fé International Resort SA employees that have a legitimate business purpose for accessing and handling personal information obtained by us are given authorization to do so. The unauthorized access or use of such information by a Santa Fé International Resort SA employee is prohibited and constitutes grounds for disciplinary action. Additionally, our information management systems are configured in such a way as to block or inhibit employees from accessing information that they have no authority to access.

### **YOUR PERSONAL DATA AND YOUR RIGHTS**

Under data protection laws you have rights in relation to your personal data.

Should you believe that any personal data we hold on you is incorrect or incomplete, you have the right to request to see this information, rectify it or have it deleted. Please contact us at [privacy@santafeinternationalresort.com](mailto:privacy@santafeinternationalresort.com)

In the event that you wish to complain about how we have handled your personal data, please contact us at [privacy@santafeinternationalresort.com](mailto:privacy@santafeinternationalresort.com), and we will look into your complaint and work with you to resolve the matter.

### **NOTIFICATION OF CHANGES**

We will post any changes to this Privacy Policy 30 days before their effective date so you will always know what information we collect, how we use it, and under what circumstances, if any, we disclose it. You are responsible for periodically checking our website for changes to this Privacy Policy. Continued use of the service will signify that you agree to any such changes. You may opt out of any posted change

to our collection, use or disclosure of your personal information by sending an e-mail to [privacy@santafeinternationalresort.com](mailto:privacy@santafeinternationalresort.com). If you have any questions regarding this Privacy Policy, please contact [privacy@santafeinternationalresort.com](mailto:privacy@santafeinternationalresort.com)

## **DEFINITIONS**

In these terms and conditions:

1. “This website” means our presence on the Internet;
2. “our”, “we” and “us” means Santa Fé International Resort SA and, where applicable, its officers, employees and authorized agents; and
3. “you” and “your” refer to any individual, company or business (whether registered by us as an investor or not) to whom we provide Services by means, including but not limited to, telephone, face-to-face contact, postal correspondence, electronic mail or via our website [www.santafeinternationalresort.com](http://www.santafeinternationalresort.com) hereon referred to as the website.