

## Privacy Policy for European and Swiss Customers (GDPR / LPD)

Quokka Sagl (P. IVA CHE-433.635.986), in the person of its legal representative pro tempore, with registered office in Piazza Santa Lucia, 7 6900 Massagno Ticino as Data Controller, informs you that, in compliance with the New Federal Data Protection Law (DPA) and the GDPR 679/2016 Regulation, which regulate the protection of personal data and their free movement, your personal data will be processed in accordance with the New Federal Data Protection law (LPD) and the GDPR Regulation 679/2016 respectively, where applicable, in accordance with the principles of fairness, lawfulness, proportionality of interests and transparency, as well as the protection of your privacy and your rights, for the purposes, in the manner and under the terms set out below.

### -1- Purposes, methods and legal bases of data processing

Your personal data will be processed exclusively for purposes strictly connected, instrumental and necessary to the fulfilment of the obligations inherent to the relationship with our Company; in particular: the processing of personal data is carried out by means of the operations of collection, registration, organization, storage, consultation, processing, modification, selection, extraction, comparison, use, interconnection, blocking, communication, cancellation and destruction. Personal data shall be processed by means of paper and/or computer media by the data controller, the person(s) in charge and the authorized persons (appointees) with the observance of all precautionary measures guaranteeing their security and confidentiality. The data will not be subject to profiling or automated decision-making processes. The data will be stored at the data controller and at the data processors designated by the data controller. In any event, your personal data will be stored and processed within the borders of the Helvetic Confederation or those of the European Union. The explicit acceptance of this information by means of a paper signature, computer acceptance (opt-in) made online, fulfilment of contractual obligations and other conditions provided for by the laws and regulations concerning the protection of personal data and constitutes the legal basis for the processing of personal data.

### -2- Nature of data collection and consequences of failure to provide data

The provision of your personal data is mandatory in order to execute the existing contract or the services requested and to fulfil the obligations arising therefrom, including legal obligations. Your data may be collected and processed on the basis of legitimate interest insofar as necessary to fulfil legal obligations under current regulations.

Failure to provide consent may result in our inability to fulfil our contractual obligations or the services requested. Consent to the use of your data for marketing and/or advertising purposes (sending e-mails and/or communications with advertising offers), on the other hand, is optional.

**Special categories of personal data:** Pursuant to Articles 5 and 6 of the DPA and Art. 9 of Regulation 679/2016 GDPR, you may provide data that qualifies as 'personal data worthy of special protection', i.e. data concerning religious, philosophical, political or trade union opinions or activities, health, intimate and family life or membership of a race or ethnic group, genetic data biometric data that uniquely identify a natural person, data concerning social assistance measures.

### -3- Timing and terms

The Data Controller, data processors and authorized persons (appointees) shall process personal data for the time necessary to fulfil the purposes set out above and, in any case, for no longer than 10 years from the termination of the relationship where this is provided for or made necessary by the regulations in force.

### -4- Communication and dissemination of data

Your personal data, for the purposes of executing the contract and for the purposes indicated above, may be communicated:

- to all natural and legal persons (by way of example but not limited to legal, administrative and tax consultancy firms, auditing firms, couriers and forwarding agents, data processing center, consultants, IT consultants, suppliers, etc.) in cases where communication is necessary for the purposes described above;

- to banking institutions for the management of collections and payments;

- to factoring or debt collection companies;

- to our collaborators and employees specifically appointed for this purpose and within the scope of their duties;

- to our service providers where necessary to carry out the activities covered by our company's service contract;

- to the owner of the property leased to the tenant for purposes related to the signing of the contract and the fulfilment of related regulatory aspects.

### -5- Rights of the data subject

By calling +410919240108 or writing to [info@quokka360.com](mailto:info@quokka360.com) at any time you may exercise your rights vis-à-vis the Data Controller (Data Controller) in accordance with the New Federal Data Protection Law (LPD) and the GDPR 679/2016 Regulation, which we reproduce for your convenience. The data subject shall have the right to obtain confirmation of the existence and/or the fact that personal data concerning him/her is or is not being processed, even if not yet registered, as well as its communication in intelligible form. The data subject has the right to be informed:

- the origin of the personal data (with particular regard to the case where the data are not collected from the data subject and, in the case of transfer of data to a third country, the existence of appropriate guarantees of the purposes and methods of processing;

- of the logic applied in the event of processing carried out with the aid of electronic instruments;
- the identity of the data controller, data processors and the designated representative;
- of the entities or categories of entity to whom or which the personal data may be communicated or who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or authorized entity(ies);
- the categories of personal data being processed;
- the retention period of the data or the criteria used to determine this period;
- the existence of automated decision-making processes, with particular regard to profiling, and the logic applied to them;
- the right to obtain a copy of the personal data being processed;

The data subject also has the right to obtain:

- the updating, rectification or, when he/she is interested, the integration of data;
- the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
- certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
- for legitimate reasons relating to his particular situation, even if the processing is relevant to the purpose of the collection;
- the portability of the data to other subjects, for which an explicit request must be made to the following addresses

+410919240108, info@quokka360.com ;

- the cancellation of the data in our archives (so-called right to be forgotten), by means of a communication to +410919240108, info@quokka360.com ;

- to restrict the processing of data in accordance with the Federal Data Protection Law (LPD).

The data subject also has the right to object, in whole or in part, to the processing of data:

- the processing of personal data concerning him/her for the purpose of sending advertising materials or direct selling or for the performance of market research or commercial communication; the processing of data including profiling on the basis of such provisions.

Where the processing of data is based on the data subject's consent, the data subject shall have the right to withdraw such consent at any time by making an explicit request to the following address: +410919240108 or info@quokka360.com. The data subject shall also have the right to lodge a complaint with the Control Authority. The exercise of the aforementioned rights may be exercised by making a request to the Data Controller or the person in charge by telephone, by email to the above-mentioned addresses or by registered letter with return receipt.

## **Consent of the data subject**

In requesting your express manifestation of your consent to the processing (which we shall, however, consider to have been given orally in the event that you do not return this undersigned letter), we shall consider you, as of now, informed about the processing carried out by us, pursuant to and for the purposes of the Federal Data Protection Law (LPD) and the GDPR Regulation 679/2016. I, the undersigned, having acquired the information provided by the Data Controller:

I give my consent to the processing of my personal data for the purposes indicated in the above information notice

O - I give consent O - I withhold consent

I give my consent to the communication of my personal data for the purposes and to the third parties indicated in the information under -4-

O - I give consent O - I deny consent

I give my consent for the use, also for advertising and profiling purposes, of my personal data for the purposes and within the scope indicated in the Information Notice.

O - I give consent O - I withhold consent

Surname..... First name.....

Date and Place, ..... Signature.....

## **Privacy Policy for North American Customers**

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of our customers in the United States. This Policy describes how we collect, use, disclose, and protect your personal information in accordance with applicable laws, including the California Consumer Privacy Law (CCPA/CPRA), the Virginia Consumer Data Protection Law (VCDPA), and other relevant State and Federal Regulations.

## 1. Information We Collect

We may collect the following categories of personal information:

- Identifying Data: Name, address, telephone number, email;
- Financial data: Payment information, transaction history, credit cards, bank accounts;
- Browsing data: IP address, browser type, activity on our website cookies;
- Sensitive data (only if necessary) Health information (under HIPAA) or other specific data required by law;
- Personal documents, ID card, passport, residence permits, other personal documents required for tourist stay.

## 2. How we use your data

We use your data to:

- Provide our services and complete requested transactions;
- Receive and return any deposits;
- Improve your experience on our website and personalize content;
- Respond to customer service and support requests;
- Fulfill legal and regulatory obligations.

## 3. Sharing of personal data

We may share your data with:

- Service providers who support our activities (e.g. payment processing, marketing analysis);
- Government authorities, if required by law or to protect our rights;
- Suppliers and advertising partners, in accordance with the CCPA and other privacy regulations;

## 4. Your privacy rights

Under applicable state law (e.g. CCPA/CPRA, VCDPA), you have the right to:

- Access your personal data;
- Request deletion of your data, subject to legal exceptions;
- Object to the sale or sharing of your data (for California residents);
- Correct incorrect information about you;
- Restrict the use of sensitive data (if applicable).

To exercise your rights, you can contact us at [info@quokka360.com](mailto:info@quokka360.com) or call +410919240108.

## 5. Data security

We take technical and organizational measures to protect your data from unauthorized access, misuse or disclosure. However, no system is completely secure, so we recommend that you protect your access credentials.

## 6. Changes to this policy

We reserve the right to update this policy periodically. We will notify you of any significant changes by posting a notice on our website.

## 7. Contact

If you have any questions or requests about privacy, you can contact us at:

Email : [info@quokka360.com](mailto:info@quokka360.com).

Telephone : +410919240108

If you reside in California and wish to exercise your rights under the CCPA, you may also submit a request via our online form available at [www.quokka360.com](http://www.quokka360.com).

This notice complies with the privacy laws of the United States, including those of California, Virginia, and applicable federal regulations.

## Privacy Policy for Customers in Latin America

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of its customers in Latin America by ensuring compliance with the data protection laws in force in the different countries of the region. These include:

- Brasil : Lei Geral de Proteção de Dados Pessoais (LGPD);
- México : Ley Federal de Protección de Datos Personales en Posesión de los Particulares (LFPDPPP);
- Argentina : Ley de Protección de los Datos Personales (Ley 25.326);
- Chile : Ley N° 19.628 sobre Protección de la Vida Privada;
- Colombia : Ley 1581 de 2012 y Decreto 1377 de 2013;
- Peru: Ley de Protección de Datos Personales (Ley N° 29733).

This policy explains in detail how we collect, use, share and protect your personal data in accordance with local laws.

### 1. Personal data we collect

Depending on the service requested and the legislation in your country of residence, we may collect the following categories of personal data:

#### 1.1 General Data

- First and last name;

- Home address;
- Telephone number;
- Email address;
- Personal documents, identity card, passport, residence permit, other personal documents required for the tourist stay.

## 1.2 Financial and payment data

- Credit or debit card details;
- Bank information for processing transactions;
- Purchase and transaction history.

## 1.3 Browsing and technological data

- IP address and device identifiers;
- Cookies and tracking technologies;
- Data on navigation on our website and user preferences.

## 1.4 Sensitive data (only where necessary and with explicit consent)

In some cases, we may collect information that is considered sensitive data by law, such as:

- Health data (if necessary for the provision of a specific service);
- Biometric data (e.g. fingerprints or facial recognition for access to certain services).

For the collection and processing of sensitive data, we will always require your explicit consent, as required by the LGPD (Brazil) and similar regulations in Argentina, Colombia and other countries.

## 2. Purpose of data processing

We use your personal data for:

- Provide you with our products and services (e.g. order processing, shipping, invoicing);
- Improve the customer experience by analyzing data about purchasing preferences and customizing offers;
- Ensure the security of transactions by preventing fraud and unauthorized access;
- Communicate with you, sending updates on orders, special offers or changes to terms of service;
- Respond to customer service and support requests;
- Fulfilling legal obligations as required by local regulations.

## 3. Legal basis for data processing

We only process your data when we have a valid legal basis, which may include:

- Explicit consent : When required by law (e.g. for sensitive data or direct marketing activities);
- Performance of a contract : When the data is necessary to provide you with a requested service;
- Legal obligation : When we are required by law to retain or provide data to authorities;
- Legitimate interest : When we use data to improve our services, prevent fraud or ensure security. In compliance with the regulations, Brazil (LGPD) and Argentina (Ley 25.326), your consent will be requested explicitly for certain specific processing activities.

## 4. Sharing of personal data

Your personal data may be shared with:

- Third party service providers , such as payment, logistics, IT and marketing platforms;
- Government authorities , if required by law or to comply with legal obligations;
- Advertising partners, but only with your explicit consent (if required by local law);
- Sharing for direct marketing purposes only if you have given your consent;
- Profiling only if you have given your explicit consent.

If your data is transferred outside your country (e.g. to servers in the United States or Europe), we ensure that it is protected by appropriate measures, such as EU-approved Standard Contractual Clauses or other guarantees required by local DPA Law.

## 5. Your privacy rights

Depending on your country of residence, you may have the following rights to your personal data:

Diritto	Brasile (LGPD)	Messico (LFPDPPP)	Argentina (Ley 25.326)	Colombia (Ley 1581)	Perù (Ley 29733)
Accesso ai dati	✓	✓	✓	✓	✓
Rettifica dei dati	✓	✓	✓	✓	✓
Cancellazione dei dati	✓	✓	✓	✓	✓
Opposizione al trattamento	✓	✓	✓	✓	✓
Portabilità dei dati	✓	✗	✗	✗	✗
Revoca del consenso	✓	✓	✓	✓	✓

To exercise your rights, you can contact us at [info@quokka360.com](mailto:info@quokka360.com) or call +410919240108 .

## 6. Data storage and security

We take appropriate technical and organizational measures to protect your personal data against unauthorized access, alteration, disclosure or destruction. Such measures include:

- Data encryption;
- Strict access controls;
- Continuous monitoring of our IT infrastructure;
- Staff training on data protection.

## 7. International data transfers

If your data is to be transferred outside your country, we ensure that this is done in accordance with local regulations. We use protective measures such as:

- Standard contractual clauses (for transfers to countries with less stringent privacy laws);
- Specific agreements with suppliers to ensure processing in accordance with local laws.

## 8. Changes to this policy

We reserve the right to update this policy. Any changes will be communicated via our website or other appropriate means.

## 9. Contact

If you have any questions or requests about privacy, you can contact us at:

Email :info@quokka360.com.

Telephone : +410919240108.

This policy complies with data protection laws in Latin America, including Brazil, Mexico, Argentina, Chile, Colombia and Peru .

## 日本における個人情報保護方針

[貴社名] は、個人情報の保護に関する法律〔APPI〕日本の個人情報保護法およびその最新の改正に基づき、日本におけるお客様のプライバシー保護に努めています。

本方針は、日本の法律に従い、当社がお客様の個人情報をどのように収集、使用、共有、保護するかを説明するものです。

### 1. 収集する個人データ

要求されたサービスに応じて、当社は以下のカテゴリーの個人データを収集することがあります：

#### 1.1 識別データ

- 姓名
- 住所
- 電話番号
- Eメールアドレス
- 身分証明書、パスポート、滞在許可証などの個人書類、その他観光滞在に必要な個人書類。

#### 1.2 財務および支払いデータ

- クレジットカード番号またはデビットカード番号
- 支払管理のための銀行情報
- 取引履歴

#### 1.3 閲覧および技術データ

- IPアドレス
- デバイスおよびブラウザ情報
- クッキーおよびトラッキングデータ
- 当社ウェブサイトの閲覧履歴およびインタラクション

#### 1.4 機微（センシティブ）データ（必要な場合に限り、明示的な同意を得た場合のみ

APPIに従い、当社は、必要な場合に限り、お客様の明示的な同意を得て、機微な個人データを収集することがあります。これには以下が含まれます：

- 健康データまたは生体データ
- プロファイリングおよび購買行動
- その他、日本の法律で「特別な個人情報」と定義されているデータ

## 2. データ処理の目的

当社は、お客様の個人情報を以下の目的で利用します：

- 製品およびサービスの提供：注文処理、発送、カスタマーサービス
- ユーザーエクスペリエンスの向上：サイトおよびコミュニケーションのパーソナライズ
- 支払い処理と不正行為の防止：取引の確認と財務の安全性。
- コミュニケーション：注文、プロモーション、会社の最新情報に関する電子メールの送信。
- 法的および規制上の義務：税務および消費者保護規制の遵守。

上記以外の目的でお客様のデータを使用する場合は、事前にお客様に通知し、法律で義務付けられている場合はお客様の同意を求めます。

## 3. データ処理の法的根拠

日本では、個人データの処理は、APPIに規定された以下の条件のいずれかに基づいて行われなければならない：

- ユーザーの同意（機微データまたはマーケティング目的で必要な場合）。
- 契約上の必要性（要求されたサービスの提供のため）。
- 法的義務（法律が特定のデータの収集または保持を要求する場合）。
- 正当な利益（サービスの向上および情報セキュリティのため）。

## 4. 個人データの共有および転送

お客様の個人データは、以下の者と共有されることがあります：

- サービスプロバイダー：決済、物流、カスタマーサービスIT企業。
- 公的機関：日本の法律で義務付けられている場合
- 広告パートナー：マーケティング活動およびターゲット広告のために、お客様の同意を得た場合に限りです。

### 4.1 国際的なデータ転送

当社がお客様のデータを日本国外に転送する場合（例えば、他国のサーバーに転送する場合）、当社は以下の方法によりAPPI規制の遵守を確保します：

- 移転先国における適切な保護措置。
  - データの受領者との契約上の合意。
  - 日本の法律が要求するものと同等のセキュリティ条項。
- お客様のデータが日本と同等の保護基準を持たない国に転送される場合は、透明性のある方法でお客様に通知します。

## 5. お客様の個人情報に関する権利

APPIは、お客様の個人情報について、以下の権利を付与します：

権利	説明
データへのアクセス	保有するあなたの個人データのコピーを請求できます。
データの修正	誤ったまたは不完全なデータを修正する権利があります。
データの削除	法的義務がない限り、あなたのデータの削除を請求できます。
処理の制限	特定の目的のためにデータが使用されないよう要求できます。
同意の撤回	個人データの処理に同意した場合、いつでも撤回できます。

お客様の権利を行使するには、info@quokka360.comまたは +410919240108 にご連絡ください。

## 6. データの保持とセキュリティ

当社は、記載された目的を達成するために必要な期間、または日本の法律で義務付けられている期間のみ、お客様の個人データを保持します。弊社は、お客様のデータを以下から保護するためのセキュリティ対策を講じます：

- 不正アクセス
- 不慮の紛失
- 盗難または誤用

当社は、適切なレベルのセキュリティを確保するために、暗号化プロトコルを導入し、データアクセスを制御しています。

## 7. クッキーとトラッキング技術の管理

当社は、お客様のブラウジング体験を向上させるために、クッキーとトラッキング技術を使用しています。お客様は、ブラウザの設定を通じて、または当社のウェブサイトから直接、クッキーの設定を管理することができます。

また、お客様は、当社に連絡するか、お客様のデバイスの設定を使用して、クッキーに基づくターゲット広告を無効にすることもできます。

## 8. 本ポリシーの変更

当社は、日本の法律または当社の事業慣行の変更を反映するために、本ポリシーを定期的に更新する権利を留保します。変更があった場合は、当社のウェブサイトまたはその他の公式チャネルを通じてお知らせします。

## 9. 連絡先およびプライバシーに関する要求

ご質問、ご要望がある場合、またはプライバシーの権利を行使したい場合は、以下のアドレスまでご連絡ください：

電子メール\*: info@quokka360.com

電話番号\*: +410919240108

お客様のデータ処理が日本の法律に準拠していないと思われる場合、お客様は日本の個人情報保護委員会[PPC]に苦情を申し立てる権利を有します。

本通知は、日本国の個人情報の保護に関する法律[APPI]およびその最新の改正に準拠しています。

## Privacy Policy for customers Australia and New Zealand

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of its customers in Australia and New Zealand by complying with local data protection regulations:

- Australia : Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles (APPs);
- New Zealand : Privacy Act 2020 and its implementing guidelines

This policy explains how we collect, use, share and protect your personal information in accordance with Australian and New Zealand Law.

### 1. Personal information we collect

Depending on the service requested and local legislation, we may collect the following categories of personal data:

#### 1.1 Identifying data

- First and last name;



- Residential and/or shipping address;
- Telephone number;
- Email address;
- Identity document or passport, personal documents such as residence permits, other personal documents necessary for the tourist stay.

## **1.2 Financial and payment data**

- Credit or debit card number;
- Bank information for payment management;
- Purchase and transaction history.

## **1.3 Browsing and technological data**

- IP address;
- Device and browser information;
- Cookies and tracking data;
- Browsing history on our website.

## **1.4 Sensitive data** (only where necessary and with explicit consent)

In accordance with the Privacy Act 1988 (Australia) and the Privacy Act 2020 (New Zealand) , we may only collect sensitive personal data where necessary and with your explicit consent. These include:

- Health data (if required for the provision of certain services);
- Biometric information (e.g. fingerprints or facial recognition for access to certain services);
- Ethnic or religious origin (only if required for specific purposes and with your consent) Profiling and purchasing behaviors.

## **2. Purpose of data processing**

We use your personal data for the following purposes:

- Provision of products and services : order processing, shipping, invoicing and customer service;
- Improving user experience : personalization of the site and marketing communications;
- Payment processing and fraud prevention: transaction verification and financial security;
- Communications: emailing about orders, promotions and company updates;
- Legal and regulatory obligations: compliance with tax regulations.

If we intend to use your information for purposes other than those listed above, we will notify you in advance and request your consent when required by law.

## **3. Legal basis for data processing**

In Australia and New Zealand, the processing of personal data must take place on the basis of one of the following conditions:

- User consent (if required for sensitive data or marketing purposes);
- Contractual necessity (for the provision of requested services);
- Legal obligation (where the law requires the collection or retention of certain data);
- Legitimate interests (for the improvement of services, fraud prevention or security).

## **4. Sharing and transfer of personal data**

Your personal data may be shared with:

- Service providers: payment, logistics, customer service and IT companies;
- Public authorities where required by Australian or New Zealand law;
- Advertising partners, but only with your consent for marketing and targeted advertising.

### **4.1 International data transfer**

If we transfer your data outside Australia and New Zealand (e.g. to servers in other countries), we ensure compliance with local regulations through:

- Contractual agreements with data recipients;
- Adequate security measures, such as encryption and data protection protocols;
- Guarantees equivalent to those required by local laws , as required by the Australian Privacy Principle (APP) 8 and New Zealand's Privacy Act 2020 .

We will inform you in a transparent manner if your information is transferred to a country that does not have equivalent protection standards to those in Australia or New Zealand, asking for your prior consent to the transfer if required.

## **5. Your privacy rights**

In both Australia and New Zealand, you have the following rights over your personal information:

| Law | Australia (Privacy Act 1988) | New Zealand (Privacy Act 2020) |

Right	Australia (Privacy Act 1988)	New Zealand (Privacy Act 2020)
Access to data	✓	✓
Rectification of data	✓	✓
Deletion of data	✓	✓
Restriction of processing	✓	✓
Withdrawal of consent	✓	✓

To exercise your rights, you can contact us at [info@quokka360.com](mailto:info@quokka360.com) or call +410919240108.

## 6. Data retention and security

We retain your personal data for as long as necessary to fulfil the stated purposes or as required by law. We take advanced security measures to protect it from:

- Unauthorized access;
- Accidental loss;
- Theft or misuse.

Our protection measures include encryption, firewalls, access controls and constant monitoring of our IT infrastructure.

## 7. Management of cookies and tracking technologies

We use cookies and tracking technologies to improve your browsing experience. You can manage your cookie preferences through your browser settings or directly from our website.

You can also choose to disable targeted advertising based on cookies by contacting us or using your device settings.

## 8. Changes to this policy

We reserve the right to update this policy periodically to reflect any changes in Australian or New Zealand law or our business practices. We will notify you of any changes through our website or other official channels.

## 9. Contact and privacy requests

If you have any questions, requests or wish to exercise your privacy rights, you can contact us at the following addresses:

Email : [info@quokka360.com](mailto:info@quokka360.com).

Telephone : +410919240108.

If you believe that the processing of your data is not in accordance with the legislation, you may lodge a complaint with:

- Office of the Australian Information Commissioner (OAI) for Australia;
- Office of the Privacy Commissioner (OPC) for New Zealand

This notice complies with the Privacy Act 1988 (Australia) and the Privacy Act 2020 (New Zealand) and their implementing guidelines.

## Privacy Policy for Customers in Turkey, South Africa, Egypt, Kenya and Nigeria

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy of its customers in Turkey, South Africa, Egypt, Kenya and Nigeria by complying with local data protection regulations:

- Turkey : Law on the Protection of Personal Data No. 6698 (KVKK);
- South Africa : Protection of Personal Information Act (POPIA);
- Egypt : Egyptian Data Protection Law No. 151/2020;
- Kenya : Data Protection Act, 2019;
- Nigeria : Nigeria Data Protection Regulation (NDPR).

This policy describes how we collect, use, share and protect your personal information in accordance with local laws.

### 1. Personal data that we collect

We may collect the following personal data depending on the service you require and the regulations in your country:

#### 1.1 Identification data

- First and last name;
- Home or shipping address;
- Telephone number;
- E-mail address;
- Identity document, passport, personal documents such as residence permits, other personal documents necessary for the tourist stay.

#### 1.2 Financial and payment details

- Credit or debit card number;
- Bank information for handling payments;
- Purchase and transaction history.

#### 1.3 Browsing and technological data



- IP address;
- Device and browser information;
- Cookies and tracking data;
- Browsing history on our website.

#### 1.4 Sensitive data (only where necessary and with explicit consent)

Turkey, South Africa and Nigeria, provide additional protections for sensitive data, which we may only collect with your explicit consent and for legitimate purposes. These include:

- Biometric or health information (if required for certain services);
- Ethnic or religious origin (only if required and with your consent);
- Judicial data (only if required for legal or compliance procedures);
- Profiling and purchasing behavior.

#### 2. Purpose of data processing

We use your personal data for the following purposes

- Provision of products and services : order management, shipping and customer service;
- Improvement of user experience : personalization of the site and commercial offers;
- Payment processing and fraud prevention : transaction verification and financial security;
- Communications: Sending emails regarding orders, promotions and company updates;
- Legal and regulatory obligations: compliance with tax, data protection and information security regulations.

If we use your data for other purposes, we will inform you in advance and ask for your consent when required by law.

#### 3. Legal basis for data processing

Each country has specific data protection regulations. Our company processes your data on the basis of the following legal conditions:

Country	Legal Basis
Turkey	Consent, legal obligation, contractual performance, legitimate interest (KVKK)
South Africa	Consent, legal obligation, contractual necessity, legitimate interest (POPIA)
Egypt	Consent, contractual necessity, public interest (Law 151/2020)
Kenya	Consent, contractual necessity, legal obligation, public interest (Data Protection Act)
Nigeria	Consent, contractual necessity, legal obligation, legitimate interest (NDPR)

#### 4. Sharing and transfer of personal data

We may share your data with:

- Service providers : payment, logistics, customer service and IT companies;
- Public authorities , if required by local regulations;
- Advertising partners, only with your consent for marketing activities and targeted advertising.

##### 4.1 International data transfer

If your data is transferred outside your country, we take security measures to ensure adequate protection as required by local regulations. These include:

- Standard contractual clauses with data recipients;
- Technical security measures, such as encryption and multi-factor authentication.

#### 5. Your privacy rights

Depending on the country you are in, you have the right :

Right	Turkey (KVKK)	South Africa (POPIA)	Egypt (151/2020)	Kenya (DPA 2019)	Nigeria (NDPR)
Access to data	✓	✓	✓	✓	✓
Rectification of data	✓	✓	✓	✓	✓
Deletion of data	✓	✓	✗ (with exceptions)	✓	✓
Restriction of processing	✓	✓	✗	✓	✓
Withdrawal of consent	✓	✓	✓	✓	✓

To exercise your rights, you can contact us at [info@quokka360.com](mailto:info@quokka360.com) or +410919240108 .

If you believe that the processing of your data does not comply with the regulations, you can lodge a complaint with the competent authorities:

- Turkey : Personal Data Protection Authority (KVKK);
- South Africa : Information Regulator South Africa;
- Egypt : Egyptian Data Protection Center;
- Kenya : Office of the Data Protection Commissioner;
- Nigeria : National Information Technology Development Agency (NITDA).

## 6. Data retention and security

We retain your data only as long as necessary to fulfill the stated purposes or as required by law.

We adopt security measures such as:

- Advanced encryption to protect sensitive information;
- Firewalls and multi-factor authentication to prevent unauthorised access;
- Secure backups to ensure continuity of service.

## 7. Cookies and tracking technologies

We use cookies to improve your experience on our site. You can manage your cookie preferences directly from our site or through your browser settings.

## 8. Changes to this policy

We reserve the right to update this policy periodically to reflect any changes in local laws. We will notify you via our website or other official channels.

## 9. Privacy contacts

Email : [info@quokka360.com](mailto:info@quokka360.com).

Telephone : +410919240108.

If you have any concerns about the protection of your data, you may contact the local data protection authorities listed above.

This notice complies with the data protection laws of Turkey, South Africa, Egypt, Kenya and Nigeria .

## 中国客户隐私政策

[贵公司名称]承诺根据中国的数据保护法律法规保护其中国客户个人信息的隐私和安全，这些法律法规包括

- 个人信息保护法[PIPL]
- 网络安全法[CSL] - 网络安全法
- 数据安全法 - 《数据安全法》

本政策详细说明了我們如何根据中国法律收集、使用、共享和保护您的个人信息。

### 1. 我们收集的个人信息

我们可能会通过各种方式收集您的个人信息，例如当您访问我们的网站、使用我们的服务或与我们互动时。收集的数据包括

#### 1.1 身份资料

- 姓名
- 电话号码
- 电子邮件地址
- 住址和/或送货地址
- 个人身份号码（如法律验证所需的护照或身份证号码）

#### 1.2 财务和付款详情

- 信用卡/借记卡号
- 付款银行详情
- 交易记录

#### 1.3 浏览和技术数据

- IP 地址
- 设备类型和操作系统
- Cookies 和跟踪数据
- 网站浏览记录

#### 1.4 生物识别和敏感数据（仅在明确同意的情况下）

根据《个人信息保护法》，我们只能在征得您明确同意的情况下出于特定目的收集敏感数据，包括

- 生物识别数据（如用于身份验证的指纹或面部识别）
- 地理位置信息
- 健康数据（如特定服务需要）
- 分析和购买行为

### 2. 数据处理目的

收集您的个人数据仅用于以下目的：

- 提供产品和服务：订单管理、送货、开票和客户服务。
- 改善用户体验：根据您的偏好提供个性化的报价和建议。
- 付款管理和防欺诈：核实交易以确保财务安全。
- 通信和营销：发送促销电子邮件、更新通知和个性化优惠。

- 法律和监管义务：遵守中国的税务、海关和信息安全法规。

如果我们打算将您的信息用于本政策未涵盖的目的，我们将根据法律要求事先征得您的同意。

### 3. 数据处理的法律依据

根据《个人信息保护法》PIPL的规定，我们在处理个人数据时必须符合以下条件之一：

- 用户的明确同意（尤其是敏感数据和国际传输）。
- 履行合同（提供服务所需的数据）。
- 法律义务（法律要求我们收集或保留某些信息）。
- 合法利益（安全、防止欺诈和改善服务）。

### 4. 个人数据的保存和保护

您的数据只会为实现上述目的或中国法律要求的必要时间内保留。我们采取严格的安全措施保护您的数据，以防出现以下情况

- 未经授权的访问
- 滥用或泄露
- 意外修改或丢失

这些措施包括加密、多因素验证和持续的 IT 安全监控。

### 5. 个人数据的共享和传输

我们可能会与以下方面共享您的数据

- 服务提供商（例如，用于支付、物流和客户服务目的）。
- 中国政府机构，如果需要履行法律或国家安全义务。
- 广告合作伙伴，但必须征得您的明确同意。

#### 5.1 国际数据传输

根据《个人信息保护法》PIPL中国公民的个人数据必须存储在中国境内，除非我们获得政府许可将数据传输到国外。如果我们需将您的数据传输到中国境外，我们将确保

- 获得您的明确同意。
- 执行中国当局批准的标准合同条款。
- 确保数据接收方提供与 PIPL 同等的保护标准。

5.2 向我方提供的与履行合同有关的数据不属于第 5.1 条规定的义务范围，因为这些数据是由贵方自愿发送并由我方在我方所在国接收的。

在中国境外收集的数据，如果我们已获得您的明确同意进行收集和存储，则不属于第 5.1 条规定的义务范围。

### 6. 您对个人数据的权利

根据《个人信息保护法》，您有权

权利	描述
访问数据	您可以请求获取您的个人数据副本。
更正数据	您可以更正您的数据中的任何错误。
删除数据	您可以请求删除您的数据，但需遵守法律义务。
限制处理	您可以要求在特定情况下限制您的数据使用。
撤回同意	您可以随时撤回对数据处理的同意。
数据可携性	您可以请求将您的数据转移到另一个服务。

要行使这些权利，您可以通过 [info@quokka360.com](mailto:info@quokka360.com) 或 +410919240108 联系我们。如果您认为对您数据的处理不符合法律规定，您可以向中国网络空间管理局（CAC）投诉。

### 7. 和跟踪技术的使用

我们使用 Cookie 和跟踪工具来改善您的用户体验。您可以通过我们的网站或您的浏览器管理您的 cookie 设置。根据中国法律，未经您的明确同意，我们不能将 cookie 用于广告目的。

### 8. 本政策的变更

我们保留不时更新本政策的权利，以反映新法规或我们服务的变化。我们将通过网站或其他官方渠道提前通知您。

### 9. 隐私联系

如果您对个人数据保护有任何疑问或要求，请联系我们：

电子邮件：[info@quokka360.com](mailto:info@quokka360.com)

电话：+410919240108

如果您对我们的答复不满意，您可以联系中国网络空间管理局（CAC）进行投诉。本通知符合《个人信息保护法》PIPL及其他中国数据保护法规。

## Privacy Policy for Customers India

Quokka Sagl (P. IVA CHE-433.635.986) is committed to protecting the privacy and security of its customers' personal data in India in accordance with Indian data protection laws and regulations, including:

- Digital Personal Data Protection Act, 2023 (DPDP Act, 2023);

- Information Technology Act, 2000 (IT Act, 2000) and its rules (IT Rules, 2011 and 2021);
- Consumer Protection (E-Commerce) Rules, 2020;

This policy details how we collect, use, share and protect your personal data in accordance with Indian law.

## **1. Personal data we collect**

We may collect your personal data through our website, applications, customer service communications and transactions.

### **1.1 Identification data**

- First and last name;
- Telephone number;
- Email address;
- Residential and/or shipping address;
- Identity document, passport, personal documents such as residence permits, other personal documents necessary for the tourist stay.

### **1.2 Financial and payment details**

- Credit/debit card number;
- Bank information for payments;
- Transaction history and invoicing.

### **1.3 Browsing and technological data**

- IP address;
- Device type and operating system;
- Cookies and tracking technologies;
- Browsing history on our website.

### **1.4 Sensitive data (only with explicit consent)**

According to the DPDP Act, 2023, certain data is considered sensitive and requires your explicit consent before collection and processing. These include:

- Biometric data (fingerprints, facial recognition);
- Detailed financial information;
- Health or medical data;
- Data relating to religion, political opinions or personal orientations;
- Profiling and purchasing behaviour.

## **2. Purpose of data processing**

We collect and use your personal data exclusively for the following purposes:

- Provision of products and services : order management, deliveries, invoicing and customer care;
- Improvement of user experience : personalisation of offers and suggestions;
- Payment processing and fraud prevention : transaction verification and financial security;
- Communications and marketing: sending promotional offers, company updates and notifications;
- Legal obligations and compliance: compliance with tax, customs and information security regulations in India.

If we intend to use your information for purposes other than those stated above, we will require your prior consent.

## **3. Legal basis for data processing**

According to the DPDP Act, 2023, the processing of personal data must take place on the basis of one of the following conditions:

- Explicit consent of the user (mandatory for sensitive data and for direct marketing purposes);
- Performance of a contract (when the data is necessary to provide a service);
- Legal obligation (where the law requires the collection or retention of certain data);
- Legitimate interest (for security, fraud prevention, data analysis).

## **4. Storage and protection of personal data**

We only retain your personal data for as long as necessary to fulfil the stated purposes or for as long as required by law. We take strict security measures to protect your data from:

- Unauthorised access;
- Misuse or disclosure;
- Accidental modification or loss;

Security measures implemented include encryption, firewalls, multi-factor authentication and continuous monitoring.

## **5. Sharing and transfer of personal data**

We may share your data with:

- Service providers (e.g. payment processors, logistics and customer service companies);
- Indian government authorities, if required for legal or national security reasons;
- Advertising partners, but only with your explicit consent.

### **5.1 International data transfer**

- You have provided your explicit consent ;
- The recipient country has adequate protection measures ;
- Standard data protection clauses are in place.

Data collected outside the territory of India for which we have received your explicit consent for collection and storage do not fall under the obligations of section 5.1.

## 6. Your rights to personal data

To exercise these rights, you may contact us at [info@guelka360.com](mailto:info@guelka360.com) or +110010240108. If you feel that the processing

## 7. Use of cookies and tracking technologies

According to Indian regulations, we cannot use cookies for advertising purposes without your explicit consent.

We reserve the right to update this policy from time to time to reflect new legislation or changes in our services. We will inform you in advance via our website or other official channels.

If you have any questions or requests regarding the protection of your personal data, you can contact us:

Telephone : +410919240108.

If you are not satisfied with our response, you may contact the Data Protection Board of India (DPBI) to lodge a complaint. This policy complies with the Digital Personal Data Protection Act, 2023 and other Indian data protection regulations.

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권리	설명
개인정보 열람 요청 권리	귀하는 본인의 개인정보 사본을 요청할 수 있습니다.
개인정보 정정 요청 권리	귀하는 본인의 개인정보 오류를 수정할 수 있습니다.
개인정보 삭제 요청 권리	법적 의무가 없는 경우, 귀하는 본인의 개인정보 삭제를 요청할 수 있습니다.
동의 철회 권리	언제든지 개인정보 처리에 대한 동의를 철회할 수 있습니다.
개인정보 이동 권리	귀하는 본인의 개인정보를 다른 서비스로 이전하도록 요청할 수 있습니다.

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\*\* \*\*: info@quokka360.com.

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