

BELMOND

Global Data Privacy Notice for Staff and Others

Last Updated: 29 June 2023

1. Introduction

Belmond Management Limited, together with our holding company(ies), affiliates, subsidiaries (together, "Belmond", "we", "us", or the "Company") have issued this Global Data Privacy Notice to describe how we handle personal information that we hold about our staff, including those who work on a permanent and nonpermanent basis, and other individuals, including contingent workers, temporary and contract workers, independent contractors, consultants, professional advisors, secondees, interns, and job applicants (collectively referred to as "**you**").

We respect the privacy rights of individuals and are committed to handling personal information responsibly and in accordance with applicable law. This Notice sets out the personal information that we collect and process about you, the purposes of the processing, and the rights that you have in connection with such personal information and its collection and processing.

If you have any questions regarding the applicable law, or have any comments or questions about this Notice, please contact us at the contact details in Section 13 below.

2. Types of personal information we collect

In the course of your employment at Belmond, or when making an application for employment to Belmond, or when providing services as an independent contractor, consultant, professional advisor, secondee, or intern, or as a job applicant to Belmond, we may process personal information about you and your dependents, beneficiaries and other individuals (from whom you are expected to obtain their consent) whose personal information you have provided to us.

The types of personal information we may process include, but are not limited to:

- i.* Identification data – such as your name, gender, photograph, date of birth, staff member identification.
- ii.* Contact details – such as home and business addresses, personal and business telephone and email addresses, emergency contact details.
- iii.* Employment details – such as job title/position, office location, employment contract, performance and disciplinary records, grievance procedures, sickness/holiday records.
- iv.* Background information – such as academic/professional qualifications, education, CV/resumé, criminal records data (for vetting purposes, where permissible and in accordance with applicable law), and professional references.
- v.* National identifiers – such as national ID/passport, immigration/visa status, social security numbers (US only).
- vi.* Spouse and dependents' information, marital status.
- vii.* Financial information – such as banking details, tax information, withholdings, salary, benefits, expenses, company allowances, stock and equity grants.
- viii.* IT information – information required to provide access to Belmond IT systems and networks such as IP addresses, log files and login information.

- ix. Any other information you provide to us – this may include information you provide through internal surveys, choose to include on your Belmond intranet profile or post on our notice boards or intranet, such as photographs, birthdays or biographical details.
- x. Sensitive personal information includes, among other things, any information that reveals your racial or ethnic origin, religious, political or philosophical beliefs, genetic data, biometric data for the purposes of unique identification, trade union membership, information about your health, gender and sexual orientation ("**Sensitive Personal Information**").

As a general rule, we make every attempt to limit the collection and processing of Sensitive Personal Information about you, unless authorized by law or where necessary to comply with applicable laws. However, in some circumstances, we may need to collect, or request on a voluntary disclosure basis, Sensitive Personal Information for legitimate employment-related purposes: for example, information about your racial/ethnic origin, gender and disabilities for the purposes of equal opportunities monitoring, to comply with anti-discrimination laws, and for government reporting obligations; or information about your health to provide work-related accommodations, health and insurance benefits to you and your dependents, or to manage absences from work.

3. Consent to processing fingerprint data

Some Belmond properties use IT systems which use fingerprints for identification purposes to (i) increase security (e.g., to ensure that access to keys is only granted to specific individuals); and (ii) ensure that your working hours and any absences from work are accurately recorded. Fingerprint data is only used for these limited purposes and will be deleted if your employment comes to an end. By accepting this Privacy Notice you hereby consent to your fingerprint being processed for the above purposes. You may withdraw your consent at any time by contacting your HR Manager who will ensure that an alternative solution is made available to you.

4. Sources of personal information

We may obtain personal information, including Sensitive Personal Information, from various sources other than you on a limited basis as follows:

- i. Career sites and agencies, among them, LinkedIn, indeed.com, totaljobs.com, craigslist.com and reed.co.uk, and social media sites, among them, Google, Twitter, Facebook, and Instagram, for recruitment purposes.
- ii. Agencies such as Hireright or Intellicorp for background checks
- iii. Your previous employers to provide a reference
- iv. Employment checking services such as, among others, in the U.K., the Home Office of the UK Government, for confirmation of your eligibility to work in the country
- v. Immigration advisors such as, among others, Magrath, for visa and work-related applications
- vi. Business psychological assessment providers such as MHS Assessments and OPP Limited, for assessments for training and development purposes
- vii. Training services such as, among others, Venza and Rosetta Stone, to aggregate training completion and scoring
- viii. Occupational health service providers as needed for work accommodation purposes

5. Purposes for processing personal information

a. Recruitment purposes

If you are applying for a position at Belmond, we collect and use this personal information primarily for recruitment purposes – in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications and background for a particular role, verifying your information, carrying out reference checks or background checks (where applicable) and to manage the hiring process and communicate with you about it.

If you accept a position at Belmond, the information collected during the recruitment process will form part of your employment record.

If you are not successful in the application process, we may keep your application on file to allow us to consider you for other suitable openings at Belmond in the future.

b. Employment or work-related purposes

We collect and use this personal information for the purpose of managing our employment and working relationship with you – for example, your employment records and contract information (so that we can manage our employment relationship with you), your bank account and salary details (so that we can pay you), your equity grants and benefits elections (for stock and benefits plans administration) and details of your spouse and dependents (for emergency contact and benefits purposes).

We process your personal information through our human resources systems ("**HR Systems**"), which is a tool that helps us to administer human resources ("**HR**") matters and your compensation and benefits at an international level and which allows you to manage your personal information in some cases. This will involve transferring your personal information to our servers in various parts of the world. We may host these servers or utilize third-party servers, but in either case we will be responsible for the security access of personal information on the HR Systems.

c. The Belmond global directory

We maintain a global directory which includes your professional contact details (such as your name, location, photograph, job title, and contact details) and any other information you choose to include.

This information will be available to everyone in Belmond to facilitate global cooperation, communication, and teamwork.

d. Other legitimate business purposes

We may also collect and use personal information when it is necessary for other legitimate purposes, such as to help us conduct our business more effectively and efficiently – for example, for general HR resourcing on a global level, implementing organizational improvements, IT security/management, accounting purposes, or financial planning, or in connection with employee surveys. We may also process your personal information to investigate violations of law or breaches of the Company's internal policies.

e. Law-related purposes

We also may use your personal information where we consider it necessary for complying with laws

and regulations, including collecting and disclosing your personal information as required by law (for example, for, among others, tax, health and safety, and anti-discrimination laws), under judicial authorization, or to exercise or defend the legal rights of Belmond.

6. Who we share your personal information with

We take care to allow access to personal information only to those who require such access to perform their tasks and duties, and to third parties who have a legitimate purpose for accessing it.

Whenever we permit a third party to access personal information, we will implement appropriate measures to ensure both that the information is used in a manner consistent with this Notice and the security and confidentiality of the information is maintained.

a. Transfers to other group companies

As set out above, we will share your personal information within Belmond and with our affiliated companies which form part of the LVMH Group to administer HR matters, to administer your compensation and benefits at an international level on the HR Systems, and for other legitimate business purposes such as IT services/security, tax and accounting, and general business management.

b. Transfers to third party service providers

In addition, we make certain personal information available to third parties who provide services to us. We do so on a "need to know basis" and in accordance with applicable data privacy law.

For example, some personal information will be available to certain of the Company's service providers such as ADP, Studio Stern, and Compass for compensation administration, payroll support, and benefits administration; Computershare for stock plan administration; Workable, the Company's careers application management system hosted by Amazon Web Services; Talent Toolbox for administration of performance evaluations and employees' personal goals and objectives; and Microsoft to host the Company's email system.

c. Transfers to other third parties

We may also disclose personal information to third parties on other lawful grounds, including:

- i.* To comply with our legal obligations, including where necessary to abide by laws, regulations and contracts, or to respond to a court order, administrative or judicial process, including, but not limited to, a subpoena, government audit or search warrant
- ii.* In response to lawful requests by public authorities (including for national security or law enforcement purposes)
- iii.* As necessary to establish, exercise or defend against potential, threatened or actual litigation
- iv.* Where necessary to protect the vital interests of another person
- v.* In connection with the sale, assignment or other transfer of all or part of our business • With your consent.

7. Legal basis for processing personal information (European Economic Area, Switzerland and United Kingdom members only)

If you are located in the European Economic Area, Switzerland or the United Kingdom, our legal basis for collecting and using the personal information described above will depend on the personal

information concerned and the specific context in which we collect it.

However, we will generally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you (i.e., to administer an employment or work relationship with us), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise require the personal information to protect your vital interests or those of another person.

If you have questions about, or need further information concerning, the legal basis on which we collect and process your personal information, please contact us using the contact details provided in Section 13 below.

8. Transfer of personal information abroad

As we operate at a global level, we may need to transfer personal information to countries other than the ones in which the information was originally collected. When we export your personal information to a different country, we will take steps to ensure that such data exports comply with applicable laws. For example, if we transfer personal information from the European Economic Area to a country outside the European Economic Area, such as the United States or the United Kingdom, we will implement an appropriate data export solution, such as entering into EU standard contractual clauses with the data importer or taking other measures to provide an adequate level of data protection under EU law. The same is true with regard to any transfers we make from the United Kingdom to another country outside of the European Economic Area, such as the United States.

9. Data retention periods

Personal information will be stored in accordance with applicable laws and kept only as long as required to carry out the purposes described in this Notice or as otherwise required by applicable law. Generally this means your personal information will be retained until the end of your employment, employment application, or work relationship with us, plus a reasonable period of time thereafter to respond to employment or work-related inquiries or to deal with any legal matters (e.g., judicial or disciplinary actions), document the proper termination of your employment or work relationship (e.g., to tax authorities), or to provide you with continuing pensions and retirement savings plans or other benefits.

Please see the attached schedule to this Notice which sets out the Company's data retention periods.

10. California Privacy Rights

This section contains disclosures required by the California Consumer Privacy Act ("CCPA") and applies only to "personal information" that is subject to the CCPA. For example, this notice does not apply to personal information that is exempted from the CCPA, such as personal information covered by other privacy laws like the Health Insurance Portability and Accountability Act, the Confidentiality of Medical Information Act, or the Fair Credit Reporting Act.

- a. **Personal Information We Collect.** In the preceding 12 months, we collected the following categories of personal information about California consumers. We do not sell the personal information we collect about you or share this information for targeted advertising purposes.

Categories of Personal Information	Categories of Sources	Disclosed for business purposes to the following categories of third parties:	Disclosed for a commercial purpose to the following categories of third parties:
Personal and online identifiers (such as first and last name, email address, or unique online identifiers)	All categories of sources listed above.	All categories listed above.	All categories listed above.
Categories of information described in Section 1798.80(e) of the California Civil Code (such as insurance policy number, bank account number, or any other financial information, medical information, or health insurance information)	All categories of sources listed above.	All categories listed above.	All categories listed above.
Characteristics of protected classifications under California or federal law (such as race or gender)	All categories of sources listed above.	All categories listed above.	All categories listed above.
Commercial or transactions information (such as expense records)	All categories of sources listed above.	All categories listed above.	All categories listed above.
Internet or other electronic network activity information (such as browsing history, search history, interactions with a website, email, application, or advertisement)	All categories of sources listed above.	All categories listed above.	All categories listed above.
Biometric information (such as fingerprints)	All categories of sources listed above.	All categories listed above.	All categories listed above.
Sensory information (such as audio, electronic, visual, or similar information)	All categories of sources listed above.	All categories listed above.	All categories listed above.
Professional or employment-related information	All categories of sources listed above.	All categories listed above.	All categories listed above.
Education information	All categories of sources listed above.	All categories listed above.	All categories listed above.
Inferences drawn from the above information about your predicted characteristics and preferences	All categories of sources listed above.	All categories listed above.	All categories listed above.
Other information about you that is linked to the personal information above	All categories of sources listed above.	All categories listed above.	All categories listed above.

Some of the categories of personal information listed above are considered sensitive personal information under the CCPA. We do not use or disclose sensitive personal information, as defined by the CCPA, for purposes other than those specified in the CCPA.

- a. **How We Use Your Personal Information.** We use and disclose the personal information we collect about you for our commercial and business purposes. These commercial and business purposes include, without limitation:
 - i. Processing, evaluating, and communicating with you about your application, including to check references and communicate with you about other jobs that may interest you.
 - ii. Using your information in connection with your roles and responsibilities. This includes, for example:

- Providing you with services and tools to use in connection with your relationship with Belmond, such as email service and information technologies;
 - Responding to your requests;
 - Maintaining compliance with our policies and procedures;
 - Paying you and for employees, administering your employment benefits, including those provided to other individuals like family members; and
 - Responding to emergencies or safety concerns, such as by maintaining and using your emergency contact information.
- iii. Our commercial purposes, including facilitating transactions and providing you with offers available to employees.
- iv. Other business purposes as identified in the CCPA, which include:
- Auditing related to our interactions with you;
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;
 - Performing services (for us or our service providers) such as account servicing, processing orders and payments, and analytics;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our business; and
 - Other one-time uses.

We may collect information about you that is unrelated to your role within our company, if you visit our website or one of the websites or apps that uses our services. More information about our privacy practices and your rights as a consumer under the CCPA can be found in our [California Privacy Notice](#).

11. Your data privacy rights

You may exercise the rights available to you under applicable data protection laws as follows:

- i.* If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided at Section 13 below.
- ii.* If you are resident of California, you have the right **to confirm whether we are processing personal information** about you and **to request that we disclose the categories of personal information we collected about you individually**, the categories of sources from which the information was collected, the business or commercial purposes for which we collected or sold that information, and the categories of third parties to whom the information was sold or disclosed for a business purpose in the last 12 months.
- iii.* In addition, depending on your jurisdiction, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided at Section 13 below.
- iv.* If we have collected and process your personal information with your consent, then you can

withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- v. Residents of the European Union and the United Kingdom have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.
- vi. You have the right **not to be discriminated against** for the exercise of the above privacy rights.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

In some cases, we may need to request additional information from you to verify your identity or understand the scope of your request. Generally, we verify your identity by matching the information provided in your request with the information we maintain in our records. We will require you to provide, at a minimum, your name, relationship to Belmond, and email address.

You may designate an authorized agent to submit a CCPA request on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide the agent with signed permission to do so and provide proof of your identity, or the agent must have a valid power of attorney. An authorized agent can make a request on your behalf through one of the submission methods noted above. In order for us to process the request, the authorized agent will be required to provide evidence of signed permission and your e-mail address to verify your identity, or proof of valid power of attorney.

12. Updates to this Notice

This Notice may be updated periodically to reflect any necessary changes in our privacy practices. In such cases, we will inform you by way of the Company's intranet and indicate at the top of the Notice when it was most recently updated. We encourage you to check the Company's intranet periodically for the most recent version of this Notice.

13. Contact details

Please address any questions or requests relating to this Notice to the Company's Data Protection Officer at dpo@belmond.com or to the Corporate Legal Department at legal@belmond.com. California residents may also submit requests through our request portal available [here](#).

Alternatively, you may raise any concerns with your line manager or local HR department.

From 1 January 2021, Belmond has an appointed Representative for data protection matters in the EU, as required under European data protection legislation:

Belmond Italia S.p.A. Via B. Cavalieri 4, 20121 Milan, Italy. Email: legal@belmond.com

SCHEDULE OF RETENTION PERIODS FOR PERSONAL INFORMATION

Type of Data	Retention Period
--------------	------------------

Employee HR Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, training and qualification record)	6 years after leaving
Recruitment data including correspondence with recruitment agencies, CVs, job applications	6 months after a decision has been made
Recruitment data (Hold on file requests)	1 year after receiving CV/application
Accident, personal Injury, and health and safety related Data	6 years after leaving
Employment contracts and related Documentation	6 years after leaving
Deed documentation	12 years after leaving
Tax related documentation	7 years after the relevant tax year has ended, unless there is an open audit at the Company
Company share award information	Keep for life
Pension information	Keep for life
Reference data (Job title, dates of employment, reason for leaving, and other agreed information)	Keep for life