

1. OVERVIEW

Newmark Hotels (Pty) Ltd ("Newmark") and the entities under its management (see Annexure A) is committed to providing distinctive hotels, lodges, reserves, apartments and unique experiences for our guests. Consistent with that commitment, we are respectful of the privacy of the personal information that we process in order to provide and offer services. Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements. This Privacy Policy describes how we collect, use, safeguard and share information received through this Site and in the course of our business as well as your choices regarding your personal information. As one of our guests and/or a visitor to our Site you understand and agree that we may collect, use and share your personal information in accordance with this Privacy Policy and the Terms and Conditions.

2. APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy pertains to the personal information that we collect or receive regarding our guests, other individuals and visitors to www.newmarkhotels.com website (the "Site"), owned and operated by Newmark. Please review this Privacy Policy carefully to understand our commitment to your privacy.

3. PERSONAL INFORMATION WE COLLECT

Our Site collects personal information that you voluntarily submit. We also automatically collect Site usage and other statistical information from visitors to our Site.

3.1 Personal Information You Provide

3.1.1 When using our Site, you have the ability to voluntarily provide certain information about yourself or others, such as when you create an account, book a reservation or participate in an online promotion. You can use our Site anonymously without creating an account, but you will need to create an account if you want to take advantage of promotions or certain time saving features.

3.1.2 Personal information that you may provide through this Site about yourself and those traveling with you includes:

3.1.2.1 Name, gender, nationality, date and place of birth, travel information, passport and visa information;

- 3.1.2.2 Contact information, such as a home or business address, telephone number and email address;
- 3.1.2.3 Information that allows us to provide specialized services to you or fulfil special requests, such as accommodating health or dietary conditions, but we do not collect sensitive information about you, such as health information, except as reasonably needed for us to provide services to you.
- 3.1.2.4 Credit card or payment card number, billing address, expiration date and security code;
- 3.1.2.5 Account login credentials, such as usernames and passwords, password hints and similar security information;
- 3.1.2.6 Eligibility information such as name, age and contact information when participating in a competition; and
- 3.1.2.7 Preferences for receiving communications from us or in the course of participating in surveys or promotional offerings.
- 3.1.2.8 Interests and communication preferences, including preferred language.

3.2 Automatically Collected Information

- 3.2.1 Our Site is engineered to collect statistical information about those using it to ensure a welcoming and accessible Site. For this purpose we may track your movement within the Site, the pages from which you were referred, access times and browser types. To gauge the effectiveness of our Site, we do collect some generic information about our visitors. Our web servers recognize and automatically log a visitor's domain name, the web page from which a visitor enters our Site, which pages a visitor visits on our Site, how much time a visitor spends on each page, and the visitor's IP address.
- 3.2.2 We may use anonymous tracking technologies to collect, store and sometimes track information for statistical purposes and to improve the services we provide, including using it to evaluate and improve our Site.
- 3.2.3 We also collect and store information automatically using cookies and similar technology as described below.

3.3 Data From Other Sources:

- 3.3.1 We also may obtain contact details and other information about you from our affiliates and from other third parties, including:

- 3.3.1.1 Social networks when you grant permission to the Service to access your data on one or more networks;
- 3.3.1.2 Service providers that help us determine a location in order to customise certain products to your location;
- 3.3.1.3 Businesses with which we offer co-branded services or engage in joint marketing activities; and/or
- 3.3.1.4 Publicly-available sources and data suppliers from which we obtain data to validate or supplement the information we hold.

4. HOW WE USE YOUR INFORMATION

- 4.1** We may use personal information you submit and non-personal information we automatically collect for the purposes identified in this Privacy Policy for our general business use, including, for example:
 - 4.1.1** Processing, fulfilling and recording reservations and/or purchases;
 - 4.1.2** Billing your credit card for advance purchase reservations and advance deposits;
 - 4.1.3** Contacting you for confirmation or customer service after reservations and purchases are made or after you sign up for or participate in certain activities;
 - 4.1.4** Conducting statistical or demographic analysis;
 - 4.1.5** Tracking reservations and corresponding resort stays;
 - 4.1.6** Sending you emails that relate to a resort stay;
 - 4.1.7** Sending you via postal mail or email, communications such as guest surveys or promotional offers and benefits;
 - 4.1.8** Communicating special offers and featured items to you, if you choose to receive such notices;
 - 4.1.9** Responding to your inquiries, complaints and other communications;
 - 4.1.10** Providing for the safety and security of our guests and staff and meeting our legal and regulatory compliance requirements; and

4.1.11 Use of your public Content that is uploaded onto our website ("Newmark Hotels Website") from third party websites such as Twitter, Facebook and Instagram.

5. COOKIES

5.1 We collect and store information through cookies, log files, clear gifs, and/or third-party sources to maintain and improve the functionality of our site. A cookie is a small text file that is stored on a user's computer for record-keeping purposes. It may identify the device you use to access our Site, but it does not collect personal information about you. We do not use technology that recognizes a "do-not-track" signal from your web browser.

6. ACCESSING, UPDATING OR DELETING YOUR PERSONAL INFORMATION

If you wish to access or update your personal information or if you wish to delete your profile entirely, please send us a written request either by post or email to the addresses as set out in our How to Contact Us section below. If you wish us to cancel, and/or stop the processing of your personal information we will, subject to our discretion, cancel and/or stop the processing of the personal information. We will not delete personal information that we are required to retain for our business operations or legal compliance. We may require that you provide adequate identification information or documentation before providing your personal information that we hold; this is for your protection. We will respond to your requests within 20 days of receipt and authentication.

7. DISCLOSING YOUR INFORMATION

We may disclose your personal and non-personal information from time to time as permitted by law and this Privacy Policy. We do not share your information with third parties for their use in direct marketing unless we have your permission. We may share your personal information with travel agencies and loyalty programmes or if you request or authorize us to do so. Otherwise we may disclose your information only as follows:

7.1 Aggregated Information

We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics, to our affiliates and third parties without restriction.

7.2 Among our Affiliated Companies

Your personal information and non-personal information may be shared for any purpose among our group companies. Each of our companies subscribes to this Privacy Policy and will treat your information in accordance with this Policy.

7.3 Completing Your Transactions

We may share your personal information with third parties in order to complete a transaction that you have requested. This may include payment processing, obtaining approval for credit offered to you, or fulfilling your requests for services or products.

7.4 Service Providers and Agents

We may share your personal information with service providers, contractors, agents, outside vendors or service providers to perform functions on our behalf. This may include analysing data, providing marketing assistance, providing customer service, processing orders, facilitating communications with you, or enhancing your experiences when you stay with us.

7.5 Legal Requirements

We may disclose your personal information to comply with the law, applicable regulations, governmental and quasi-governmental requests, court orders or subpoenas, to enforce our Terms of Use or other agreements, or to protect our rights, property or safety or the rights, property or safety of our users or others.

8. DATA PROCESSING AND CROSS-BORDER DATA TRANSFERS

8.1 Our Site is maintained on servers located in South Africa, and personal information submitted through our Site is stored on servers located in South Africa. Personal information submitted through our Site in connection with a booking is provided to the applicable resort. Personal information submitted

in connection with your stay at any Newmark Hotels' property is stored by our resort locally and also transferred to servers located in South Africa. Personal information is transferred to our computers in South Africa to facilitate aggregated trend analysis used for resort management purposes such as planning new resort locations, evaluate resort amenities and guest preferences, and for advertisement planning. In relation to personal information collected relating to South Africa which does not have existing data protection legislation, such data is covered by the Privacy Policy and other procedures which are designed to ensure an adequate level of protection.

8.2 While we will take steps reasonably necessary to ensure your personal information is treated securely and in accordance with this Privacy Policy, the South Africa, and the resort country may not offer a level of privacy protection for personal information as great as that offered in your home country or other jurisdictions. Therefore, disclosing your personal information to us pursuant to this Privacy Policy is at your own risk. We strive to comply with the laws of jurisdictions in which we maintain resorts, but we make no representations that the practices described in this Privacy Policy are compliant with laws outside of those jurisdictions that apply to the collection, security, use, processing, transfer and disclosure of personal information. When you make booking on this Site you expressly consent to such transfer, storing and processing, unless you notify us specifically in writing at the address provided below.

9. SECURITY

We use reasonable technical, administrative and physical measures to protect personal information contained in our system against misuse, loss or alteration. Keep in mind however, that no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security. We cannot enforce or control the security of the computers, electronic devices, or electronic communication method that a consumer may utilize to send e-mails and submit personal information to us over the Internet. You are responsible for ensuring that the computers, electronic devices and electronic communication methods you utilize will provide adequate security for communicating with us. You are also responsible for the use of any user name and password you create to access this Site; any instructions we receive using your login

information will be treated as authorized by you. We are not responsible for the disclosure or interception of your personal information before we receive it.

10. YOUR CHOICES

We offer you the choice of how you receive communications from us. You have the right to tell us to stop using your information for our direct marketing purposes. Please send your written request, including your name and contact information to the address listed below. We will honour your request within 20 days of receiving it or such time period as required by local law. Please be aware that opting out will not prevent us from sending you communications about your transactions or your account with us.

11. THIRD PARTY LINKS

We may permit third parties to link to this Site or to post a link to their site on ours. We do not endorse these sites and are not responsible for other sites or their privacy practices. We encourage you to be aware when you leave our Site and to read the privacy statements of each and every website that collects personally identifiable information. This Privacy Policy applies only to personal information collected by our Site.

12. CHILDREN'S PRIVACY

This Site is not designed nor intended to be attractive for use by children under the age of 13. We do not knowingly collect from children under the age of 13, though we may collect personal information about a child that is provided by a parent or guardian. We respect the privacy of children, and do not collect any more personal information than reasonably necessary to enable them to participate in the activities we offer at our Site. We will not use personal information knowingly collected on our website from children for direct sales solicitations without their parent or guardian's consent and in compliance with applicable law.

13. CHANGES TO THIS PRIVACY POLICY

From time to time and without notice we may make changes to this Privacy Policy to reflect any changes to our privacy practices in accordance with changes to legislation, best practice or website enhancements. From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our

Privacy Policy. If our information practices change at some time in the future, we will post the Privacy Policy changes to our Site to notify you of these changes and provide you with the ability to opt out of these new uses. Any revised Privacy Policy will only apply prospectively to personal information or non-personal information collected or modified after the effective date of the revised policy. You should periodically review the Privacy Policy available at our Site for revisions. Use of our Site after revision of the Privacy Policy signifies your consent to the revised Privacy Policy.

14. HOW TO CONTACT US

- 14.1 If you have any questions or complaints regarding this Privacy Policy or any requests concerning your personal information, please contact us by email at info@newmarkhotels.com or by mail at our postal address:

Customer Services

Newmark Hotels (Pty) Ltd

2nd Floor, Merchant House,

19 Dock Road, V&A Waterfront,

Cape Town, South Africa, 8001

- 14.2 In order to ensure your request is dealt with expeditiously, please be sure to include your full name, address and telephone number and a copy of a document evidencing your identity (such as an ID card or passport) so we can ascertain your identity and whether we have any personal information regarding you, or in case we need to contact you to obtain any additional information, we may require to make that determination. If you feel that this Site is not following its stated policy or complying with applicable privacy laws, please contact us by sending an email to crm@newmarkhotels.com.

15. RIGHT OF ACCESS, RIGHT TO RECTIFY AND THE RIGHT TO OBJECT TO THE PROCESSING OF PERSONAL INFORMATION

You have a right of access to and the right to rectify your Personal Information that Newmark processes. You also have a right to object, on reasonable grounds, to the processing of Personal Information as provided for in POPIA. Such requests can be made at info@newmarkhotels.com. You also have the right to lodge a complaint with the Information Regulator. The details for the Information

Regulator are as follows: Woodmead North Office Park, 54 Maxwell Drive Woodmead, Johannesburg, 2191; Email. enquiries@info regulator.org.za; Phone. 010 023 5200.

16. EFFECTIVE DATE

The effective date of this Privacy Policy is from 15 October 2025.

ANNEXURE A: ENTITIES UNDER NEWMARK HOTELS (PTY) LTD MANAGEMENT

1. V&A Hotel Proprietary Limited
2. La Maison "Ete
3. Francon Investments Proprietary Limited t/a The Winchester Boutique Hotel
4. Incocure Proprietary Limited t/a The Rockefeller Hotel
5. Motswari Wildlife Services Proprietary Limited
6. K2017/416329 Proprietary Limited t/a The Onyx Hotel
7. The Catalyst Hotel Proprietary Limited
8. Kashewcat Proprietary Limited t/a Kashew Restaurant
9. Lakowe Lakes Hospitality Limited
10. Future Found Hospitality Group Proprietary Limited t/a Future Found Sanctuary
11. Mont Mystik Limited
12. SARPHC Properties Proprietary Limited t/a Qwabi Private Game Reserve
13. Tingamate Proprietary Limited t/a La Splendida
14. Nkomazi Game Reserve Proprietary Limited
15. Blaauklippen Agricultural Estates Stellenbosch Proprietary Limited
16. Mount Cambedoo Proprietary Limited
17. Hakuna Matata Beach Lodge Limited t/a Chuini Zanzibar Beach Lodge
18. Gorilla Heights Lodge Limited
19. Twalumba USA LLC (through its affiliate Taita Outlook (Private) Limited)
20. Thitaka Rivier Lodge Proprietary Limited
21. Idada Trading 289 Proprietary Limited t/a Toro River Lodge
22. Velvet Ant Trading Proprietary Limited t/a MRKT and YU Restaurants