

PALACE HOLDINGS LIMITED

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Group Discount Card Policy

Throughout this document the words “we”, “us” or “our” refers to Palace Holdings Limited and its subsidiary companies, and references to “Card” refer to the 10-year discount card issued under the terms contained in our Circular to Ordinary Shareholders dated 19 October 2021.

The Privacy Policy describes our approach to any Personal Data that we may collect from you in relation to the issue of the Card, and the purposes for which we may use it.

Basic use of Personal Data

By applying for the Card, you authorise us to use, store or otherwise process any Personal Data, including but not limited to, your name and address, that personally identifies you (‘Personal Data’) to enable us to print, dispatch and administer the Card and provide services and products related to ownership of the Card.

We may, where necessary, transfer or disclose Personal Data to our professional advisers, and to such other parties as is required by law or regulation. We may aggregate statistics from the use of Cards and disclose such aggregate data to third parties for marketing, advertising, or other promotional purposes but such aggregate data will not include any Personal Data.

We would ask that the Personal Data you provide is accurate and complete as we need this to issue and administer the Card and avoid correspondence being misdirected. We would also ask that you notify us of any changes to your details as soon as you are able so that we can maintain up to date records.

Enhanced use of Personal Data

If you provide your written permission at the time of issue of the Card (or subsequently) we will use the Personal Data to send you details of new products, promotions and services which we think may be of interest to you.

We will not provide Personal Data to any third parties for any reasons other than those outlined in “Basic use of Personal Data” above.

Your Rights

You have the following rights in relation to your Personal Data. Right of access - If you request access, we will confirm whether we are analysing your Personal Data. If we are, we will then provide you with a copy of that Personal Data.

Right of rectification - If the Personal Data that we hold about you is incomplete or inaccurate, you are within your rights to request that we update your Personal Data. If we have given any third parties access to your Personal Data, we will also update them on the changes. If you ask us, and we are legally able to do so, we will also let you know who we have shared your Personal Data with so that you can personally contact them.

Right of erasure - You may request that we erase or remove your Personal Data. For example, if the Personal Data we hold about you is no longer necessary, or you withdraw your consent

(where applicable), or the data was unlawfully processed. If you ask us, and we are legally able to do so, we will also let you know who we have shared your data with so that you can personally contact them.

Right to restrict processing - You may ask us to limit the processing of your Personal Data in certain circumstances. For example, if you believe your Personal Data is inaccurate, or you do not consent to us processing it.

Right to lodge a complaint with a supervisory authority - If you have a problem or concern about our Privacy Policy or how we have handled your Personal Data, you can lodge a complaint with the Isle of Man Information Commissioners Office (ICO). You can find details about how to do so at the ICO website - <https://www.inforights.im>

General

We will hold Personal Data in accordance with applicable laws and regulations. Our Privacy Policy may change from time to time to reflect updates in law and regulation, and if this involves significant change, we will notify you directly. However, we suggest that you review our Privacy Policy on occasion to stay up to date with how we are using your Personal Data.

If you would like to update your Personal Data or modify your communication preferences, please contact us by e-mail at cards@palace.co.im or write to us at the following address: Sefton Group plc, Sefton Hotel, Harris Promenade, Douglas, Isle of Man, IM1 2RW

How to Apply

Only applicable when new scheme is introduced