

# PRIVACY POLICY

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This website, [www.blueskyluxurystlucia.com](http://www.blueskyluxurystlucia.com) (the "Site") as well as all other official Blue Sky Luxury digital products (together "Digital Products") are operated by Blue Sky Luxury. Blue Sky Luxury is registered in St. Lucia with company number 1 758 450 8240 with its registered office being P.O Box BW419, Rodney Bay, Gros Islet, St. Lucia LC01 601, West Indies ("we", "us" and/or "our").

This privacy policy (the "Privacy Policy") outlines the basis on which any personal data we collect, or that you provide to us, will be processed by us. We are not responsible for the privacy policies of other websites or applications, and encourage you read all applicable terms, conditions and privacy policies when using other websites and applications.

For the purpose of data protection law, we are the data controller. Questions, comments and requests regarding this Privacy Policy and how we use your personal data are welcomed and should be addressed to [frontdesk@tropicalvillas.net](mailto:frontdesk@tropicalvillas.net)

## AGREEING TO OUR PRIVACY POLICY

By using our Digital Products, you agree to us using your data in accordance with this Privacy Policy. There are certain services that we may not be able to provide if you do not choose to provide relevant information.

By using our Digital Products, you agree to us collecting and using personal information about you in accordance with this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use our Digital Products.

You have choices about the data we collect. When asked to provide certain personal information you may decline, but where such is necessary to provide a service or feature, your use of that service or feature may be restricted as a result.

We will hold your personal information for as long as reasonably necessary for the relevant purpose.

## WHAT INFORMATION DO WE COLLECT?

We collect data to operate effectively and provide you the best experiences with our products. You provide some of this data directly, such as when you create an account or contact us for support. We get some of it by recording how you interact with our products by, for example, using technologies like cookies – this may collect data about your use of our Digital Products, your device(s) and your location.

We will collect and process the following data about you (the "Information"):

- Information you give us. You may give us information about you by filling in forms or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you enquire, subscribe to any service, enter a competition, promotion or survey and when you report a problem. The information you give us may include your name, address, e-mail address, date of birth, nationality and phone number, and preferences.
- Information we collect about you. We may automatically collect the following information:
- Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, screen resolution details, browser type and version, time zone setting, mobile and network information, browser plug-in types and versions, operating system, platform and information about your geographic location; and
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Digital Products (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

## Google Analytics

Like most websites around the world we use Google Analytics (GA) to process information about the number of visitors on our site and their behaviour.

We use this information to record the number of people using [www.blueskyluxurystlucia.com](http://www.blueskyluxurystlucia.com) and to better understand where you discover our site (from social media, Google or another site), how you use it and how you move throughout the site.

Google Analytics records your approximate location down to town level, the type device you are using (example: mobile) type of device (example: iPhone), operating system (example: iOS) and browser (example: Chrome). None of this data can be used to identify you.

While Google does record your IP address, we don't have access to this information. Google modifies it so that you cannot be specifically identified; it only tells us the area you're in.

### **Google Analytics Demographics**

We are committed to ensuring that our website contains content that is valuable and useful to our users.

To help us with this, we have implemented the Google Analytics demographics and interest reporting features on our website.

These tools allow us to review anonymous data regarding the gender, age and interests of website visitors and adapt our website content to better reflect their needs.

Although this information is collected through your Google Ad settings, it is not provided to us in a personally identifiable format. This means we cannot identify what information is about you, and we will not try to figure it out.

To do this, Google Analytics uses a "cookie" on your machine.

### **Cookies**

Our Digital Products use cookies and similar technologies. Cookies track your use of our site to help us provide the best possible experience for you.

You can opt-out of Google Analytics for Display Advertising and customise Google Display Network ads using the [Google Ad settings](#) or through the [Google Analytics opt-out browser add-on](#).

### **Leaving a Comment on our Site**

We love hearing from you, and we do this by giving you the option of leaving a comment on some of our content.

We only use this information to identify you as the comment maker and do not pass this on to any third party.

Your email address will never be shown in the comment section of the site.

Your details will remain in the database unless we remove it, or the article is removed from the site.

You may request that we delete the comment and remove you details at any time. Please email us at [frontdesk@tropicalvillas.net](mailto:frontdesk@tropicalvillas.net) to make this request.

If you are under 16, you must obtain your parents' permission before leaving a comment.

**IMPORTANT: In your comment you should avoid leaving information of a personal nature. It is recommended that you do this on any website you choose to comment on.**

### **Subscriber Newsletter**

If you choose to join one of our newsletters, then your email address is required so that you can be sent the emails.

Your data is collected and then passed to our Email Service Provider, Ciirus.

You may unsubscribe at any time from our newsletters using the unsubscribe link at the bottom of the email, or you can email us and ask that you be removed. *Please make sure that you are using the same email address that you receive the emails on to do this.*

Within the Email Service Provider, we use tags to track the pages that you visit and actions that you take within the emails so that we can provide a more personalized email service to you.

We may send emails once or twice a week and with our tracking try and make these as relevant to you as possible. From time to time, we may include promotions for products and services.

Some of these advertisers may use technology such as cookies and web beacons when they advertise on our site, which will also send these advertisers (such as Google through the Google AdSense program) information including your IP address, your ISP, the browser you used to visit our site, and in some cases, whether you have Flash installed.

This is generally used for geotargeting purposes (showing New York real estate ads to someone in New York, for example) or showing certain ads based on specific sites visited (such as showing cooking ads to someone who frequents cooking sites).

### **Cookies**

Our Digital Products use cookies and similar technologies. Cookies track your use of our site to help us provide the best possible experience for you.

You can choose to disable or selectively turn off our cookies or third-party cookies in your browser settings, or by managing preferences in your browser.

However, this can affect how you are able to interact with our site as well as other websites.

### **HOW DO WE USE YOUR INFORMATION?**

We may use your information in a number of ways, including providing Services, personalizing and improving the services we offer, carrying out our obligations, communicating with you, analysing use of our Digital Products and in other ways that you agree to.

We may share your information with our group companies, law enforcement agencies, service providers, partners, people who operate or take over our Digital Products and third parties that you agree that we can share it with.

We may disclose your information in order to enforce the terms of use of any of our Services, to protect our rights, to comply with applicable laws and as is reasonably necessary to operate our systems and protect us and our users.

We may use your Information:

- To communicate with you (including by post, phone, email and/or mobile messaging), such as to let you know about new features, offerings (including goods and services) on our Services where you have consented for us to do so;
- To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- To create an individual profile for you so that we can understand and respect your preferences;
- For record keeping purposes;
- To administer and provide services you request;
- To carry out market research so that we can improve the products and service we offer;
- To improve the quality of our service and security of our Digital Products;
- To understand your preferences so that we can improve the products and services we offer;
- In connection with targeting/advertising activities;
- To track activity on the Site and our Services;
- In conjunction with personal data legally obtained from third party sources;
- In such way as you may otherwise expressly consent to;
- To comply with legal and regulatory requirements; and/or
- For any other purpose that we may notify to you from time to time.

You agree that we will share your Information with:

- Carefully selected third party organisations to carry out certain processing activities on our behalf where such parties have the necessary protections in place to comply with applicable data protection law;
- Any Blue Sky Luxury partner in a manner to which you have expressly consented to (this includes consent by way of opting-in to certain marketing and contact from any of them as part of the registration process) and you agree that such parties can contact you in accordance with such consent;
- Anyone who may take over the running of our Digital Products, or any subcontractors who operate a part of our Digital Products on our behalf. Any other organisations who access your information in the course of providing services on our behalf will be governed by strict contractual restrictions to make sure that they protect your Information and comply with applicable data protection and privacy laws. We may also independently audit these service providers to make sure that they meet our standards; and/or

- Any law enforcement agency requesting it once we are reasonably satisfied as to the circumstances surrounding the request.

We will disclose your Information to third parties:

- In order to enforce or apply the terms of use of the Site, our Digital Products or any services provided to you;
- To protect our rights, property, or safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction;
- To comply with applicable laws and lawful government requests; and/or
- To operate our systems properly or to protect our users and ourselves.
- Except as expressly stated in this Privacy Policy, we will not sell, share, trade or license your Information to others without your express consent.

### **Children (Under 16 Years of Age)**

If you are a child who is using our Digital Products or a parent of a child using our Digital Products, there are additional rules.

If you are under 16 years of age, please obtain your parents' permission before entering any personal information on our website. We are equally concerned with your privacy as much as an adult's.

We encourage parents and guardians to supervise their children's online activities by, for example, adopting parental control tools available from online services and software manufacturers that help provide a child-friendly online environment. These tools can also prevent children from disclosing online their name, address, and other personal information without parental permission.

Your child's privacy is important to us. We are committed to safeguarding children's personal information collected online, and to helping parents and guardians and their children learn how to exercise control over personal information while exploring the Internet. If you are a parent or guardian and would like to review any personal information that we have collected online from your child, have this information deleted, and/or request that there be no further collection or use of your child's personal information or if you have any questions about our Privacy Policy or practices, you may contact us at [experts@blueskyluxury.com](mailto:experts@blueskyluxury.com)

### **Security**

We have security protocols in place to protect your Information from unauthorised access, improper use or disclosure, unauthorised modification, and unlawful destruction or accidental loss. We only allow access to our databases when necessary, and then under strict guidelines as to what use may be made of such data.

### **Where we store your Information**

We may use service providers to help us run our Digital Products (or services available on our Digital Products).

### **Marketing and Unsubscribing**

If you wish to unsubscribe from the list, please click on the unsubscribe link in the relevant email or e-mail us at [frontdesk@tropicalvillas.net](mailto:frontdesk@tropicalvillas.net). Except as to the extent you consent to us doing so under this Privacy Policy, we will not share, license or sell these e-mail addresses without your express consent.

### **Your Rights in relation to your data**

You have rights to access, correct, delete your information or to object to or restrict our processing of it in certain situations. No fee is usually required to exercise these rights, but we may need certain information from you.

In certain circumstances, you have the right to:

- Request access to your personal information: this enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- Request correction of the personal information that we hold about you: this enables you to have any incomplete or inaccurate information we hold about you corrected
- Request erasure of your personal information: this enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)

- Object where we are processing your personal information for direct marketing purposes or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground. Generally, other than in relation to marketing, our processing of your personal data is in order to allow us to provide you a service, so we will be unable to provide the service to you without processing your personal data
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you require any further help from us in relation to the above rights, please email [frontdesk@tropicalvillas.net](mailto:frontdesk@tropicalvillas.net)

No fee is usually required - You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you - We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **CHANGES TO OUR PRIVACY POLICY**

Privacy laws and practice are constantly developing. Our policies and procedures are therefore under continual review. We may, from time to time, update our privacy policy. Any such changes will be posted on this page. Please check back frequently to see any updates or changes to the Privacy Policy.

#### **How to Complain**

We endeavour to meet the highest standards when collecting and using personal information, however if you wish to lodge a complaint as to how we collect and process your Information please contact [frontdesk@tropicalvillas.net](mailto:frontdesk@tropicalvillas.net).

Thank you for visiting our site.

For further information, please contact us.