

Privacy Policy

This site is owned and operated by Nature Trails Resorts Private Limited.

This Privacy Policy applies to the activities of Nature Trails Resorts Private Limited and its affiliates (referred to as "Nature Trails Resorts Private Limited", "We", "Us", or "Our" in this policy).

Because we gather certain types of information about our users, we feel you should fully understand the terms and conditions surrounding the capture and use of that information. The privacy statement discloses what information we gather and how we use it.

It explains how Nature Trails Resorts Private Limited handles personal information that users provide through voluntary submissions and complies with the requirements of the applicable laws in India.

If you have further questions relating to this policy please contact our Privacy Officer by mail at Purva Primus, 4th floor, No. 236, Okhiyampettai, Old Mahabalipuram Road, Thoraipakkam, Chennai - 600097. Board line: [+91 44 3357 3300](tel:+914433573300) or e-mail feedback@sterlingholidays.com.

COLLECTING INFORMATION ABOUT YOU (PURPOSE)

By submitting your personal data in website of Nature Trails Resorts Private Limited you explicitly consent to the use or disclosure of such personal data and information by Nature Trails Resorts Private Limited for the purposes mentioned in this policy document in compliance of applicable laws in India. Nature Trails Resorts Private Limited only collects personal information that is necessary for business purposes. We endeavour at all times to collect personal information in a fair and lawful manner, and to meet our users' expectations that we will respect their right to control how their personal information is collected and used. Nature Trails Resorts Private Limited collects personal information in many parts of its business.

These include:

- Nature Trails Resorts Private Limited Membership: Nature Trails Resorts Private Limited collects information about members at the time when a person first joins a programme and while a person is a member. The main categories of information we collect relate to a person's general contact information, personal details such as age and gender, use of the programme, payment details, responses to surveys and other details, which are usually collected directly from the member.
- Nature Trails Resorts Private Limited Resort Management: In its role of managing some resorts, Nature Trails Resorts Private Limited collects personal information related to bookings and as necessary for other purposes related to the management of the resort facility. Further personal information may be collected in specific instances such as in the event of an incident occurring on site for legal and insurance reasons.

- Nature Trails Resorts Private Limited collects information on individuals when they book their travel arrangements, in order to process the transaction and to fulfill booking requests with travel and tourism operators.

- Nature Trails Resorts Private Limited also collects general business information relating to users and other individuals.
- Consistent with the Federal Children's Online Privacy Protection Act of 1998 (COPPA), we will never knowingly request personally identifiable information from anyone under the age of 13 without requesting parental consent.
- This policy explains the main features of Nature Trails Resorts Private Limited's use of member and customer information and does not outline in detail the use of contractor and employee information.

Personal data are processed in observance of currently applicable regulations and in connection with our business as part of a survey of contact methods, or in order to process orders or your request. In addition, your data will also be used for promotional purposes, market research or to better tailor the electronic services of Nature Trails Resorts Private Limited to its customers if you have previously given us your consent at the time of provision of such data / information to Nature Trails Resorts Private Limited. Naturally, you may partially or completely revoke this consent at any time with effect for the future.

USING AND DISCLOSING YOUR PERSONAL INFORMATION

Our purpose in collecting information about you is to provide you with membership services, such as exchanging your holiday accommodation entitlements. Nature Trails Resorts Private Limited uses personal information in several different ways in operating our membership programmes and operating our business, and most of these uses are clear from the circumstances. We also use your personal information for internal quality assurance purposes.

Nature Trails Resorts Private Limited provides personal information to resort operators in order to facilitate a booking that you have requested. Otherwise Nature Trails Resorts Private Limited does not routinely disclose personal information, except where it is necessary to provide you with a service that you have requested such as to make bookings for your travel with airlines.

The information provided by you is also used for our business transactions with you and for our legitimate business interest.

We use your information including personal data in accordance with any consent you may have provided. You have the right to decline to provide your consent and, if consent is provided, to withdraw your consent at any time.

Subject to applicable laws and consent provided by you, we may disclose your information to our affiliates, vendors and service providers, business partners and other third parties, for the purpose of our business or for our business transactions with you or for ensuring appropriate effective services to our members, customers and clients.

Nature Trails Resorts Private Limited will not normally otherwise use or disclose any information about you without your consent, unless it is:

- Required by law or in compliance with any legal process
- To respond to request from public and government authorities

- To protect our operations or those of any of our affiliates or other third parties

- To protect the rights, property or personal safety of another Nature Trails Resorts Private Limited member, any member of the public
- The assets and operations of the business are transferred to another party as a going concern
- When you provide your personal information to us, Nature Trails Resorts Private Limited will give you the choice as to whether or not you wish to receive further information about special offers, promotions, and changes to our products and services. If you indicate that you do not wish to receive these, we will not contact you further for these purposes. Please allow 28 days for your request to be processed
- To enforce our terms and conditions
- To allow us to pursue available remedies or limit damages we, our affiliates, or other third parties, may sustain.

In respect of information provided by you and consent given by you to us for processing of the same, you shall have the right to withdraw your consent, access your information, correct your information, delete your information or object to / restrict processing of such information, all by appropriately contacting us through the contact details provided in the website.

SERVICE PROVIDERS

Like many businesses, Nature Trails Resorts Private Limited uses a range of service providers to help us maximise the quality and efficiency of our services and our business operations. This means that individuals and organisations outside of Nature Trails Resorts Private Limited, such as mail houses, will sometimes have access to personal information held by Nature Trails Resorts Private Limited and may use it on behalf of Nature Trails Resorts Private Limited. We require our service providers to adhere to strict privacy guidelines and not to keep this information or use it for any unauthorised purposes.

Nature Trails Resorts Private Limited AND MARKETING ACTIVITIES

Nature Trails Resorts Private Limited manages communications with members, prospective members and customers according to its privacy policy. We respect individual's choices about being contacted for marketing purposes. We may occasionally contact you at the e-mail or other address that you provide to us in order to:

1. Remind you of your membership benefits and other details
2. Provide you with updated information about our services or special promotions
3. Provide you with other information about other products and services which you may have an interest in

Some of this information is necessary as part of our communication about the Nature Trails Resorts Private Limited programme and is sent to all users. However, if you are receiving promotional information from Nature Trails Resorts Private Limited and do not wish to receive this information any longer, you may remove your name from our list

either by mailing us at Purva Primus, 4th floor, No. 236, Okhiyampettai, Old Mahabalipuram Road, Thoraipakkam, Chennai - 600097. Board

line: [+91 44 3357 3300](tel:+914433573300), India or e-mail feedback@sterlingholidays.com and asking to be removed from our mailing list. Please allow 28 days for this request to be processed.

FOR OUR WEBSITE USER

Nature Trails Resorts Private Limited is committed to high standards of data security with respect to information collected on our site. We offer SSL encryption, the industry standard security measures for transactions made over the Internet.

New technologies are emerging on the Internet that help us deliver customised visitor experiences. At Nature Trails Resorts Private Limited, we primarily use "cookies" to help us determine which service and support information is appropriate for your computer and to facilitate your use of our instant transactions area. Our use of this technology does not mean that we automatically collect additional information about you. We might be able to ascertain what type of computer you are using, but beyond that, our use of cookies is designed only to provide you with a better experience when using our websites. As you know a cookie is a small file that is stored on your computer when you visit a website. If you visit the website again, the cookie shows that it is a repeat visit. The cookie does not contain any personal information, and it cannot be used to identify you on third-party websites, including the websites of the analysis provider. Furthermore, cookies can be used to store your preferred settings, e.g. language and country settings, so that these are available immediately on your next visit. We do not use IP addresses or cookies to personally identify you. We use the web analytics system in order to increase the efficiency of our site. Nature Trails Resorts Private Limited uses industry standard tools and practices like Google Analytics, Adwords, Affiliate Networks and Social Media Platforms to interact with the customer and measure their behavior on our digital platforms.

Users can also voluntarily subscribe to newsletters, offers and any official information via website, email, social media and other channel partners.

Nature Trails Resorts Private Limited assumes full responsibility of its customer information in digital and non-digital formats

Nature Trails Resorts Private Limited does not disclose/leak or share its customer information to un-authorized agencies.

We want to be sure you understand that accepting a cookie in no way gives us access to your computer or any personal information about you.

Website tracking method used by Nature Trails Resorts Private Limited

We use Google Analytics to help us get a better understanding of how visitors use this website and to facilitate interest based advertising associated with your Google Account and other devices you use. The information generated by the Google Analytics cookie about your use of this website is transmitted to and stored by Google. If you do not want your activity on this website to be tracked by Google Analytics, you may opt out by using the link <http://tools.google.com/dlpage/gaoptout?hl=en>

For more information about these new technologies on our websites please contact our Privacy Officer by mailing us at Purva Primus, 4th floor, No. 236, Okhiyampettai, Old Mahabalipuram Road, Thoraipakkam, Chennai - 600097. Board line: [+91 44 3357 3300](tel:+914433573300), India or e-mail feedback@sterlingholidays.com

Newsletter

Should you wish to receive the newsletter offered on the website, we require a valid email address and information that allows us to verify that you are the owner of the email address and that the owner agrees to receive the newsletter.

You may, at any time, revoke your consent to the storage of the data, the email address as well as their use for sending the newsletter.

Security

Nature Trails Resorts Private Limited stores and operates all the information of website and customer data in a webserver which is transmitted via sha256RSA encrypted https protocol. Nature Trails Resorts Private Limited also runs redundant server to avoid loss of info/data. Nature Trails Resorts Private Limited takes responsibility of the information/identity security on the owned digital properties. In case of external websites and digital properties users should refer to the privacy policy of the respective external website and public platforms.

Blog

Your email address is required to subscribe to our blog and is stored exclusively for communication purposes. The address is not used for other services.

If you have any questions about Nature Trails Resorts Private Limited blogs, please contact us at:

feedback@sterlingholidays.com

Third Party Information:

To optimise the information we provide to you, you will also find links on our website which refer to third-party websites. Where this is not obviously recognisable, we point out that this is an external link. Nature Trails Resorts Private Limited has no influence on the measures taken thereon to protect your personal data. Nature Trails Resorts Private Limited asks that you refer to the respective privacy policies there. Consequently, the warranties of this privacy policy naturally do not apply to these third-party sites.

From time to time, Nature Trails Resorts Private Limited may offer a feature that allows you to send an electronic postcard or otherwise share a message with a friend, relative or any other person known to you, whether via the Internet, a stand-alone kiosk or mobile device. If you choose to use this feature, we may ask you for the recipient's name and email address, along with the text of any message you choose to include. By using this feature, you represent that you are entitled to use and provide us with the recipient's name and email address for this purpose.

Further, we may receive your personal information from other sources, such as public databases, joint marketing partners, data firms, social media platforms, from people

with whom you are friends or otherwise connected on social media platforms, as well as from other third parties. For example, if you elect to connect your social media account

to your website account, certain personal information from your social media account will be shared with us, which may include personal information that is part of your public profile or your friends' public profiles.

Sensitive Personal Data:

The term "sensitive personal data" refers to information related to your sex life, sexual orientation, biometric data, genetic data, transgender status, intersex status, caste or tribe, religious or political belief or affiliation; or any other category of data specified by applicable statutes. We do not generally collect such sensitive personal data and you are not supposed to disclose the same, unless it is volunteered by you.

YOU CAN ACCESS THE INFORMATION WE KEEP ABOUT YOU

You always have the right to receive information regarding your stored personal data, as well as regarding the purpose of the associated data processing. Information about stored data may be obtained from Nature Trails Resorts Private Limited.

If at any time you want to know exactly what personal information we hold about you, you are welcome to access it. Any further additional details that we may hold about you can be requested by mailing us at Purva Primus, 4th floor, No. 236, Okhiyampettai, Old Mahabalipuram Road, Thoraipakkam, Chennai - 600097. Board line: +91 44 3357 3300, India or e-mail feedback@sterlingholidays.com. Our file of your information will usually be made available to you within 14 days. For security purposes, confirmation of your identity will be required prior to supply of this information.

CHANGING AND DELETING THE INFORMATION WE HAVE ABOUT YOU

If at any time you wish to change personal information that is inaccurate or out of date, please contact us through the contact details provided in the website and we will amend this record. If you wish to have your personal information deleted, please let us know in the same manner as referred to above and we will take all reasonable steps to delete it unless we need to keep it for legal reasons.

STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

Nature Trails Resorts Private Limited endeavours to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate and up to date. Nature Trails Resorts Private Limited uses a sophisticated computer data network, and all access to the computers and system devices are password controlled. Employees can only gain access to data if they are authorised, and we maintain an audit log which records each time a file is accessed. We also require our employees and data processors to respect the confidentiality of any personal information held by Nature Trails Resorts Private Limited.

Data is secured in a secure data centre environment, with daily backups of all data taken and a copy of all data kept offsite. Our data network is totally private and not accessible over the Internet. We use sophisticated detection and intrusion technologies to ensure that there are no network security breaches.

STORAGE OF PERSONAL INFORMATION OVERSEAS

Please note also that as a global business, Nature Trails Resorts Private Limited may use overseas facilities to process or back up the information that it holds. As a result, we may store your personal information to our overseas facilities for storage. However, we will only store information overseas as authorized by the Privacy Act and in keeping with our other commitments to safeguard your privacy.

We do not export data to unauthorized servers. We may sign up with tools, platforms, social media services, servers etc. and store information in the account owned by us also adhering to the privacy policies of the service providers.

WHAT TO DO IF YOU HAVE A PROBLEM OR QUESTION

If Nature Trails Resorts Private Limited becomes aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our Privacy Policy, or you have a problem or complaint, please contact us by mailing at Purva Primus, 4th floor, No. 236, Okhiyampettai, Old Mahabalipuram Road, Thoraipakkam, Chennai - 600097. Board line: [+91 44 3357 3300](tel:+914433573300), India or e-mail feedback@sterlingholidays.com

CONSENT

By using this site you consent to the collection and use of this information by Nature Trails Resorts Private Limited

FUTURE CHANGES

Our commitment to being a leading holiday company and to continually improve our services means that our business will continue to evolve as we respond to customer needs. Because of this, from time to time, our policies will be reviewed and may be revised. Changes to Nature Trails Resorts Private Limited's Privacy Policy will be made by posting an updated version of the policy on our website and communicated subsequently in our publications to our members.

Legal Disclaimer

I. PREAMBLE:

Use of this site constitutes agreement with the following terms and conditions:

Sterling Holiday Resorts Limited (herein after referred to as Nature Trails Resorts Private Limited) maintains this web site (the "Site"). Please read these Terms of Use carefully before using this Site. By using this Site you agree to comply with and be

bound by these Terms of Use. If you do not agree to these terms, you must not use this Site.

You agree to the terms and conditions outlined in this Terms of Use Agreement ("Agreement") with respect to our Site. This Agreement constitutes the entire and only agreement between us and you with respect to the Site, and supersedes all prior or contemporaneous agreements, representations, warranties and understandings with respect to the Site, the content, products or services provided by or through the Site, and the subject matter of this Agreement. This Agreement may be amended at any time by us from time to time without specific notice to you. The latest Agreement will be posted on the Site, and you must review this Agreement prior to using the Site.

Nature Trails Resorts Private Limited is pleased to allow you to visit the site, print or download any content, graphic, form or document from the Site for your personal, non-commercial use without any right to sell, redistribute, change or delete any such material. You may not modify the materials at this Site in any way or repost, republish, reproduce, publicly display, perform, assign, sublicense or prepare derivative works of or otherwise use the materials for any purpose except as expressly permitted under this Agreement. Copyright of the materials at this Site is owned by or used with permission Nature Trails Resorts Private Limited and any unauthorised use of any materials at this Site may violate copyright, trade mark and other proprietary (including but not limited to intellectual property) legal rights of Nature Trails Resorts Private Limited.

As a user of this Site you are granted a nonexclusive, nontransferable, revocable, limited license to access and use this website, digital properties and content in accordance with these Terms of Use. Nature Trails Resorts Private Limited may terminate this license at any time for any reason.

We reserve the right in our sole discretion to edit or delete any documents, information or other content appearing on the Site.

II. DISCLAIMERS:

Anonymous data collection

In general, you can visit the pages of Nature Trails Resorts Private Limited website without being requested by us to provide any of your personal data.

Nature Trails Resorts Private Limited automatically collects and stores log files information that your browser transmits to it. This information includes:

- Browser type/version
- Operating system used
- Referrer URL (the page that refers you to www.sterlingholidays.com)
- Hostname of the accessing computer (IP address)
- Time of the server request
- Other information

The information, materials and services provided at and accessible through this site are provided "as is", "as available" and, to the maximum extent permitted by applicable law, Nature Trails Resorts Private Limited specifically does not make any warranties or representations as to the accuracy or completeness of any such materials. Nature Trails Resorts Private Limited periodically adds changes, improves or updates the materials on this site without any notice. Under no circumstances shall Nature Trails Resorts Private Limited be liable for any loss, damage, liability or expenses incurred or suffered which is claimed to have resulted from the use of this site, including without limitation, any fault, error, omission, interruption or delay with respect thereto. Use of this site is at user's sole risk.

User specifically acknowledges and agrees that Nature Trails Resorts Private Limited is not liable for any conduct of any user.

The internet site introduces products and services and discloses product / service information at the discretion of Nature Trails Resorts Private Limited. Presentation of this information does not create any warranties or guarantees of any kind.

Nature Trails Resorts Private Limited is neither liable for nor warrants or guarantees the accuracy or completeness of the information available on its digital properties, or that the information is up-to-date. Nature Trails Resorts Private Limited is neither liable for nor warrants or guarantees the accuracy or completeness of the information available on its internet site or all direct or indirect links on or from the internet site, or that such information is up-to-date. Nature Trails Resorts Private Limited does not warrant that the information provided through direct or indirect links does not infringe the rights, including without limitation, intellectual property rights, of any third parties. Nature Trails Resorts Private Limited is not liable for any errors or omissions occurring on any linked sites made by creators and/or publishers of those sites. The appearance of links does not constitute an endorsement, sponsorship, affiliation or recommendation by Nature Trails Resorts Private Limited.

Nature Trails Resorts Private Limited fully disclaims and is not at all liable for any direct or indirect damages; including lost profits, special, incidental or consequential, of every kind and nature, known and unknown, suspected or unsuspected, disclosed and undisclosed, arising out of or in connection with the information available on the internet site. Further this site may contain advice, opinions and statements of various information providers and content providers. Nature Trails Resorts Private Limited does not represent or endorse the accuracy or reliability of any advice, in no event shall Nature Trails Resorts Private Limited be liable whatsoever for your use of any information, materials or services provided at or accessible through this site. In particular, but not as a limitation thereof, Nature Trails Resorts Private Limited is not liable for any loss or damage whether direct, indirect, special, incidental or consequential (including damage for loss of business, loss of profits, litigation, or the like), whether or not reasonably foreseeable and even if Nature Trails Resorts Private Limited has been advised of the possibility of such loss or damages and regardless of the form of action, whether in contract, tort (including negligence), strict liability, arising under statute or otherwise. The negations of loss or damages set forth above are fundamental elements of the basis of the bargain between Nature Trails Resorts Private Limited and you. This site and the information would not be provided without such limitations.

As a condition of use of this site, User agrees to indemnify Nature Trails Resorts Private Limited and its affiliates from any and all actions, claims, losses, damages, liabilities and expenses arising out of User's use of this site, including without limitation any claims alleging facts that if true would constitute a breach by user of these terms and conditions. If User is dissatisfied

with any material on this site or with any of terms and conditions of use of this site, user's role and exclusive remedy is to discontinue using this site.

Nature Trails Resorts Private Limited reserves the right to make changes or alterations to the information available on the internet site without any prior notice.

The facility for online payment(s) through credit card/ net banking account(s) is available for select credit card and net banking account(s) only.

When making any online payment(s) through your credit card/ net banking account(s), you will be redirected to the payment gateway page. The payment gateway will redirect you to other website(s) maintained or controlled by third party(ies) (the "non-Nature Trails Resorts Private Limited website(s)"). Nature Trails Resorts Private Limited does not control the non-Nature Trails Resorts Private Limited digital properties and is not responsible for any transactions on the non-Nature Trails Resorts Private Limited digital properties. Nature Trails Resorts Private Limited is not responsible for, shall have no liability for and disclaims all warranties whatsoever expressed or implied related to the non-Nature Trails Resorts Private Limited digital properties, including without limitation any warranties related to performance, security, stability, or non-infringement of the title of the non-Nature Trails Resorts Private Limited digital properties, content or any controls downloaded from the non-Nature Trails Resorts Private Limited digital properties.

You are requested to only use the Nature Trails Resorts Private Limited transaction ID for all queries made to the Nature Trails Resorts Private Limited Customer Services helpline regarding online payment(s) made through your credit card/ net banking account(s).

III. LINKS TO OTHER WEB SITES:

The Site contains links to third-party websites. The link sites are not under control of Nature Trails Resorts Private Limited. Nature Trails Resorts Private Limited is not responsible for the content; accuracy or opinions expressed in such websites, and such websites are not investigated, monitored or checked for accuracy or completeness by us. Inclusion of any linked website on our Site does not imply approval or endorsement of the linked websites by us. If you decide to use these links, you will be leaving our Site and accessing these third-party sites, and you do so at your own risk. Nature Trails Resorts Private Limited does not make any representations about third-party websites; or information, products or materials found there; or any results that may be obtained from using them.

IV. SEVERABILITY:

If any provision of this Agreement is found invalid or unenforceable, that provision will be enforced to the maximum extent permissible, and the other provisions of this Agreement will remain in force.

V. COPYRIGHT / TRADEMARKS:

All material available on this web site is protected by copyright laws. Distribution of the material from the Site, for commercial purposes is prohibited. Domestic and International copyright and Trademark laws protect the entire contents of the Site. You are expressly prohibited from modifying, copying, reproducing, republishing, uploading, posting, transmitting or distributing any material on this Site including text, graphics, code and/or software. Similarly, trademarks, trade names, logos, etc., posted in the web site are also subject to appropriate protection under the applicable laws and the same cannot be used by any third party without prior written consent of Nature Trails Resorts Private Limited or the owner of such trademarks, trade names, logos, etc., in case the same are belonging to any other party other than Nature Trails Resorts Private Limited.

All legally copy protected information, including but not limited to product / service designations, logos and company designations mentioned on the web site of Nature Trails Resorts Private Limited, are appropriately labelled.

VI. APPLICABLE LAW AND JURISDICTION:

This Site is administered by Nature Trails Resorts Private Limited at its offices in India and this agreement will be interpreted and enforced in accordance with laws of India. Any action to enforce this policy document or to resolve any dispute or conflict in any manner connected to this agreement, shall be brought exclusively in a court of competent jurisdiction in Chennai, India alone. You agree to submit to such exclusive jurisdiction of the courts at Chennai, India in relation to any conflict, controversy, dispute, etc., under or relating to or arising out of, this policy document including usage of Nature Trails Resorts Private Limited website.

VII. GENERAL:

Nature Trails Resorts Private Limited reserves its exclusive right in its sole discretion to modify, alter, change or otherwise amend the above Privacy Policy and also limit or discontinue the site or any materials as contained therein, in any respect. Nature Trails Resorts Private Limited shall have no obligation to take the consent or needs of any user into consideration in connection therewith.

Important:

Notwithstanding anything contained in the above Privacy Policy, Nature Trails Resorts Private Limited commits that it will comply with all applicable legal and statutory provisions in India being in force in respect of privacy, personal data, etc., including the provisions of the Personal Data Protection Bill, 2018 when it becomes a law. In this regard if necessary the required changes will be made in the Privacy Policy.